



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

**Assessment of England Coast Path proposals between
Penzance and St Mawes**

On The Lizard Special Area of Conservation (SAC)

18 September 2019



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regulation 63 of the
Habitats Regulations 2017 (as amended)
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Summary

I) Introduction

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

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

- The Lizard SAC

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

www.gov.uk/government/publications/coastal-access-in-cornwall-from-penzance-to-st-mawes-comment-on-proposals

II) Background

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

Table 1 Main Wildlife Interest

Interest	Description
Open Coastal Habitats	The site as a whole grades from cliff land vegetation containing rare plants through to heathland, normally dominated by heather <i>Calluna vulgaris</i> and bell heather <i>Erica cinerea</i> . In addition, the Lizard has extensive heath rich in the rare Cornish heath <i>Erica vagans</i> , as well as wet heath communities. The combination of the complex geology and southern location has resulted in the diverse nature of the plants and plant communities found on the site, many of which are particularly species-rich.

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



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Terrestrial wetland habitats	Features of the site include calcium-rich nutrient-poor pools, which occur on the Lizard peninsula due to the unusual and varied geology. Mediterranean temporary ponds also occur inland from the coastal margin on tracks that contain ruts from machinery, allowing these temporary ponds to form.
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III) Our approach

Natural England's approach to ensuring the protection of sensitive nature conservation features under the Coastal Access Programme is set out in section 4.9 Coastal Access: Natural England's Approved Scheme 2013 <http://publications.naturalengland.org.uk/publication/5327964912746496>

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

Evidence is also gathered as appropriate from a range of other sources which can include information and data held locally by external partners or from the experience of local land owners, environmental consultants and occupiers. The approach includes looking at any current visitor management practices, either informal or formal. It also involves discussing our emerging conclusions as appropriate with key local interests such as land owners or occupiers, conservation organisations or the local access authority. In these ways, any nature conservation concerns are discussed early and constructive solutions identified as necessary.

The conclusions of 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.



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A key consideration in developing coastal access proposals for the Lizard SAC has been to manage the current visitor pressure on the designated open coastal habitats to ensure that habitats that have already been damaged are restored and that further damage does not occur due to our proposals.

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

- avoid exacerbating issues at sensitive locations by making use of the current established coastal path.
- clarify when, where and how people may access the foreshore and other parts of the coastal margin on foot for recreational purposes
- work with local partners to design detailed proposals that take account of and complement efforts to manage access in sensitive locations
- where practical, incorporate opportunities to raise awareness of the importance of this stretch of coast for wildlife and how people can help efforts to protect it.

V) Conclusion

We have considered whether our detailed proposals for coastal access between Penzance to St Mawes might have an impact on The Lizard SAC. In Part C of this assessment we identify some possible risks to the relevant qualifying features and conclude that proposals for coastal access, without incorporated mitigation, may have a significant effect on some of these sites. In Part D we consider these risks in more detail, taking account of avoidance and mitigation measures incorporated into our access proposal, and conclude that there will not be an adverse effect on the integrity any of these sites.

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

Risk to conservation objectives	Relevant design features of the access proposal
Loss or damage to SAC features as a result of path improvement works	The proposed works will make the existing path easier to use and follow and create a more sustainable surface that is easier to maintain. In turn, this will help to manage access and reduce damage to SAC features. In places where habitat restoration work is planned as part of the access proposals, improvements to the path will help protect new vegetation growth from trampling.
Realignment of the path might be detrimental to SAC features	Identification of a route on the ground that is easy to use and follow and can be sustainably maintained. Where new sections of trail are created, avoiding sensitive areas that might be damaged by trampling and clearing scrub where this will benefit SAC features.



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Temporary damage to SAC features whilst improvement works are carried out	When practicably possible, materials will be transported to site by hand. Existing tracks and / or adjoining agricultural land will be used to transport materials to the vicinity of the work site. When practicably possible, work on site to be carried out by hand. If machinery is required, then the minimum size of machinery that is adequate for the task will be used, with machinery confined to the line of the path. Any damage to the path surface will be made good at the end of the works. Works to be carried out when conditions are dry to avoid poaching of the ground.
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VI) Implementation

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

VII) Thanks

The development of our proposals has been informed by input from people with relevant expertise within Natural England and other key organisations. The proposals have been thoroughly considered before being finalised and our initial ideas were modified during an iterative design process. We are particularly grateful to Cormac, the National Trust, the RSPB, the South West Peregrine Group and the Cornwall Seal Group and Research Trust and to other organisations and local experts whose contributions and advice have helped to inform development of our proposals.



