

# Public Document Pack



SOUTH EAST DEVON  
HABITAT REGULATIONS  
PARTNERSHIP

East Devon District Council  
Blackdown House  
Border Road  
Heathpark Industrial Estate  
Honiton  
EX14 1EJ  
DX 48808 HONITON

Tel: 01404 515616

[www.eastdevon.gov.uk](http://www.eastdevon.gov.uk)

## Agenda for South and East Devon Habitat Regulations Executive Committee Tuesday, 14th July, 2020, 2.00 pm

### Members of South and East Devon Habitat Regulations Executive Committee

Councillors R Sutton, M Wrigley, and D Ledger

**Venue:** On line via the Zoom App. All Councillors and registered speakers will have been sent an appointment with the meeting link.

**Contact:** Chris Lane 01395 517544; email [cplane@eastdevon.gov.uk](mailto:cplane@eastdevon.gov.uk)

(or group number 01395 517546)

6 July 2020

1 Public speaking

Information on [public speaking](#) is available online.

2 Minutes of the previous meeting (Pages 3 - 6)

3 Apologies

4 Declarations of interest

Guidance is available online to Councillors and co-opted members on making [declarations of interest](#)

5 Matters of urgency

Information on [matters of urgency](#) is available online

6 Confidential/exempt items

To agree any items to be dealt with after the public (including the Press) have been excluded. There are no items which officers recommend should be dealt with in this way.

- 7 2019-20 Annual Business Plan (Pages 7 - 47)
- 8 Financial Report July 2020 (Pages 48 - 57)
- 9 Risk Register Report 2020 (Pages 58 - 71)
- 10 2020-21 Annual Business Plan (Pages 72 - 95)
- 11 Dawlish SANGS Refreshments (Pages 96 - 101)

Under the Openness of Local Government Bodies Regulations 2014, any members of the public are now allowed to take photographs, film and audio record the proceedings and report on all public meetings (including on social media). No prior notification is needed but it would be helpful if you could let the democratic services team know you plan to film or record so that any necessary arrangements can be made to provide reasonable facilities for you to report on meetings. This permission does not extend to private meetings or parts of meetings which are not open to the public. You should take all recording and photography equipment with you if a public meeting moves into a session which is not open to the public.

If you are recording the meeting, you are asked to act in a reasonable manner and not disrupt the conduct of meetings for example by using intrusive lighting, flash photography or asking people to repeat statements for the benefit of the recording. You may not make an oral commentary during the meeting. The Chairman has the power to control public recording and/or reporting so it does not disrupt the meeting.

Members of the public exercising their right to speak during Public Question Time will be recorded.

#### Decision making and equalities

**For a copy of this agenda in large print, please contact the Democratic Services Team on 01395 517546**

EAST DEVON DISTRICT COUNCIL

Minutes of the meeting of South and East Devon Habitat Regulations Executive Committee held at Council Chamber, blackdown House, Border Road, Honiton, EX14 1EJ on 28 January 2020

**Attendance list at end of document**

The meeting started at 2.00 pm and ended at 4.00 pm

29 Public speaking

There were no members of the public wishing to speak.

30 Minutes of the previous meeting

Minutes of the South East Devon Habitat Regulations Executive Committee meeting held on 30 October 2019 were agreed and signed as a true record.

31 Declarations of interest

Minute 28 Cllr Martin Wrigley – Personal interest. His house looked over the estuary. Was a member as Treasurer of Cockwood Boat club.

32 Matters of urgency

There were no matters which the officers recommended be dealt with as Matters of Urgency.

33 Confidential/exempt items

There were no matters which the officers recommended be dealt with in Part B.

34 East Devon Pebblebed Heaths visitor access consultation.

The Executive Committee considered the joint report of Naomi Harnett, Principal Projects Officer and Neil Harris, Habitat Regulations Delivery Manager. The report outlined specific mitigation measures for the East Devon Pebblebed Heaths as identified in the Visitor Management plan. Within the context of an increasing human population, it was critical that future visitor access to the heaths was planned and prepared in advance of impacts. Robust and effective mitigation enabled the partner authorities to be certain of no net impact to this highly protected site. This enabled the continued development as outlined in respective local plans and within 10km of the heaths without the risk of legal challenge. Kim Strawbridge, East Devon Pebblebed Heaths Conservation Trust (EDPHCT) Site Manager provided the Executive Committee with a presentation.

During discussions the following points were noted:

- J The EDPHCT team were responsible for disposing of any fly-tipping that occurred on the Heaths. Rubbish in bins was collected by the relevant Streetscene service.
- J Attempts were being made to reduce event parking at Woodbury Castle due to the small capacity of that site and issues with traffic queuing on the highway. EDPHCT staff monitored car parking hotspots.

- | Reductions in car parking spaces at Castle car park would not take place and appropriate parking spaces would be saved at Estuary View car park instead.
- | It was proposed to keep parking free of charge, improve car park surfaces and install way marked trails. There were no plans to expand the number of car parking spaces as this could increase visitor pressure on the heaths.
- | Are we encouraging cycling to the Heaths and was there bike locking available? This would be investigated and monitored as considered appropriate.
- | There were some concerns raised about height barriers, which had been have taken into account and it was recommended some height barriers were locked open. If problems arise, these barriers would be closed and any concerns about the unauthorised use of car park sites would be carefully monitored.

Kim Strawbridge, Site Manager, EDPHCT was thanked for her presentation.

**RESOLVED:**

1. that the proposals outlined in the Pebblebed Heaths Visitor Access Advisory Report be noted.
2. that the outcome of the East Devon Pebblebed Heaths visitor access consultation exercise on the proposed changes to visitor access of the heaths be noted.
3. that the Committee will receive costed recommendations as part of the 2020-21 annual business plan and 5-year delivery programme as the next meeting of the Executive in April 2020.

- 35 Presentation from Stephanie Harper-Chung, Exe Estuary Officer for the Exe Estuary Management Partnership - Verbal report

The Executive Committee received a presentation from Stephanie Harper-Chung, Exe Estuary Officer for the Exe Estuary Management Partnership on aspects of the Management Partnerships work. It was noted that the Exe Estuary was a site of global significance in terms of overwintering bird populations and habitat and had various designations, including: SPA, SSSI and Ramsar sites. It was an excellent place for a variety of recreational activities and important for local businesses, tourism health & wellbeing.

The Executive Committee noted that the Exe Estuary Management Partnership co-ordinated management of the estuary on behalf of local authorities, government agencies and conservation bodies. The Partnership sought to conserve and enhance the estuary's special nature and promote sustainable uses. It was reported that the Partnership had undertaken a number of consultations and initiatives on behalf of the Executive committee, which included the wildlife refuge consultation, codes of conduct and a review of signage around the Exe Estuary.

Stephanie Harper-Chung was thanked for her representation.

- 36 Effecting positive behavioural change

The Executive Committee received the report of the Principal Projects Manager, EDDC, and Habitat Regulations Delivery Manager concerning a review of current and potential public engagement and education. It was acknowledged that promoting awareness and understanding of key messages was an essential component of the mitigation approach.

Members noted that there was an emphasis and focus on how engagement could have a positive impact on visitor education. Education and engagement were an essential part of the projects work and engagement with schools and school children was an especially important part of this work.

During discussions the following points were noted:

- ✓ Is there registration required for commercial dog walkers who use estuary sites (as at the Pebblebed Heaths)? Dog walkers were expected to follow the codes provided and the maximum number of dogs allowed per walker was 6 dogs per person.
- ✓ Importance of providing a consistent message to all dog owners was emphasised.
- ✓ Emphasis on engagement with schools; there was a significant programme of events which involved school age children.
- ✓ There were two different types of approach used for signage on the estuary for interpretation about the area and its wildlife and information on how to share the space respectfully.
- ✓ Concern expressed regarding the comment in the report of the likelihood of decreased improvement in reduction of disturbance events in the second year of use of wildlife refuges and reports in 2019 of frequent reports of major disturbance. How were these issues going to overcome? There were a number of incursions into these refugees mostly from water users. There needed to be more imaginative ways to overcome these problems.
- ✓ The future engagement initiatives for Devon Loves Dogs showed little change from previous years, but this work was limited by the 0.5 FTE officer hours. It was noted that the programme of work could be reviewed in the future to try to improve reach.
- ✓ Effect of the introduction of the Greater Exeter Strategic Plan on the Exe Estuary.