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PART A: Introduction and information about the England Coast Path

A1. Introduction

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

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

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

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

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

Natural England's approach to ensuring the protection of sensitive nature conservation features under the Coastal Access Programme is set out in section 4.9 of the Coastal Access Scheme <http://publications.naturalengland.org.uk/publication/5327964912746496>



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A2. Details of the plan or project

Our proposals for coastal access have two main components:

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

This assessment considers Natural England's proposals for coastal access along the stretch of coast between Penzance and St Mawes on the Lizard SAC². 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 lengths in question. These include: Loe Bar to Mullion Cove report (PSM 4), Mullion Cove to Devil's Frying Pan report (PSM 5), Devil's Frying Pan to Dolor Point report (PSM 6) and Dolor Point to Porthoustock report (PSM 7).

England Coast Path

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

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

Coastal Margin

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

Coastal margin is typically subject to new coastal access rights, though there are some obvious exceptions to this. The nature and limitations of the new rights, and the key types of land excepted from them, are explained in more detail in Chapter 2 of our Coastal Access Scheme <http://publications.naturalengland.org.uk/publication/5327964912746496>

² Linked assessments have been prepared for other European sites potentially affected by the access proposals for this stretch. These assessments are published as separate documents.



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Where there are already public or local rights to do other things, these are normally unaffected and will continue to exist in parallel to the new coastal access rights. The exception to this principle is any pre-existing open access rights under Part 1 of the Countryside and Rights of Way Act 2000 (CROW) over land falling within the coastal margin: the new coastal access rights will apply in place of these.

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

Promotion of the England Coast Path

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

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

Maintenance of the England Coast Path

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

Responding to future change

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



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Establishment of the trail

Establishment works to make the trail fit for use and prepare for opening will be carried out before the new public rights come into force on this stretch. Details of the works to be carried out and the estimated cost are provided in the access proposals. The cost of establishment works will be met by Natural England. Works on the ground to implement the proposals will be carried out by Cornwall Council subject to any further necessary consents being obtained, including to undertake operations on a SSSI. Natural England will provide further advice to the local authority carrying out the work as necessary.

Local context

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

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

B1. Brief description of the European Site and its Qualifying Features

The Lizard SAC was designated on 1st April 2005. The site includes a typical sequence of cliff vegetation, with a variety of truly maritime plants, which grades into grazed and ungrazed communities on exposed cliffs. There are extensive areas of heathland rich in the rare Cornish heath *Erica vagans*. This habitat occurs on poorly-drained soils derived from ultra-basic serpentine and gabbro. It contains unusual mixtures of species characteristic of acid soils growing with species typical of base-rich soils, ranging from cliff-top heaths rich in maritime species, such as spring squill *Scilla verna*, to more inland heaths containing abundant bristle bent *Agrostis curtisii*. More typical stands of heath, sometimes called ‘short heath’ also occur. These are dominated by heather and bell heather.

The site also supports a unique series of oligo-mesotrophic (nutrient-poor to moderate nutrient status) waterbodies which have a high base status. Unusually their high base-status is due to igneous geology rather than limestone or shell-sand. Serpentine rock gives rise to calcium-deficient ground waters that are rich in magnesium. The waterbodies support a rare combination of plants with stoneworts Chara species, typical of calcareous lakes, growing together with species normally associated with acid conditions, such as bog pondweed *Potamogeton polygonifolius*.

There are also widespread examples of the serpentine variant of Mediterranean temporary ponds on the Lizard heaths. A number of rare species, including chives *Allium schoenoprasum*, dwarf rush *Juncus capitatus* and land quillwort *Isoetes histrix*, occur in this habitat type. The acid pool type is the main locality on the Lizard for an important assemblage of rare species, including pigmy rush *Juncus pygmaeus*, three-lobed crowfoot *Ranunculus tripartitus* and yellow centaury *Cicendia filiformis*, (*European Site Conservation Objectives Supplementary Advice on conserving and restoring features Feb 2019*).

Table 2. Qualifying features

Qualifying feature	The Lizard SAC
H1230 Vegetated sea cliffs of the Atlantic and Baltic Coasts	✓
H3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp.	✓
H3170 Mediterranean temporary ponds	✓
H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i>	✓
H4030 European dry heaths	✓
H4040 Dry Atlantic coastal heaths with <i>Erica vagans</i>	✓



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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;

<http://publications.naturalengland.org.uk/publication/5468171490295808>



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

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

Additional measures have been included in the access proposals specifically to speed up restoration of damaged areas of SAC habitat. These are proposed to be carried out in association with repairs and improvements to the surface and drainage of the South West Coast Path. The measures included scarifying or re-turfing damaged areas to accelerate regeneration and installing temporary post and wire guide fencing and explanatory notices to stop people walking on these areas whilst the vegetation is recovering. A further small area of H3170 Mediterranean temporary pond habitat is also proposed to be created as part of the works. Habitat restoration and creation measures are directly beneficial to the conservation of qualifying features of the Lizard SAC. Details of the areas where these operations will be carried out are described in Part D of this assessment, alongside assessment of the proposed path improvements.