**RESOLVED:** 1. that the review of the approach to public engagement, education and behavioural change that has been undertaken be noted.  
2. that the proposals for adapting this approach to achieve greater levels of understanding and awareness of key issues be noted.

- 37 Dates of future meetings - The next meeting will be held on Tuesday 21 April 2020 in the Yarty Room, Blackdown house, Border Road, Honiton. Future meetings will be: Tuesday 14 July 2020, Tuesday 3 November 2020, Tuesday 2 February 2021 and 27 April 2021. (all at 2.00pm at Exeter City council offices)

#### Attendance List

##### **Councillors present:**

S Bond (Chairman)  
Rachel Sutton, Exeter City Council  
Martin Wrigley, Teignbridge District Council

##### **Councillors also present (for some or all the meeting)**

G Jung, Environment Portfolio Holder  
G Taylor Teignbridge District Council

##### **Officers in attendance:**

Ed Freeman, Service Lead Strategic Planning and Development Management  
Naomi Harnett, Principal Projects Manager East Of Exeter  
Christopher Lane, Democratic Services Officer  
Fergus Pate  
Anita Williams, Principal Solicitor (and Deputy Monitoring Officer)  
Andrew Wood, Service Lead - Growth Development and Prosperity  
Neil Harris, Habitat Regulation Delivery Manager  
Anne Mountjoy, Growth Point Communication Officer  
Jay Boyle, EEMP/Devon County Council  
Ella Chambers,  
Hilary Winter,  
Chris Harradies, EDDC  
Stephanie Harper-Chung, Exe Estuary Management Partnership  
Kim Strawbridge, Pebblebed Heaths Conservation Manager

**Apologies:**

Alison Slade, Natural England  
Peter Hearn, Exeter City Council

Chairman ..... Date: .....



SOUTH EAST DEVON  
HABITAT REGULATIONS  
PARTNERSHIP

# South East Devon Habitat Regulations Executive Committee

*2019/20 Annual Business Plan – Annual Report*

Naomi Harnett,  
Principal Projects Manager,

Neil Harris,  
Habitat Regulations Delivery Manager

Growth, Development & Prosperity,  
East Devon District Council  
July 2020

**Legal comment/advice:**

There is no direct legal comment to be made at this time, each and any individual issue will need to be considered as it arises.

**Finance comment/advice:**

The financial implications are set out in the report.

<b>Public Document:</b>	Yes
<b>Exemption:</b>	None
<b>Review date for release</b>	None

## Recommendations

It is proposed that the Executive Committee:

1. Notes the progress made in delivering the 2019/20 annual business plan.
2. Notes the status of mitigation measures from each of the plans, as well as explanations given for measures subject to delay and revised completion dates.

Equalities impact: Low

Risk: Medium.

This report is an update on the progress made in delivery of ongoing mitigation measures set out in previous annual business plans and ongoing measures established in the Plan. It is important that progress continues to be made, or this would put the delivery of the partner Authorities' Local Plans at risk due to the continued legal duties under the Habitat Regulations.

### 1. Summary/Overview.

1.1 The 2019/20 annual business plan (ABP) was approved at the meeting of the Executive Committee in the King Charles Room at Teignbridge District Council, Old Forde House, Brunel Road, Newton Abbot on April 29<sup>th</sup> 2019. Additional recommendations relating to staff resources were approved at the July 16<sup>th</sup> meeting of the Executive.

1.2 The measures were debated and endorsed by the Officer Working Group. The plan outlined the delivery of ongoing measures established in previous ABPs as well as a range of additional measures. In total, the plan earmarked expenditure of an estimated £216,256.

1.3 Projects included the continued funding of keystone mitigation measures such as the Delivery Manager, Habitat Mitigation Officers and Project Officer (Devon Loves Dogs (DLD)). Other significant measures approved as part of the plan included a visitor impact survey at Dawlish Warren, an all-sites visitor questionnaire and development of educational resources for schools visiting the East Devon Pebblebed Heaths.

1.4 The sudden and unexpected impact of the Covid-19 pandemic has had a significant impact on the ability of mitigation staff to carry out normal operations. Due to the lockdown and social distancing guidelines announced in March 2020 it was no longer possible to conduct regular patrols onsite or engage in our usual public engagement activities. This is an issue shared by the other mitigation approaches across the UK.

1.5 Thanks to ongoing support from our Communications Officer, we have continued to distribute our key messages via social media channels. Work is in progress to determine if, how and when it may be possible to resume some site-based activities whilst adhering to social distancing guidelines. The safety of our staff is paramount and any return to site based duties will only be considered following stringent risk assessment with the Corporate Health and Safety Officer.

1.6 Tables 1 & 2 report the status of mitigation measures identified in the 2019/20 ABP.

**Table 1.** 2019/20 Annual Business Plan – ongoing mitigation measures.<sup>1</sup>

Site	Measure	Status
Cross Site	Delivery Manager	Completed (ongoing)
Cross Site	Two Habitat Mitigation Officers	Completed (ongoing)
Cross Site	Warden vehicle	Completed (ongoing)
Cross Site	Dog project	Completed (ongoing)
Exe Estuary	Wildlife refuge monitoring	Initiated (ongoing)
Exe Estuary	Patrol boat	Completed (ongoing)
Pebblebed Heaths	Dog bins	Completed (ongoing)
SANGS	Dawlish Countryside Park	Completed (ongoing)
SANGS	South West Exeter	Initiated (ongoing)

**Table 2.** 2019/20 Annual Business Plan - “new” mitigation measures.

Site	Measure	Status
All	Visitor counts & surveys	Initiated (on hold <sup>2</sup> )
Dawlish Warren	Vegetation monitoring	Completed (ongoing)
Dawlish Warren	Regular newsletter	Initiated (ongoing)
Dawlish Warren	Reed screening between Bight & Golf Course	On hold <sup>3</sup>
Exe Estuary	New interpretation boards	Delayed <sup>4</sup>
Pebblebed Heaths	Signage	Initiated (ongoing)
Pebblebed Heaths	Visitor access improvements consultation <sup>5</sup>	Completed

<sup>1</sup> Staffing and associated resources re-approved by HREC July 2019

<sup>2</sup> It is not currently possible to conduct effective questionnaire work due to social distancing guidelines and increased risk to both surveyor and public.

<sup>3</sup> Certain measures at Dawlish Warren are under review, see separate 2020-21 ABP report.

<sup>4</sup> EA Tidal defence scheme underway at the Imperial Recreation Ground until summer 2020.

<sup>5</sup> Although not specifically outlined in the 19-20 ABP, this work emerged as a result of the preliminary survey report and represents a significant outcome in terms of time and process.

1.7 Tables 3 & 4 reflect the status of mitigation measures from all previous annual business plans.

Table 3. Initiated/completed/in progress.

<b>Site</b>	<b>Measure</b>	<b>Status</b>
Exe Estuary	Codes of Conduct	Completed
Exe Estuary	Procurement, installation, maintenance of buoy markers.	Completed
Exe Estuary	Update signs at public slipways	Completed
Dawlish Warren	Visitor Management Plan	In progress
Dawlish Warren	Petalwort monitoring	Completed
Dawlish Warren	Changes to car parking management	Initiated (ongoing)
Dawlish Warren	Carry out audit of information boards	Completed
Dawlish Warren	BBQ info at local retailers	Completed
Dawlish Warren	Regular Warren Newsletter	Completed (ongoing)
Dawlish Warren	Monitoring of vegetation change	Completed <sup>6</sup>
Pebblebed Heaths	Maps highlighting sensitive areas	Completed <sup>7</sup>
Pebblebed Heaths	Codes of conduct	Completed
Pebblebed Heaths	Boardwalks/ Path surfacing	Initiated (ongoing) <sup>8</sup>
Pebblebed Heaths	Educational work with schools	Completed (ongoing)
Pebblebed Heaths	Interpretation Boards	In progress <sup>9</sup>
Pebblebed Heaths	Changes to car parks (preliminary survey)	Completed

<sup>6</sup> Initial survey work is complete and will be reported to the next meeting of the Committee.

<sup>7</sup> Measure dependent on other outcomes from car parking and promoted routes, in progress.

<sup>8</sup> Pebblebed Heaths Conservation Trust continue work with a contractor to complete schedule of priority works.

<sup>9</sup> Preliminary illustration work completed, final delivery dependent on other visitor access improvements.

**Table 4 – mitigation measures carried over from previous business plans**

<b>Site</b>	<b>Measure</b>	<b>Status</b>
Dawlish Warren	Removal of Dog Control Order	On hold <sup>10</sup>
Dawlish Warren	Changes to car parking management	On hold
Dawlish Warren	Byelaw preventing fires and barbeques in buffer zone	Under investigation <sup>11</sup>
Dawlish Warren	Monitoring of accretion and erosion	On hold <sup>12</sup>
Exe Estuary	Updates of the Exe Estuary leaflets	On hold <sup>13</sup>

## **2. Progress.**

### **2.1 Habitat Regulations Delivery Manager.**

2.1.1 The Delivery Manager continues in post, working to organise and implement the approved Annual Business Plans, report progress to the Executive Committee, co-ordinate delivery of the Strategy, liaise with the Officer Working Group and undertake ongoing review of the Strategy. Progress is marked by the recruitment and retention of key staff, work on the Exmouth tidal defence scheme (TDS), increased support to the Executive Committee, activities to induct the new representative from Natural England and the completion of the East Devon Pebblebed Heaths visitor access improvements consultation.

2.1.2 Staff were instrumental in achieving improvements to TDS activities. Although the TDS is not part of the mitigation Strategy, part of the scheme involved substantial construction works adjacent to the wildlife refuge at Exmouth. The Environment Agency (EA) started work on the TDS in July 2019 to improve flood defences in 3 main areas, including the Royal Avenue and Imperial Recreation Ground (see “Area A” in Figure 1, below).

---

<sup>10</sup> District-wide Public Spaces Protection Order (PSPO) regarding dogs enacted by TDC in April 2019. This measure postponed until the effect of the PSPO is known.

<sup>11</sup> Pursuing with TDC Legal department. Evidence gathering still underway, no recent incidents reported.

<sup>12</sup> This is undertaken by the Environment Agency as part of the Beach Management Scheme until at least 2021. Recommend reviewing this measure after that time.

<sup>13</sup> The Exe Estuary Officer was able to source alternative funding for the leaflet updates. This funding reserved for future reprints of leaflets and/or codes of conduct.

2.1.3 Unforeseen issues arose in delivery of the scheme which resulted in sea wall construction works in Area A being delayed through late summer. With work initially proposed to continue throughout the wildlife refuge period, the Delivery Manager and HMOs worked in liaison with Natural England, the EA and the contractor (Team Van Oord) to establish a successful mitigation strategy for the works. This included delaying the works most likely to cause significant noise and visual disturbance, screening other work areas, reducing noise from cement delivery trucks using acoustic barriers, along with survey effort to monitor the effectiveness of the mitigation. The results of the survey are reported here as Appendix A.

Figure 1. Exmouth tidal defence scheme map.



## **2.2 Habitat Mitigation Officers (HMOs) and Exe wildlife refuges.**

2.2.1 The main focus of the day to day duties of the HMOs remains public engagement and education across the 3 protected sites. Close working with project partners has continued to develop and mature, which is ultimately providing a more effective presence on the ground and a more informed approach to engaging with visitors.

2.2.2 On 15<sup>th</sup> September 2019, the second year of the Exmouth wildlife refuge was initiated, supported by the HMOs, DLD Project Coordinator, other members of the EDDC Growth Point team and the EDDC Countryside team. With new posters and visitor engagement initiatives on site at the Imperial Recreation Ground, as well as articles for the local newspaper, the HMOs reported an increase in positive engagements with people on site.

2.2.3 Despite these considerable efforts, an increased number of disturbance events on the water were reported by the HMOs, the surveyor monitoring the wildlife refuges and members of the public (when compared to the previous year). The results of the second year of monitoring will be reported in summer 2020 but as a result of the perceived increase in disturbance, work is already underway to revise our approach to the refuges for autumn 2020.

2.2.4 Figure 2, below illustrates one of the new engagement initiatives in use, whilst Appendix B contains the design for new posters on display in the public toilets at the Imperial Recreation Ground.

Figure 2. Nature watch feather flag invitation.



2.2.5 Appendix C lists the HMOs key achievements and areas of work during the 2019-20 annual business plan period.

2.2.6 When complete, the results of the visitor access and behaviour monitoring survey (currently on hold due to social distancing requirements) will be used to further understand and refine the awareness of, reach and effectiveness of the HMO presence on site. These roles remain one of the most effective means of delivering key messages to the people using these areas. The Covid-19 pandemic dictates that we must now completely reassess working practices, to enable our officers to continue their work, whilst keeping themselves and the public safe.

### **2.3 Dog project and Pebblebed Heaths codes.**

2.3.1 With DLD now in its' third year of operation, membership continues to increase. Ongoing partnership work has developed into a productive, well-established and coordinated scheme of regular events and guided walks across the region. This is particularly evident with organisations such as the Pebblebed Heaths Conservation Trust, the National Trust and the Forestry Commission, all of whom have maintained their input and realised mutual benefit.

Figure 3. Commercial dog walkers licence, Pebblebed Heaths



Figure 4. DLD members on a "Waggy Walk" with Forestry Commission.



2.3.2 A new Citroen Berlingo has been purchased through the Crown Commercial Services (CCS) vehicle framework. This model was chosen as it fits all the necessary equipment but is no bigger than an average family car. As well as these practical benefits, the livery works well to advertise the scheme across the region. An electric version was researched but due to the lack of recharging points at this point in time, a small (1.5l) diesel engine was selected. To greatly reduce emissions and remove harmful pollutants, the vehicle uses an additive called Adblue which makes it one of the cleanest diesel engines on the market.

Figure 5. New DLD van.



2.3.3 Membership of DLD now stands at 600, with more members joining each month. There are 885 followers on Facebook (a very significant increase of approx. 89% since last April) and 653 on Instagram (increase of 40% in the same period). The website is regularly updated with new events and information about walks, although as the role is part-time there continue to be constraints on the time which the Project Coordinator has to do this.

2.3.4 DLD has also benefitted from the input of additional staff resources to help with additional business development and social media. Prior to lockdown, DLD made excellent progress from the work of an intern who specialises in social media.

2.3.5 As a result of this additional resource, contact with businesses who have signed up to the scheme has been refreshed and the DLD business listings page on the website has a wide range of potential partners who have all agreed to promote the four paws code. Staff are also in sponsorship talks with companies manufacturing compostable dog waste bags and nutritional dog treats. This is aimed at ensuring a responsible environmental footprint as well as reducing scheme costs for items provided to members for free.

2.3.6 Social media interaction has been significantly increased due to the benefit of 1 day a week extra staff resource. Whilst this is (unfortunately) temporary, it does reflect how much more potential the scheme could achieve if further staff

resource could be allocated over and above the current part time post. Changes recorded in the period from 6<sup>th</sup> Feb – 4<sup>th</sup> Mar 2020 are listed below.

STATS	FACEBOOK	6th Feb - 4th Mar
<b>Actions on page</b>	5	<i>up 25%</i>
<b>Page Views</b>	308	<i>up 40%</i>
<b>Page Likes</b>	60	<i>up 22%</i>
<b>Post Reach</b>	11,347	<i>up 22%</i>
<b>Post Engagement</b>	1,505	<i>up 25%</i>
<b>Videos</b>	487	<i>up 436%</i>
<b>Page Follows</b>	65	<i>up 25%</i>

TWITTER		
<b>Tweets</b>	19	<i>up 137.5%</i>
<b>Tweet impressions</b>	11.6k	<i>up 66%</i>
<b>Profile Visits</b>	197	<i>up 101%</i>
<b>Mentions</b>	30	<i>up 328.6%</i>
<b>Follows</b>	431	<i>up 9</i>

2.3.7 Also shown in Appendix D, 2888 people have been recorded at the 55 events, pitstops and guided walks organised by DLD in the year since March 2019, which represents an increase of 44% from the previous year. This has enabled 2069 information packs to be distributed, including key information such as the “four paws” code and how to join the scheme, an increase of 21%.