Conclusion:

As the plan or project includes some 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 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).



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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 3 Feature sensitivity

Feature	Relevant pressure	Sensitivity to coastal access proposals	Assessment of risk to site conservation objectives	LSE alone?
H4040 Dry Atlantic coastal heaths with <i>Erica vagans</i>	Physical damage to habitat	Habitat might be damaged or lost as a result of carrying out path improvement works. Realignment of the South West Coast Path might lead to trampling of vegetation on the line of the new route, potentially leading to a loss of vegetation cover and erosion of the underlying substrate.	The South West Coast Path around the Lizard is a popular walking route. The access proposals provide for some changes to alignment and repairs to the path in places where the underlying substrate is eroding and/or surrounding vegetation is being damaged. Proposed works include surface improvements, installation of steps & stepping stones, water management measures, additional waymarking and route realignment. Significant effects cannot therefore be ruled out at this stage of the assessment.	Yes
H4030 European Dry Heaths	Physical damage to habitat	Habitat might be damaged or lost as a result of carrying out path improvement works. Realignment of the South West Coast Path might lead to trampling of vegetation on the line of the new route,	The South West Coast Path around the Lizard is a popular walking route. The access proposals provide for some changes to alignment and repairs to the path in places where the underlying substrate is eroding and/or surrounding vegetation is being damaged. Proposed works include surface improvements, installation of steps &	Yes

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		potentially leading to a loss of vegetation cover and erosion of the underlying substrate.	stepping stones, water management measures, additional waymarking and route realignment. Significant effects cannot therefore be ruled out at this stage of the assessment.	
H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i>	Physical damage to habitat	Habitat might be damaged or lost as a result of carrying out path improvement works. Realignment of the South West Coast Path might lead to trampling of vegetation on the line of the new route, potentially leading to a loss of vegetation cover and erosion of the underlying substrate.	The South West Coast Path around the Lizard is a popular walking route. The access proposals provide for some changes to alignment and repairs to the path in places where the underlying substrate is eroding and/or surrounding vegetation is being damaged. Proposed works include surface improvements, installation of steps & stepping stones, water management measures, additional waymarking and route realignment. Significant effects cannot therefore be ruled out at this stage of the assessment.	Yes
H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts	Trampling of vegetation, Loss of extent and Temporary damage to habitat	Habitat might be damaged or lost as a result of carrying out path improvement works. Realignment of the South West Coast Path might lead to trampling of vegetation on the line of the new route, potentially leading to a loss of vegetation cover and erosion of the underlying substrate.	The South West Coast Path around the Lizard is a popular walking route. The access proposals provide for some changes to alignment and repairs to the path in places where the underlying substrate is eroding and/or surrounding vegetation is being damaged. Proposed works include surface improvements, installation of steps & stepping stones, water management measures, additional waymarking and route realignment. Significant effects cannot therefore be ruled out at this stage of the assessment.	Yes
H3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara spp.</i>	None identified	The access proposals will not affect parts of the site where this feature occurs.	The location of the proposed trail and margin are seaward of the feature on this site and so there is no risk to the Conservation Objectives of the site.	No
H3170 Mediterranean temporary ponds	None identified	The access proposals will not affect parts of the site where this feature occurs.	The location of the proposed trail and margin are seaward of the feature on this site and so there is no risk to the Conservation Objectives of the site.	No



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Conclusion:

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

- H4040 Dry Atlantic coastal heaths with *Erica vagans*; Dry coastal heaths with Cornish heath
- H4030 European Dry Heaths
- H4010 Northern Atlantic wet heaths with *Erica tetralix*
- H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts

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

- H3140 Hard oligo-mesotrophic waters with benthic vegetation of *Chara spp.*
- H3170 Mediterranean temporary ponds

(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.



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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 'alone', further appropriate assessment of the project 'alone' is required.



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PART D: Appropriate Assessment and Conclusions on Site Integrity

D1. Scope of Appropriate Assessment

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

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

Table 4. Scope of Appropriate Assessment

Environmental pressure	Qualifying Feature(s) affected	Risk to Conservation Objectives
Loss or damage to habitat	<ul style="list-style-type: none"> • H4040 Dry Atlantic coastal heaths with <i>Erica vagans</i> • H4030 European Dry Heaths • H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> • H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts 	Loss or damage to habitat as a result of the proposed programme of path improvement works could impact on the extent and distribution of qualifying features.
Trampling of vegetation	<ul style="list-style-type: none"> • H4040 Dry Atlantic coastal heaths with <i>Erica vagans</i> • H4030 European Dry Heaths • H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> • H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts 	Realignments of the path might lead to increased trampling away from the established paths that impacts on the structure and function of qualifying features.



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

The total area covered by the SAC is 3087.58 ha. Detailed habitat mapping is available for some parts of the site but is not complete at this time. The habitats that might be impacted by the access proposals (Dry Atlantic coastal heaths with *Erica vagans*; European Dry Heaths; Northern Atlantic wet heaths with *Erica tetralix*; and Vegetated sea cliffs of the Atlantic and Baltic coasts), are all widespread within the site. All of the above features occur as complex mosaics of habitat over this site, making mapping of these habitats somewhat arbitrary.

The site falls under multiple land owners with the majority of the site designated as a National Nature Reserve. Active management is undertaken within sections of the site, with vegetation management including grazing and scrub control used to maintain and enhance the heathland and grassland habitats.

The condition of the SAC habitats are assessed as part of the condition assessment of the underlying SSSI sites. The majority of the SSSI units that form the SAC are considered to be in favourable condition. However, the Lizard SAC Site Improvement Plan details four main threats to condition remedies:

1. Invasive species – the encroachment of invasive species within the designated habitats
2. Change in land management – active management of under managed habitats, including the introduction of appropriate grazing.
3. Inappropriate coastal management – the need to restore and create cliff top habitat in advance of cliff recession.
4. Habitat fragmentation – the need to create the right conditions in adjoining farmland for SAC habitats to expand.

As part of the work of the Coastal Access programme within the Penzance to St Mawes stretch, we have identified sections of the SWCP where targeted improvement works could be carried out that would make the path easier for people to use and follow, and create a more sustainable path surface that is easier to maintain. Many of these section of route are on the Lizard peninsula where the SWCP is already subject to significant and sustained use by the public year round. The Lizard is a popular holiday destination. In recent years, not only have numbers of visitors increased within the school holidays, but throughout the year. A benefit of the improvement works proposed is that they will help to restore and protect heathland and maritime grassland habitat that has been damaged, with particularly well used sections seeing a widening of the path corridor and adjacent SAC habitat suffering as a result of the level and frequency of use. Poor drainage and shallow soils have also contributed towards erosion of the habitat and substrate. The photographs below demonstrate the issue on a particularly heavily used section of the SWCP between Kynance Cove and Lizard Point.





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

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

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

D3.1 Proposed path improvement works through the Lizard SAC

As part of implementing coastal access around the Lizard, targeted improvement works are planned to the SWCP that will make the path easier for people to use and follow, and create a more sustainable path surface that is easier to maintain. A benefit of the planned path improvements is that they will help to address current impacts on SAC habitat caused by a number of factors including:

- The current heavy use of the SWCP
- Shallow soils
- Steep gradients
- Poor drainage

Our proposals for the England Coast Path around the Lizard will improve the experience for people using the SWCP and help to manage walkers by creating a path surface that is easy to use and follow at all times of year. In conjunction with the path improvements we propose to restore some areas of damaged habitat and raising awareness of the importance of the site through signage and interpretation. A benefit of this multi-faceted approach is designed to help manage the high level of users that use this stretch of coast and reduce current impacts on the wider SAC habitats.

We are using remedies that have been tried and tested by both the Access Authority and other site managers over several years. Building on this experience, Natural England has worked closely with the National Trust and the Access Authority to identify sections of the existing SWCP where these techniques could be used to improve the experience of people using the path and help reduce current impact of recreational activities affecting the site.

An example of the current issues that we are proposing to remedy can be found between Kynance Cove and Lizard Point. This stretch of coastline has the most frequent and heavy use of the whole Lizard peninsula. This frequent use, combined with shallow soils and poor drainage, has resulted in the path surface becoming worn away and muddy in places. As a result braided paths have formed as walkers avoid the eroded line of the path. Where the path surface has become damaged and difficult to walk over, the impacts of trampling have spread and in places a 5m wide strip of eroded

habitat has developed, (see example photos in section D2). It should be noted that the section of path immediately south of Kynance Cove is in good condition, due to the line of the coast path having been surfaced already resulting in walkers remaining on the defined route avoiding damaging the surrounding habitat, (see photo below).



Such surfacing and visitor management techniques have been trialled by the National Trust, including low rope or wire fencing to keep users on the line of the coast path and stop additional parallel paths being formed; water management measures to carry water off the path surface and scarifying or re-turfing damaged areas adjacent to the path to allow coastal habitats to recover.

Erosion of the path surface

Areas of erosion occur away from the Kynance Cove to Lizard Point section, usually where the path is located on a steep gradient combined with shallow soils. This makes the path difficult to use and a combination of measures are proposed such as steps and levelling of the path surface to ensure the path is more resilient to the level of access usage experienced.

Poaching of the path surface due to wet conditions

In certain areas the path surface is often wet due to rainfall, runoff, or the presence of springs or streams close to the path. This results in the ground becoming poached up, difficult to use and causing damage to the habitat, which often expands beyond the width of the path. Measures such as drainage channels, stepping stones and occasional surfacing are therefore proposed.