## 2.4 Pebblebed Heaths visitor access improvements and other work.

2.4.1 As reported to the Jan 2020 meeting of the Executive<sup>14</sup>, a public consultation on proposed visitor access improvements was held for 6 weeks between September-November 2019. Held in partnership with the East Devon Pebblebed Heaths Conservation Trust, this included 2 public events at popular sites on the Pebblebed Heaths and an open evening at Exmouth Town Hall. An online questionnaire was created and a communications plan was implemented to ensure wide coverage of the consultation across a range of media.

Figure 6. Public consultation on the heaths.

---

<sup>14</sup> East Devon Pebblebed Heaths visitor access consultation, January 2020



Figure 7. Open evening, Exmouth Town Hall



2.4.2 Other work on the Pebblebed Heaths has been the creation of illustrations for eventual use on new interpretation boards which will be installed as part of the proposed improvement works. Additionally, the site manager and HMOs have worked with consultants to create a pack of 10 bespoke educational resources for schools which can be downloaded as required. As can be seen in Figure 8, below, they are designed to help schoolchildren think about what impact people have on heathland and what action they can take to prevent it.

**Naomi Harnett**  
**Principal Projects Manager**

**Neil Harris**  
**Habitat Regulations Delivery Manager**

**South East Devon**  
**Habitat Regulations**

Figure 8. Educational resources – worksheet example.

**EARTH STUDIOS**

**ACTIVITIES**

**Earth Studios - Natural Sculpture**

**Key Stage 1** **Key Stage 2**

**AIM** To learn about the work of environmental artist Andy Goldsworthy and create a natural sculpture.

**Props** Clipboards and white paper and pencils or charcoal.

Show examples of the work of Andy Goldsworthy.  
Look at the use of colour and shape.  
Discuss how he only uses natural materials, for example, using thorns/thin twigs to join leaves together/scraping the bark off twigs to reveal variations of colour.  
Pupils can work in small groups.  
Encourage them to think about the material they would like to use and the location of the sculpture (colour of the ground, height, position - floor, in a tree etc).  
Themes may be given to support other school based art work.  
Encourage the children to look at all the artworks - visiting the outdoor art gallery they have all created.  
You may choose to limit the materials used, for example, only 2 colours or different types of leaves.

**Shadow Drawings**

**Key Stage 1** **Key Stage 2**

**Props** Clipboards and white paper and pencils or charcoal.

On sunny days when shadows guaranteed - using a sheet of white paper or the white postcard.  
Place sheet behind a plant to get the shadow of the plant on the sheet.  
Draw round the outline of the plant.

**Pebblebed Postcards**

**Key Stage 2**

**AIM** To create a 2D landscape using natural materials.

**Props** Small blank postcards or similar sized pieces of card (A6), red Triassic soil on pebblebed heaths, charcoal, twig paint 'brushes', water, antiseptic hand wash.

Find a suitable site that has an interesting natural landscape.  
Show the children the charcoal and discuss what it is and how it is formed.  
Demonstrate a few drawing techniques on the blank piece of card using the charcoal.  
Look at the landscape around you and ask the children to find a viewpoint that they like.  
Challenge the children to find other sources of colour from nature - grass, petals, earth.  
Give all the children a piece of charcoal and explain that you would like them to draw the landscape using the charcoal and the other colours they have gathered from nature.  
When they have finished ask the children to write their names on the back in pencil.

**END OF ACTIVITY SESSION** Discuss the beauty of the landscape - why do they like it?  
What might be a problem? Litter, fire?  
What would they do if they were responsible for the land - make it a nature reserve? Build new houses? How could they protect the wildlife? Why is wildlife important?  
Ask each child to make a promise, on what they have discussed. For example, to always pick up litter, help nature or never light fires on the heath.  
Ask them to write it on the back of their natural paintings.  
Collect in the postcards and store them away.  
At the end of the year, give them back out/post to each child as a reminder of the session they had and the promise they made.

**PEBBLEBEDHEATHS.ORG.UK**

**PEBBLEBED HEATHS CONSERVATION TRUST**

**SOUTH EAST DEVON HABITAT REGULATIONS PARTNERSHIP**

Natural England comment:

We note the good progress being made with a wide range of mitigation measures. To be effective in mitigating recreational pressure on the protected sites, most of the measures depend on ongoing public relations and promotion by the team. Their presence on site and on social media remains essential.

# Habitat Regulations Executive Committee

2019/20 Annual Business Plan – Annual Report: Appendix A

## REPORT

### **Exmouth TDS Bird Watching Brief Monitoring Report**

Client: Environment Agency

Reference: IMSW002047-TVO-XX-AA-RP-Z-3057

Status: S0/P01.01

Date: 13 November 2019

## Project related



HASKONINGDHV UK LTD.

Stratus House  
Emperor Way  
Exeter  
EX1 3QS  
Industry & Buildings  
VAT registration number: 792428892

+44 1392 447999 **T**  
+44 1392 446148 **F**  
[info.exeter@uk.rhdhv.com](mailto:info.exeter@uk.rhdhv.com) **E**  
[royalhaskoningdhv.com](http://royalhaskoningdhv.com) **W**

Document title: Exmouth TDS Bird Watching Brief Monitoring Report

Document short title:

Reference: IMSW002047-TVO-XX-AA-RP-Z-3057  
Status: P01.01/S0  
Date: 13 November 2019  
Project name: Exmouth TDS  
Project number: PB6281  
Author(s): Laura Covington

Drafted by: Laura Covington

Checked by:

Date / initials:

Approved by: Peter Thornton

Date / initials: PT 13/11/2019

Classification
Project related



### Disclaimer

No part of these specifications/printed matter may be reproduced and/or published by print, photocopy, microfilm or by any other means, without the prior written permission of HaskoningDHV UK Ltd.; nor may they be used, without such permission, for any purposes other than that for which they were produced. HaskoningDHV UK Ltd. accepts no responsibility or liability for these specifications/printed matter to any party other than the persons by whom it was commissioned and as concluded under that Appointment. The integrated QHSE management system of HaskoningDHV UK Ltd. has been certified in accordance with ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018.

## Table of Contents

<b>1</b>	<b>Introduction</b>	<b>1</b>
1.1	Overview of Scheme	1
1.2	Need for working in wintering bird period	1
1.3	Consultation	1
1.4	Aim of this report	2
<b>2</b>	<b>Methodology</b>	<b>3</b>
2.1	Survey methodology	3
2.2	Frequency	4
<b>3</b>	<b>Results</b>	<b>6</b>
3.1	Core Count Tables	6
3.2	Feedback and additional site observations	14
<b>4</b>	<b>Summary and Conclusion</b>	<b>14</b>

## Table of Figures

Figure 2.1 The location of the works, the location of the core counts and the field of view available (denoted by the red line) from the core count location.	5
Figure 2.2 50m, 100m, 200m, 300m, 400m and 500m buffers from works location	5

## 1 Introduction

### 1.1 Overview of Scheme

- 1.1.1 The Environment Agency is currently upgrading the sea and estuary defences in Exmouth. A tidal defence scheme is required because Exmouth is at significant flood risk, with over 1,400 residential properties and 406 commercial properties at risk in events with a frequency of as low as 1 flood event in 25 years.
- 1.1.2 Without the proposed Exmouth TDS, the consequences of flooding in the Town would be a continuation of the current high levels of flood risk and increasing flood risk in the future due to sea level rise and potentially stormier conditions. Sea level rise could significantly affect Exmouth, as it could be at risk of extreme flooding on a frequency of every 25 years. Wave overtopping is experienced annually, with the onset of some flooding every 10 years.
- 1.1.3 The Exmouth Tidal Defence Scheme (TDS) is located within the Exe Estuary Special Protection Area (SPA) and Ramsar site. Therefore, a shadow Appropriate Assessment has been prepared and submitted to East Devon District Council and the Marine Management Organisation for approval.

### 1.2 Need for working in wintering bird period

- 1.2.1 Initially the Project programme allowed for construction activities to avoid the wintering bird period, however due to delays in construction the works programme has extended. Consultation with the Key Stakeholders (see section 1.3 for details) was undertaken to determine the extent of works allowed during the wintering period, and how works should be managed.

### 1.3 Consultation

- 1.3.1 A site meeting was held with Natural England, East Devon District Council Habitat Regulations Delivery Manager and East Devon District Council Habitat Mitigation Officer on 23<sup>rd</sup> September 2019.
- 1.3.2 At this meeting the stakeholders provided local knowledge of the site and explained the importance of the site. The Exe Estuary in Area A is important for Brent Geese and there is a Voluntary Wildlife Exclusion Zone in place between 15<sup>th</sup> September and 31<sup>st</sup> December to reduce disturbance to birds.
- 1.3.3 The conclusion of the meeting was that the Readi rock works in Area A1, works in Area B and C could continue without mitigation. The spray concrete works in Area A2 would continue with mitigation and monitoring and all other construction works would be delayed until January as they would be too disturbing. The construction compounds are to remain in place.

- 1.3.4 Subsequent to the meeting, a monitoring protocol was agreed to determine whether the works were disturbing the birds.

#### **1.4 Aim of this report**

- 1.4.1 This report provides the findings of the monitoring visits to satisfy Natural England and the East Devon District Council Habitat Regulations Delivery Manager that the works are not significantly disturbing the key features of the Exe Estuary SPA.

## 2 Methodology

### 2.1 Survey methodology

- 2.1.1 The approach to the monitoring follows that adopted by the Exe Estuary Wildlife Refuge Monitoring Programme (Saunders and Liley, 2019). This comprised core counts of birds continued observation over a fixed time period (1 hour and 45 minutes), recording the birds present, human activity, and any interactions between people and birds. The location of the Core Count observation point is shown in Figure 2.1.
- 2.1.2 Each count involved the following elements:
- Two counts of birds, one count at the start and one at the end of the survey period;
  - A diary of all potential disturbance events observed during the 1 hour and 45 minutes following the first count;
  - A record of the response of selected bird species to each of the potential disturbance events recorded in the 'diary', including counts of birds present and the number of birds flushed, etc, and;
  - Any additional information.
- 2.1.3 At the start of each survey visit, a count of the birds present was conducted, comprising all waders, gulls, terns, wildfowl, grebes, divers, and herons/egrets. The count only recorded the birds present within a predefined recording area that extended to a maximum of 500m from the watch point. This area was carefully mapped for each location, using aerial photographs. All mapped areas had a clear line of sight, with their entire extent (within 500m). Survey buffer zones are identified in Figure 2.2.
- 2.1.4 All recreation events (and other potential disturbance events, such as trains, aircraft, contractor work, birds of prey, etc.) which occurred during the following 1 hour and 45 minutes were recorded in a diary format. This diary involved all observed events that could affect birds within the recording area, including those that occurred outside (but still in the vicinity of) the recording area. This was due to the fact that activities above the Mean High Water Mark (MHWM), and events outside the recording area, could still disturb birds. Regardless of whether birds were present or not, all events were recorded in the diary, allowing comparisons of the levels of human activity in different areas.
- 2.1.5 Events in the diary were categorised as a 'potential disturbance event' if:
- It coincided with birds being present within the count area; and,
  - It occurred within 200m of birds within the recording area; or
  - There was a behavioural response recorded for birds within the recording area (i.e. seen to become alert, change position, or were flushed).

- 2.1.6 For each potential disturbance event, the response of the birds was recorded, even if no behavioural response was logged – i.e. if the birds were not visibly disturbed.
- 2.1.7 The disturbance data recorded the number of birds within 200m of the potential source of disturbance, with each group of birds of a given species being recorded as an observation. There could therefore be multiple observations for the same potential disturbance event, for example someone walking across the intertidal zone might pass within various groups of birds of different species.
- 2.1.8 For each observation, behaviour was categorised simply as 1) feeding or 2) roosting / preening / loafing. The response of the birds was categorised, using simple categories ('Alert', 'walk/swim', 'short flight (less than 50m)' 'Major Flight' or 'No Response') and the number of birds falling into each response category recorded. Each observation might therefore involve a range of responses, for example some birds in a flock might remain in situ whilst a part of the flock undertakes a major flight. To simplify the data presentation, we also used single response codes, assigning each observation a single code representing the strongest response observed (e.g. if any of the birds in a group undertook a major flight, major flight would be the single response code assigned to the observation).
- 2.1.9 For each activity/event where disturbance occurred the maximum distance from the birds to the event was estimated, as the straight-line distance from the source of disturbance to the birds. If there was no response from the birds, then the minimum distance from each species present to the disturbance event was recorded (i.e. how close the disturbance event was to the birds). If the birds were in a tight flock, or only a single individual was involved, then this distance was relatively easy to measure. If the birds were scattered over a wide area, and all were disturbed, then the distance from the closest bird to the disturbance was noted. In all cases distances were estimated to the nearest 5m.
- 2.1.10 Additional information provided context and background and included tide times, tide coverage, and weather.

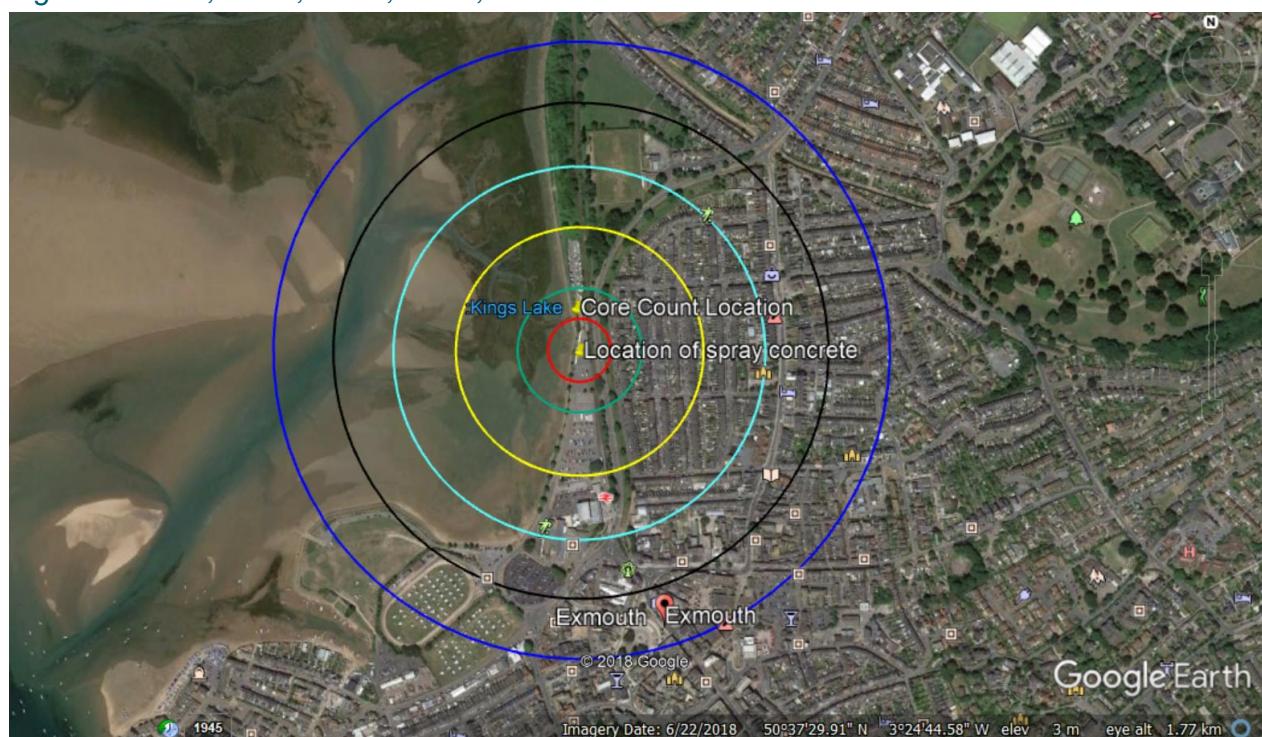
## **2.2 Frequency**

- 2.2.1 The stakeholders requested that the monitoring be undertaken for 3 days over the first week of disturbance with a review after that period.
- 2.2.2 Due to bad weather and high tides, the frequency of concrete pumping was altered and the surveys undertaken to match. Three sets of observations were undertaken on the first day of the concrete pour (9<sup>th</sup> October), and a further set of two observations undertaken on the second day (22<sup>nd</sup> October). These were carried out in a range of tidal and weather conditions.