As part of the access proposals, it is planned to undertake works to remedy physical damage to the path and surrounding vegetation and establish a more sustainable route for the trail. Individual prescriptions have been worked out for each location where works will be undertaken. The types of works planned are summarised in Table 5.

Table 5. Summary of Proposed Works

Type of structure / works	Installation / work method	Typical dimensions	Surface area affected
New section of path	Cutting/mowing	The normal width of the path will be 1.5m	Length varies – see Table 6
Scrub clearance	Cutting of scrub species using brush cutters and chainsaws. Cut material to be pushed into adjacent scrub. All work carried out by hand.	Varies	Extent varies – see Table 6
Waymarker	Installed by hand	100mm x 100mm post per waymarker	0.01m ² per waymarker
Drainage grips / open stone lined drainage channel	Dug in by hand. Slate/stone lined open channel.	500mm x 2000mm per channel	1m ² per drainage channel
Stone or timber water deflectors	Dug in by hand	4m x 200mm per deflector	0.8m ² per deflector
Low wire fencing to guide walkers	1 post every 2 metres. Installation by hand	100m x 100mm per post	0.01m ² per post
Stone or timber steps	By hand or with 3t excavator depending on materials used.	1m x 400mm per step	0.4m ² per step
Stepping stones	Use 5t dumper and 5t excavator	600mm x 600mm	0.36m ²
Hard Surfacing	Use of 5t dumper, power barrow and 3t excavator	Dependant on location but between 1- 1.5m wide	See Table 6 below
Kissing gate	Posts dug in by hand	Hanging post – 150mm x 150mm. 4 other posts – 150mm x 75mm	0.06m ² per complete gate
Information panels	Posts dug in by hand	2 x 100mm x 100mm posts	0.02m ² per board.
Temporary signage	Posts dug in by hand	100mm x 100mm post	0.01m ² per sign
Habitat restoration	Scarify or re-turfing operations	Varies	Area affected varies – see Table 6



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Temporary access routes

Particular care has been taken when considering how to both transport materials to each site and how to carry out the works. Often the location is remote with no vehicular access resulting in materials having to be brought in by hand. When considering the method of undertaking the works the following points have been included to ensure minimal temporary impact on the site:

- When practicably possible, materials will be transported to site by hand.
- Existing tracks and / or adjoining agricultural land will be used to transport materials to the vicinity of the work site.
- When practicably possible, work on site is to be carried out by hand.
- If machinery is required, then the minimum size of machinery that is adequate for the task will be used, with machinery confined to the line of the path. Any damage to the path surface will be made good at the end of the works.
- Works will be carried out when conditions are dry to avoid poaching of the ground.

D3.2 Detailed assessment of planned works

In this section we have made a location by location assessment of the works planned. Following site surveys and detailed discussions with the access authority and the various site managers, the locations detailed below have been selected due to current damage to the line of the path being identified or the risk of damage to the path occurring in the future.

Details of the works to be carried out on site will be checked at establishment stage and further assessment under the Habitats Regulations made, as necessary, prior to works being carried out. This will be done by Cornwall Council as part of the SSSI assenting process.

Proposed improvements to the SWCP within the Lizard SAC

Details of the proposed works are given in Table 6. An estimate of the area of each item is included in the table based on standard measurements agreed with the site manager and access authority and listed in Table 5. For those works that are not based on standard measurements the area has been estimated on site. All of the access management infrastructure listed in Table 6 will be installed within the existing path corridor. Commentary on how possible impacts of transporting materials to remote locations will be minimised is included in the table.

In addition to the path improvements, at some locations it is proposed to restore areas of damaged habitat adjacent to the path (shown by italic text within the table). A total estimated area of 1,375m² of damaged habitat will be restored as shown in the table below.

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Table 6. Details of proposed works within the existing SWCP path corridor

Location	Coast path section number	Habitat	Issue	Proposed remedial actions
Mullion Cove	PSM-5-S002 to PSM-5-S007	Maritime Grassland	Steep coastal slope above Mullion that becomes poached during the winter months due to surface water and gradient.	Install: <ul style="list-style-type: none"> 9 drainage grips – 9m² 13 stone steps – 5.2m² Scrub encroaching on the existing path will also be cut back (approximately – 100m ²) Work carried out by hand. Use of machinery to carry materials to site.
Predannack Morva	PSM-5-S012 to PSM-5-S014	Maritime Grassland	Shallow soils and regular public access have eroded the habitat and substrate of the path in this location.	Install: <ul style="list-style-type: none"> 4 Stone water deflectors – 3.2m² Re-profiling eroded corner section of path – 15m² 6 timber steps – 2.4m² 6 steps cut into bedrock – 2.4m² Open stone lined drainage channel, (2m length) – 3m² Materials to be carried into site on foot.
Soap Rock	PSM-5-S042 to PSM-5-S047	Maritime Grassland	Steep valley with shallow soils and regular public access causing erosion of the path.	Install: <ul style="list-style-type: none"> Waymarker post – 0.01m² Sign for sensitive wildlife – 0.01m² 1 stone water deflector, (2m in length) – 1m² 1 stone water deflector, (7 m in length) - 3.5m² All work carried out by hand
Kynance Cove	PSM-5-OA002	H4030 European Dry Heaths	The alternative route is used at high tide, when the main trail is not available.	Install 12 steps carved into the rock on the route of the alternative high tide route.
Holestrow	PSM-5-S067 to PSM-5-S077	Maritime Grassland / Dry Heathland	Poor drainage, shallow soils and sustained public access have created a	Install: <ul style="list-style-type: none"> Drainage channels, (within surfaced path so included in figure below)