Figure 2.1 The location of the works, the location of the core counts and the field of view available (denoted by the red line) from the core count location.



Figure 2.2 50m, 100m, 200m, 300m, 400m and 500m buffers from works location



## 3 Results

### 3.1 Core Count Tables

3.1.1 The details of each individual Core Count are presented in this section.

#### 9/10/2019 Observation 1

Background data					
Start Count			Finish Count		
Species	Number	Distance and location	Species	Number	Distance
Gulls	30	300m (duck pond)	Gulls	32	300m (duck pond)
Little egret	0	N/A	Little Egret	1	300m (duck pond)
Brent Geese	10	400m (duck pond)	Brent Geese	10	400 (duck pond)
Oystercatcher	30	400m(duck pond)	Oystercatcher	30	400 (duck pond)
Curlew	0	N/A	Curlew	2	550m (main channel of water)
Swan	8	500m+ (tidal ponds)	Swan	8	500m+ (tidal ponds)
Brent Geese	100	500m+ (tidal ponds)	Brent Geese	300	500m+ (tidal ponds)
Grey heron	1	500m+ (tidal ponds)	Grey heron	1	500m+ (tidal ponds)
Crow	1	500m+ (tidal ponds)	Crow	30	500m+ (tidal ponds)

Time	Activity	Potential response Y/N	Reaction
0920	Concrete wagon arrives	Y	None
0925	Concrete pour starts	Y	None
0935	Dog walker on duck pond	Y	None
0940	Helicopter flyover	Y	None
0941	Tractor moving around boathouse	Y	None
0942	Dogwalkers x 2 on duckpond	Y	None
0950	Dogwalker with 7 loose dogs on the duckpond	Y	5 gulls short flight
0950	2 cocklers	Y	None
0950	Horn beeping at boathouse	Y	None
0950	Incoming train	Y	None

Time	Activity	Potential response Y/N	Reaction
1000	Outgoing train	Y	None
1000	Dogwalker on the duck pond	Y	None
1005	Concrete pour stopped	Y	None
1010	Hammering from boatyard	Y	None
1011	Dog walker on the duckpond	Y	30 gulls short flight
1012	Concrete pour restated	Y	None
1015	Incoming train	Y	None
1020	Concrete pour stopped	Y	None
1024	Ambulance siren	Y	None
1025	Outgoing train	Y	None
1026	Concrete pour restated	Y	None
1027	Large vehicle reversing into boatyard to empty drains (with reversing alarm)	Y	None
1029	2 dogwalkers on duckpond	Y	3 gulls major flight 10 Brent geese major flight
1035	Dogwalker on duckpond	Y	None
1037	Noise of anglegrinder from boatyard	Y	None
1045	Dog walker at the duckpond	Y	5 gulls short flight 3 oystercatcher short walk
1047	End of concrete pour	Y	None
1055	Incoming train	Y	None
1100	Outgoing train	Y	None

**9/10/2019 Observation 2**

<b>Background data</b>					
Start Count			Finish Count		
<b>Species</b>	<b>Number</b>	<b>Distance and location</b>	<b>Species</b>	<b>Number</b>	<b>Distance</b>
Oystercatcher	0	150m (King's lake)	Oystercatcher	9	150m (King's lake)
Brent Geese	15	150m (King's lake)	Brent Geese	10	150m (King's lake)
Gulls	40	300m (duck pond)	Gulls	32	300m (duck pond)
Little egret	1	250m (duck pond)	Little Egret	2	250m (duck pond)
Oystercatcher	250	300m (duck pond)	Oystercatcher	250	400 (duck pond)
Curlew	1	400m (duck pond)	Curlew	2	550m (main channel of water)
Brent Geese	10	400m main channel	Brent Geese	10	400m main channel
Brent Geese	100	500m+(tidal ponds)	Brent Geese	300	500m+ (tidal ponds)

<b>Time</b>	<b>Activity</b>	<b>Potential response Y/N</b>	<b>Reaction</b>
1230	Concrete wagon arrives	Y	None
1235	Concrete pour starts	Y	None
1240	Dog walkers x2 on duck pond	Y	None
1245	Banging noise from boathard	Y	None
1246	Dog walker on duckpond	Y	10 Brent Geese short walk
1250	Incoming train	Y	None
1251	Dog walker on duckpond	Y	10 Brent Geese short flight
1255	Outgoing train with horn	Y	5 Brent Geese short flight
1300	Coash driving up Royal Avenue	Y	None
1305	Dog walker on duckpond	Y	5 gulls short walk
1312	Train horn from Starcross Line	Y	20 oystercatcher alert response
1315	Incoming train	Y	None
1325	Outgoing train	Y	None

Time	Activity	Potential response Y/N	Reaction
1326	Lorry reversing on Royal Avenue with alarm	Y	None
1330	Land Train moving up Royal Avenue	Y	None
1330	Concrete wagon leaves site	Y	None
1340	Motorbike on Marine Way	Y	None
1410	Workforce working on revetment with hand tools	Y	None
1415	2 x kite surfers	Y	None

**9/10/2019 Observation 3**

<b>Background data</b>					
Date: 09/10/2019			Weather: showery, 13°C		
Start Time: 1500			Tide Coverage: Mid to high		
Finish Time: 1645			High Tide: 1630		
<b>Start Count</b>			<b>Finish Count</b>		
<b>Species</b>	<b>Number</b>	<b>Distance and location</b>	<b>Species</b>	<b>Number</b>	<b>Distance</b>
Gulls	20	300m (duck pond)	Gulls	20	300m (duck pond)
Brent Geese	75	300m (duck pond)	Brent Geese	90	400m (duck pond)
Brent Geese	15	400m (duck pond)	Brent Geese	15	400m (duck pond)
Oystercatcher	50	400m (main channel)	Brent Geese	10	400m main channel

<b>Time</b>	<b>Activity</b>	<b>Potential response Y/N</b>	<b>Reaction</b>
1500	Concrete wagon arrives	Y	None
1505	Concrete pour starts	Y	None
1510	Road sweeper on road at Rugby Club	Y	None
1600	Concrete pour stops and wagon leaves	Y	None
1610	Workforce working on revetment with hand tools	Y	None
1630	Excavator arm used to clean up revetment	Y	12 Brent Geese major flight
1635	Excavator arm used to clean up revetment	Y	12 Brent Geese major flight
1640	Excavator arm used to clean up revetment	Y	12 Brent Geese major flight

**22/10/19 Observation 1**

<b>Background data</b>					
Date: 22/10/2019			Weather: light fog, 7°C		
Start Time: 0915			Tide Coverage: Low		
Finish Time: 1100			Low Tide 0607		
<b>Start Count</b>			<b>Finish Count</b>		
<b>Species</b>	<b>Number</b>	<b>Distance and location</b>	<b>Species</b>	<b>Number</b>	<b>Distance</b>
Gulls	28	300m (duck pond)	Gulls	5	300m (duck pond)
Oystercatcher	30	400m (duck pond)	Oystercatcher	20	400 (duck pond)
Oystercatcher	1	30m (on creek)	Oystercatcher	1	30m (on creek)
Brent Geese	200	400m (main channel)	Brent Geese	350	300m (main channel)
Oystercatcher	15	400m (main channel)	Oystercatcher	15	400m (main channel)
Little egret	1	500m+(tidal ponds)	Little Egret	1	300m (duck pond)
Curlew	1	500m+(tidal ponds)	Curlew	2	550m (main channel of water)
Brent Geese	200	500m+(tidal ponds)	Brent Geese	200	300m (main channel)

<b>Time</b>	<b>Activity</b>	<b>Potential response Y/N</b>	<b>Reaction</b>
0915	Concrete wagon arrives and site prep starts	Y	None
0916	Train horn at Starcross	Y	40 Brent Geese short flight
0924	Coach on Royal Avenue	Y	None
0925	Outgoing train	Y	None
0930	Motorbike backfired on Marine Way	Y	200 Brent Geese major flight
0932	Fuel Delivery to Construction compound	Y	None
0935	Concrete por stops and wagon moves 100m	Y	None
0950	Boat towed out of boatyard	Y	None
0950	Incoming train	Y	None
1000	Outgoing train with horn	Y	30 Curlew alert response
1001	Banging noise from small construction compound	Y	None
1000	Crane moving within boatyard	Y	None

Project related



Time	Activity	Potential response Y/N	Reaction
1002	Motorbike on Marine Way	Y	None
1003	Jet washing of revetment	Y	None
1005	Crane moving within boathard	Y	None
1010	Mixing of spray concrete	Y	None
1013	Concrete pour started	Y	None
1015	Crane moving within boathard	Y	None
1016	2x concrete wagons moving along Royal Avenue	Y	None
1016	Crane moving within boathard	Y	2 Curlew major flight
1024	Incoming train	Y	None
1030	Crane moving within boathard	Y	None
1028	Outgoing train	Y	None
1031	Landtrain on Royal Avenue	Y	None
1035	Concreter pour stopped, wagon left site	Y	None
1035	Crane moving within boathard	Y	None
1042	Bin lorry on Royal Avenue	Y	None
1045	Excavator with white noise alarm moving along Royal Avenue	Y	1 Oystercatcher major flight 10 Brent Geese alert response
1048	Incoming train	Y	None
1051	Outgoing train	Y	5 Brent Geese alert response
1055	2 x dogwalkers on duck pond	Y	None

**22/10/19 Observation 2**

<b>Background data</b>					
Date: 22/10/2019			Weather: sunny, 13°C		
Start Time: 1405			Tide Coverage: High		
Finish Time: 1550			High Tide: 1254		
<b>Start Count</b>			<b>Finish Count</b>		
<b>Species</b>	<b>Number</b>	<b>Distance and location</b>	<b>Species</b>	<b>Number</b>	<b>Distance</b>
Gulls	0	300m (duck pond)	Gulls	5	300m (duck pond)
Little egret	1	300m (duck pond)	Little Egret	8	300m (duck pond)
Brent Geese	200	400m (duck pond)	Brent Geese	45	400 (duck pond)
Brent Geese	0	300m (main channel)	Brent Geese	350	300m (main channel)
Swan	21	500m+ (tidal ponds)	Swan	8	500m+ (tidal ponds)
Little egret	2	500m+(tidal ponds)	Little egret	0	500m+(tidal ponds)
Brent Geese	300	500m+(tidal ponds)	Brent Geese	300	500m+(tidal ponds)
Oystercatcher	5	500m+(tidal ponds)	Oystercatcher	1	500m+(tidal ponds)

<b>Time</b>	<b>Activity</b>	<b>Potential response Y/N</b>	<b>Reaction</b>
1406	Concrete wagon arrives	Y	None
1407	2 x stand up paddleboarders at the exclusion zone boundary	Y	None
1414	Aeroplane flyover	Y	None
1416	Incoming train	Y	None
1424	Outgoing train	Y	None
1426	Motorbike backfire	Y	10 Oystercatcher major flight
1429	Helicopter flyover	Y	100 Brent Geese alert response 20 Brent Geese major flight
1430	1 stand up paddleboarder moves inside the exclusion zone and then leaves again	Y	None
1447	Incoming train	Y	None
1453	Dogwalker in the duckpond	Y	350 brent geese major response
1454	Outgoing train	Y	None
1505	Motorbike on Marine Way	Y	None

Time	Activity	Potential response Y/N	Reaction
1515	Outgoing train	Y	None
1520	Boat moved out of boatyard	Y	None
1521	Concrete pour stopped and wagon moved a short distance	Y	None
1423	Incoming train	Y	5 Brent geese alert response
1436	Aeroplane flyover	Y	None
1437	Crane moving in boatyard	Y	None
1439	Aeroplane flyover	Y	10 Brent Geese major flight

### 3.2 Feedback and additional site observations

3.2.1 In addition to the observations made above, the local Habitats Mitigation officer provided the following feedback.

- There is occasionally banging noises from the small construction compound which causes an alert response to the Brent Geese.
- The Brent Geese appear to be foraging away from where works are being undertaken which is why limited disturbance is occurring.
- Whilst there is disturbance happening, it is limited to one direction as the access between the Imperial Recreation Ground Slipway and the Duckpond has been stopped up during construction.
- The gap in the fencing is causing an alert response to Brent Geese.

3.2.2 Subsequent to the above monitoring and observations, a spot check site visit was undertaken on 11<sup>th</sup> November 2019. At this visit the works to the revetment had shifted towards the southern extent, approximately 250 Brent Geese were observed feeding on the eelgrass that they had previously been avoiding.

## 4 Summary and Conclusion

4.1.1 Most of the construction activities are not affecting Brent Geese. The only event linked to Exmouth TDS during the Core Counts was the use of an excavator arm to clean up the revetment at high tide which caused a major response to 36 birds. The site team have been instructed to cease this action to avoid further disturbance.

4.1.2 We consider that this report provides sufficient evidence that Brent geese are not significantly affected and that Exmouth TDS team can cease monitoring.

## Habitat Regulations Executive Committee

2019/20 Annual Business Plan – Annual Report: Appendix B



Keep it special for years to come ...



SOUTH EAST DEVON  
HABITAT REGULATIONS  
PARTNERSHIP



## **Habitat Regulations Executive Committee**

### 2019/20 Annual Business Plan – Annual Report: Appendix C

- Developed our education program and have been seeking out different groups to offer classes to, as per the activities listed below:
- Led a wildlife activity with Exminster Beavers (scouts)- “Estuary wildlife on your doorstep”
- Led a wildlife activity with Exminster Cubs (scouts) – “Estuary wildlife and disturbance”
- Presentation to the Friends of the Common forum for Pebblebed Heaths Conservation Trust (PHCT).
- Mitigation talk to Exmouth Devon Wildlife Trust local group re: Exe estuary.
- Mitigation talk for Shillingford wildlife group.
- Pop up displays at the Exmouth duck pond in the lead up to the start wildlife refuge – at least one pop up a week for a month. Continuation of pop ups during the refuge season as well as patrolling on the majority of high tides in order to educate and engage with the public.
- Daily interactions logged on SNAP monitoring software.
- Multiple articles written for the Exe Estuary Management Partnership newsletter ‘Exe Press’.
- Article written for local newspaper ‘Exmouth journal’.
- We had ITV come out on the boat with us so we could talk about the success and issues surrounding the wildlife refuge. We had a lot of positive feedback from members of the public that had seen the broadcast.
- We met with the Devon Wildfowling & Conservation Association group on the Exe to get a better understanding of their activities on the estuary.
- Sama went on maternity leave in November. Will joined us to cover Samas’ maternity and has been working hard to learn the role and attend the relevant training needed for the job role.
- We renewed our Community Safety Accreditation Scheme (CSAS) affiliation with Devon & Cornwall Police and created a video for the police to use for training. The video is used to demonstrate how the accreditation can be of benefit to various organisations.
- Fed back on the carpark consultation on the Pebblebed Heaths and assisted with pop ups throughout the consultation process answering publics queries.
- We have been reviewing our social media and how effective each of our different approaches are. It has been a good medium for topical posts such as raising awareness of the wildlife refuges.
- Fed into changes to the Exmouth flood defence work taking place at the Duck pond to reduce impact on overwintering birds.
- Assisted with Dawlish Warren junior rangers ‘signs of autumn’ event.
- Attended Bassett's primary school with EDDC countryside team. Educating two year 1 classes on the changes in the season and looking out for signs of autumn.
- Assisted with Heath week family festival day.

- Helped to create self-guided walks to be used during heath week along with the PHCT.
- Assisted with multiple Nightjar walk with the RSPB – partnership working
- Assisted with Devon Wildlife Trust family fun day at Bystock.
- Assisted with RSPB bat moth and nightjar walk with families.
- Assisted with events that Devon Loves Dogs have attended such as the Devon County Show, Killerton apple and cider festival and dog walks. It provides assistance but also gives us the opportunity to get our core messages out to the public. It helps to refresh both of our knowledge on each other's projects and know what our key messages are each season.