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			wide margin of damaged habitat and eroded substrate.	<ul style="list-style-type: none"> • Surfacing – 150m² • 6 temporary signage posts, (in place for two years) – 0.06m² • Temporary post and wire low fence, (120 posts) – 1.2m² • 10 Stepping stones – 3.6m² <p><i>In addition, damaged habitat adjacent to the path will be scarified or re-turfed – 500m²</i></p> <p>A mini dumper, mini excavator and power barrow will be used to reduce damage to habitat during construction.</p>
Pentreath Cove	PSM-5-S078	Maritime Grassland / Dry Heathland	Poor drainage, shallow soils and sustained public access have created a wide margin of damaged habitat and eroded substrate.	<p>Install:</p> <ul style="list-style-type: none"> • Drainage channels, (within surfaced path so included in figure below) • Surfacing – 360m² • 1 temporary signage post, (in place for two years) – 0.01m² • Temporary post and wire low fence, (90 posts) – 0.9m² <p><i>In addition, damaged habitat adjacent to the path will be scarified or re-turfed – 540m²</i></p> <p>A mini dumper, mini excavator and power barrow will be used to reduce damage to habitat during construction.</p>
Caerthillian Cove	PSM-5-S079 to PSM-5-S081	Maritime Grassland / Dry Heathland	Heavy public use of the existing coast path is causing erosion of the substrate and gullyng in places next to path.	<p>Install:</p> <ul style="list-style-type: none"> • Remove 13 existing steps – 5.2m² • Install 14 granite steps – 5.6m² • Re-grading and side shoring next to new granite steps – 30m² • 2 temporary signage posts, (in place for two years) – 0.02m² • Temporary post and wire low fence, (both sides of path, 100 posts) – 1m² • Surfacing – 200m² <p>Dumper used to bring materials in to site using existing tracks.</p>

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Holseer Cove	PSM-5-S091 to PSM-5-S093	Maritime Grassland / Dry Heathland	Poor drainage, shallow soils and sustained public access has created a margin of damaged habitat and eroded substrate.	<p>Install:</p> <ul style="list-style-type: none"> • Surfacing – 200m² • Temporary post and wire low fence, (200m, 100 posts) – 1m² • 2 temporary signage posts, (in place for two years) – 0.02m² <p><i>In addition, damaged habitat adjacent to the path will be scarified or re-turfed – 300m²</i></p> <p>A mini dumper, mini excavator and power barrow will be used to reduce damage to habitat during construction.</p>
Gwavas to Poltesco	PSM-5-S145 to PSM-5-S149, PSM-5-S152 and PSM-5-S153, PSM-5-S157, PSM-6-S001, PSM-6-S021, PSM-6-S024 and PSM-6-S025	Maritime Grassland / Dry Heathland	Wet and boggy sections of existing coast path that are often difficult to walk through due to the wet and muddy nature of the path in 7 locations between Gwavas and Poltesco.	<p>Install:</p> <ul style="list-style-type: none"> • 6 stepping stones – 2.16m² • Surfaced sections with drainage measures incorporated at Kildown Cove and Gwavas - 10m² • Chestnut handrail – 6 posts – 0.06m² • Replacement steps and revetments – replace like for like so no additional footprint. • Replacement stone stile – replace like for like so no additional footprint. <p><i>In addition, an area of 25m² of H3170 Mediterranean temporary pond habitat will be created as part of proposed works.</i></p> <p>Materials will either be brought in by hand or access via adjoining agricultural land.</p>
Downas Cove	PSM-6-S074 and PSM-6-S075	Maritime grassland	Due to steep gradient and shallow soils there is erosion of the maritime grassland habitat along the line of the path.	<p>Install:</p> <ul style="list-style-type: none"> • 140 timber steps – 56m² • 10 water deflector boards, (2m in length) – 4m² <p>Materials manually carried to site via adjoining agricultural fields.</p>
Chynhalls Bridge	Between PSM-6-S097 and PSM-6-S099	Maritime Grassland /		Install an interpretation panel – 2 x posts – 0.02m ²

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		Dry Heathland		
Boscarnon Cliffs	PSM-7-S016, PSM-7-S017 and PSM-7-S021	Wet Heathland	Water running down slope to location of path creating very wet and muddy surface. Current heathland habitat is damaged due to amount of water and footfall on the site.	<p>Remove 15 existing wooden steps and install:</p> <ul style="list-style-type: none"> • 50m stone causeway by using 0.36m² stones – 30m² • 10 stone steps– 4m² • 6 deflector boards – 4.8m² • 5 x culverts, twin wall plastic pipe 100mm diameter, 2m length, (underground) • Stone drainage channel – 1m² <p>Use of dumper and 3t mini excavator. Machinery will be working on the line of the path which is already damaged habitat.</p>
Trebarveth	PSM-7-S022, PSM-7-S024 to PSM-7-S030, PSM-7-S034 and PSM-7-S035	Maritime Grassland	Water running down slope to location of path creating very wet and muddy surface. Current grassland habitat is damaged due to amount of water and footfall on the site.	<p>Install:</p> <ul style="list-style-type: none"> • 20 stone steps – 8m² • 65 stepping stones – 23.4m² • Waymarker – 0.01m² <p>Use of dumper and 3t mini excavator. Machinery will be working on the line of the path which is already damaged habitat. Access via adjoining agricultural fields.</p>

Proposed realignment of the SWCP within Lizard SAC

Changes to the alignment of the existing SWCP are proposed at several places within the Lizard SAC where the current route has, or will soon, become dangerous to use, or it is difficult to maintain a suitable surface for walking. Details of proposed realignments are provided in Table 7.

The total length of new route proposed is 279m, of which 35m follows existing routes and 244m would be created. Walkers will be directed along the new sections of route and as a result an estimated 366m² of SAC habitat will be subject to increased trampling (the path will be approximately 1.5m wide). At the same time, trampling pressure will be alleviated along the former route of the path. Overall, the length of the SWCP through the Lizard SAC would decrease by 87m as a result of the proposals, mainly because the proposed realignment at Halzephron takes the route outside of the SAC.

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Table 7. Details of proposed realignments of the SWCP

Location	Coast path section number	Habitat	Issue	Proposed remedial actions
Halzephron	PSM-4-SO34	H1230 Vegetated sea cliffs of the Atlantic and Baltic coast	Coastal erosion is threatening the current alignment of the SWCP along the cliff top.	<p>A new alignment of path is proposed, the majority of which takes the SWCP outside the SAC.</p> <p>A 15m section of this route passes over an area SAC habitat where it is proposed to re-join the existing SWCP. Approximately 22.5m² of SAC habitat would be subject to trampling as a result.</p> <p>Walkers will be directed along the new route instead, alleviating trampling pressure along the cliff top.</p>
Kennack Sands, (Thorny Cliff)	PSM-6-SO38 to PSM-6-SO39	H4030 European Dry Heaths	The current line of the SWCP runs through a periodically muddy section causing localised damage to the heathland habitat.	<p>Scrub will be cleared along the line of a suspected former track for a length of 130m and width of 1.5m. Approximately 195m² of SAC habitat would be regularly cut and subject to increased trampling.</p> <p>The current vegetation along the line of the new route is well established Blackthorn scrub. Therefore, clearance and use of this route will likely create greater diversity of the overall heathland structure in this location and potentially allow the heathland to expand into the cleared area.</p> <p>Walkers will be directed along the new alignment, alleviating trampling pressure further down the slope where damage is occurring in wet areas.</p>
Kennack Towans	PSM-6-SO48	H1230 Vegetated sea cliffs of the Atlantic and Baltic coast	The current line of the SWCP runs at the back of the dunes with limited sea views.	Improvements would be made to an existing walked route across the headland. 30 new timber steps (an area of approximately 12m ²) will be installed along a 15m section.

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North Corner	PSM-7-SO14	H4030 European Dry Heaths	The current surface of the SWCP is often wet and poached in this location leading to a widening of the path corridor and impacts on surrounding habitat.	<p>A new alignment for the path is proposed over ground with better drainage that is more resilient, for a length of 69m and width of 1.5m (an area of approximately 103.5m²).</p> <p>The proposed new route is through scrub and secondary woodland habitat. Clearance of the new route, may offer the opportunity for new SAC habitat to colonise the area concerned.</p> <p>Walkers will be directed along the new route, alleviating trampling pressure and damage to surrounding habitat caused by the current alignment of the SWCP.</p>
Trebarveth	PSM-7-S034	Maritime Grassland	Coastal erosion is threatening a section of the existing SWCP	<p>A proposed new alignment to avoid eroding section of cliff. The realignment runs through dense scrub before joining with an existing walked route for 20m. Scrub will be cleared to join the two for a length of 30m and width of 1.5m. Approximately 45m² of SAC habitat would be regularly cut and subject to increased trampling. Stepping stones will be installed along wet sections, (approximately 15 stones equating to an area of 5.4m²).</p> <p>The current vegetation along the line of the new route is well established scrub. Therefore, clearance and use of this route will likely create greater diversity of the overall heathland structure in this location and potentially allow the heathland to expand into the cleared area.</p> <p>Walkers will be directed along the new alignment, alleviating trampling pressure further down the slope where damage is occurring in wet areas.</p>

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

In this section of the assessment we consider the overall impact of the access proposals on the Lizard SAC.

The South West Coast Path National Trail passes through the Lizard SAC providing an estimated 30 km of managed path. The width of the path also varies but where the terrain allows is typically 1.5m, allowing two people to walk abreast or space for overtaking/passing. The surface of the path varies according to the underlying substrate; for the most part it is compacted earth created by regular passage of feet. In addition to the SWCP there are a number of other recreational routes within the site.

The Lizard peninsula is a popular destination for visitors, many of whom will walk sections of the coast path. In places SAC habitat adjacent to the established SWCP is being damaged, or is at risk of being damaged, by widening of the path corridor. Where sections of path have become eroded, there is a risk of further damage if repairs to the path surface are not made. Popular sections of path where the soil is shallow and drainage poor are particularly at risk.

A benefit of the package of path improvement works and habitat restoration proposed is that it will help to reduce the current impact of public access on the Lizard SAC habitats. When considering what works to propose, careful consideration has been given to identifying what has been successful previously on other areas within the site and, where possible, to apply a consistent approach across the site as a whole.

Table 9 Assessment of adverse effect on site integrity alone

Risk to conservation objectives	Relevant design features of the access proposal	Can ‘no adverse effect’ on site integrity be ascertained? (Yes/No) Give reasons.	Residual effects?
Loss or damage to habitat as a result of path surfacing or other works could impact on the extent and distribution of qualifying features.	Targeted improvement works to create a more sustainable path surface along heavily used sections of the South West Coast Path. Use of methods and techniques that minimise temporary impacts whilst works are carried out.	Yes New access management infrastructure will be installed within the existing SWCP corridor. Stone surfacing and other infrastructure (steps, drains, signposts) will be installed along heavily used sections of the South West Coast Path where the substrate is currently damaged or at risk of becoming damaged. Without intervention, where the substrate becomes damaged, the extent of erosion	No



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		<p>and damage to SAC habitat outside the path corridor is likely to increase over time.</p> <p>By improving the path surface, trampling pressure on adjacent SAC habitat will be reduced.</p> <p>In places where habitat restoration work is planned, improvements to the path will help protect new vegetation growth from trampling.</p>	
<p>Realignments of the path might lead to increased trampling away from the established paths that impacts on the structure and function of qualifying features.</p>	<p>Where possible we have used an existing walked line on the ground to realign the path.</p> <p>Identification of alignments where the underlying substrate is resilient to trampling and provides a more appropriate path surface for the coastal trail.</p>	<p>Yes</p> <p>There will be an increase in trampling along newly created sections, however; Realignment of the path is proposed in places where the current route is causing erosion and it is difficult to maintain a suitable surface for walking. The proposed realignments will help to manage access to the site and reduce the occurrence, or risk, of damage to SAC habitat.</p> <p>The area affected (418.5m²) is small in the overall context of the site.</p> <p>In places, scrub clearance to create a new path corridor will provide the opportunity for increased SAC habitat to colonise.</p> <p>Where walkers are directed along the new alignment, trampling pressure will reduce along the line of the former path, allowing some recolonization.</p>	No



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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:

- Loss or damage to habitat as a result of path surfacing or other works could impact on the extent and distribution of qualifying features.
- Realignment of the path might lead to increased trampling away from the established paths that impacts on the structure and function of qualifying features.

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.

Natural England considers that in this case the potential for adverse effects from the plan or project has been wholly avoided by the incorporated or additional mitigation measures outlined in section D3. It is therefore considered that there are no 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. It has therefore been excluded, on the basis of objective information, that the project can have an adverse effect on site integrity in-combination with other proposed plans or projects.



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D5. Conclusions on Site Integrity

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

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 The Lizard SAC either alone or in combination with other plans and projects.



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PART E: Permission decision with respect to European Sites

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

We, Natural England, are satisfied that our proposals to improve access to the English coast between Penzance to St Mawes are fully compatible with the conservation objectives for the Lizard SAC.

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

Certification

Assessment prepared by:	Hugh Tyler	Cornwall Team Adviser
Date:	4 th July 2019	
HRA approved by:	David Marshall	Senior officer with responsibility for protected sites
Date:	4 th July 2019	



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