## Habitat Regulations Executive Committee

### 2019-20 Annual Business Plan - Annual Report: Appendix D – Devon Loves Dogs interactions 2019-20

Event name	Date(s)	Location	Packs distributed	People spoken to
Lambing Sunday	17/03/2019	Bicton College	154	300
Heaths Pop Up Week	25-31/03/2019	Heaths car parks	87	301
Waggy Walk	04/04/2019	Model Air	1	3
Pitstop	16/04/2019	Dawlish Warren	67	38
Pitstop	18/04/2019	Homeyards, Shaldon	31	45
Pitstop	21/04/2019	Bicton Arena Horse Trials	29	65
Pitstop	01/05/2019	Mutters Moor	12	16
Waggy Walk	11/05/2019	Wheathill to Bystock	11	17
Big Doggy Day Out	12/05/2019	Bicton College	124	260
Devon County Show	16/05/2019	Westpoint	96	124
Devon County Show	17/05/2019	Westpoint	125	218
Devon County Show	18/05/2019	Westpoint	142	134
Donkey Sanctuary Fun Day	26/05/2019	Donkey Sanctuary	128	65
Waggy Walk & Pit Stop	30/05/2019	#inhoniton events week	18	8
Pit Stop	04/06/2019	Killerton - Ellerhayes	27	48

Waggy Walk	12/06/2019	Ashclyst - Forest Gate	0	7
Waggy Walk	15/06/2019	Four Firs Car park	0	7
Broadclyst Fun Day	22/06/2019	Fun Day & Dog Show	71	55
Waggy Walk	25/06/2019	Whitecross Car Park		5
Pit Stop	27/06/2019	Dawlish Warren NNR	36	53
Pit Stop	04/07/2019	Dawlish Warren NNR	24	33
Waggy Walk	11/07/2019	Harpford Woods, Newton Pop.		6
Family Festival Day	28/07/2019	Woodbury Castle	30	28
Bystock Doscovery Day	30/07/2019	Bystock Meadows	7	6
2nd Birthday Waggy Walk	03/08/2019	Start Warren car park	16	24
National Playday	07/08/2019	Courtney Park	55	18
Pooches at the Priory	11/08/2019	St Katherines Priory, Exeter	45	43
Pit Stop	22/08/2019	Imperial Rec.	20	22
Waggy Walk	05/09/2019	Stantyway Farm Otterton	0	6
Goodie bags	05/09/2019	Westclyst Fun Day & Dog Show	50	
Dog Show	07/09/2019	Paws for the Cause	38	41
Waggy Walk	10/09/2019	Core Copse, East Hill Strips	4	7

Pit Stop	12/09/2019	Imperial Recreation Ground.	39	43
Pit Stop	16/09/2019	Imperial Recreation Ground.	25	26
Beach Opening	01/10/2019	Sidmouth Beach.	22	40
Waggy Walk	03/10/2019	Mutters Moor.	0	8
Big Teignmouth Dog Walk	06/10/2019	Teignmouth Den.	64	41
Killerton Apple Festival	12/10/2019	Killerton.	78	130
Killerton Apple Festival	13/10/2019	Killerton.	98	150
Consultation event	17/10/2019	Joney's Cross.	3	10
Pitstop	22/10/2019	Dawlish Warren.	70	96
Halloween photos	27/10/2019	Sidmouth beach.	12	20
Waggy Walk	02/11/2019	Model Airplane.	2	3
Waggy Walk	19/11/2019	Ashclyst - Forest Gate.	0	13
Pitstop	26/11/2019	Exmouth Duckpond.	0	13
Waggy Walk	05/12/2019	Joney's Cross.	6	7
Pitstop	11/12/2019	Model Air.	37	37
Bark In The Dark	21/12/2019	Haldon Forest.	53	75
Pitstop	28/12/2019	Near Castle car park.	27	37
Waggy Walk	11/01/2020	Bovey Down, near Beer	0	9

Presentation	23/01/2020	CDE Office	0	15 commercial walkers
Waggy Walk	13/02/2020	Wheat Hill	3	5
Muddy Mutts	23/02/2020	River Dart Country Park	80	100
Waggy Walk	25/02/2020	East Hill, Core Copse	2	4
Waggy Walk	05/03/2020	Mutters Moor	0	3
<b>Total</b>	-	-	<b>2069 (+21%)</b>	<b>2888 (+44%)</b>

## Habitat Regulations Executive Committee

2019/20 Annual Business Plan – Annual Report: Appendix D

# Devon Loves Dogs Newsletter



## Paws up!

Welcome to the woofly winter newsletter. I don't know about you, but sometimes it's hard to find the motivation to get outdoors at this time of year. But once I've got my coat and boots on, my walk with Maisie is often my favourite part of the day. If you're looking for a new place to walk and with a small group, why not join us on one of our Waggy Walks?

We walk at least once a month in lots of different places across South East Devon. They're free, last around an hour and a half and everpawdy is welcome. Dogs have plenty of off-lead time to play but if your dog just fancies a plod and a sniff that's great too! See all of the walks on our [facebook page](#) and [website](#).

## Upcoming events



### Ashclyst Forest Waggy Walk

**Tuesday 24th March**

Join us with National Trust Rangers for a walk around the Forest. Don't forget to wear your wellies!

[Read More](#)



### Four Firs Waggy Walk

**Saturday 11th April**

Come along for Easter fun on the Pebblebed Heaths, where your dog can sniff and play.

[Read More](#)



Bird nesting season starts soon on the Pebblebed Heaths. From 1st March, Dartford Warblers will start nesting low to the ground on dense gorse or heather. They lay their eggs towards the end of March which will hatch after 14 days. Nightjars start to arrive in April from Africa and lay eggs straight onto the bare ground during May, but they are very well camouflaged. To help these birds thrive, we can make a big difference by keeping our dogs on the paths and out of the gorse. We're lucky to have such a huge network of wide paths across the heaths, which makes it easy.

## Member's corner

Teddy and Mabel joined Devon Loves Dogs in October. Don't forget to send us your photo for the members' gallery on our website. Email your photo to [woof@devonlovesdogs.co.uk](mailto:woof@devonlovesdogs.co.uk) with your dog's name.



## Business partners



Could you be our business partner? We're looking for businesses to [feature on our website](#) and appear in our newsletters, so if you have something to offer in return for marketing your dog-friendly products, [get in touch!](#) All our partners sign up to the Four Paws Code. If you can promote the code, with leaflets or on social media, please let us know: [devonlovesdogs.co.uk/four-paws-code](http://devonlovesdogs.co.uk/four-paws-code)

### Puppy love

Did you see our social media campaign for Valentine's Day showing our friends' and fur-pals' love for each other? Follow us on Facebook, Instagram and Twitter to get involved and send us your pics!





SOUTH EAST DEVON  
HABITAT REGULATIONS  
PARTNERSHIP

# South East Devon Habitat Regulations Executive Committee

## *Financial Report*

*Naomi Harnett,  
Principal Projects Manager,*

*Neil Harris,  
Habitat Regulations Delivery Manager,*

*Growth, Development & Prosperity,  
East Devon District Council  
July 2020*

**Legal comment/advice:**

There is no direct legal comment to be made at this time, each and any individual issue will need to be considered as it arises.

**Finance comment/advice:**

The financial implications are set out in the report.

<b>Public Document:</b>	Yes
<b>Exemption:</b>	None
<b>Review date for release</b>	None

## Recommendations

**It is proposed that the Executive Committee:**

1. Notes the update on the overall financial position including contributions received, expenditure and anticipated contributions (from CIL and signed S106).
2. Notes the potential for significant changes to anticipated contributions due to disruption to housing delivery as a result of the Covid-19 pandemic.
3. Notes the expenditure against budget for the 2019-20 Annual Business Plan and reasons given for any variance.
4. Receives a further report regarding anticipated contributions at the next meeting of the Committee.

Equalities impact: Low

Risk: Low

This is an update, repeated every 6 months, on the current financial position of developer contributions (both collected and anticipated) for Habitat Regulations mitigation across the three partner authorities.

### 1. Summary

1.1 The purpose of this report is to update members of the Executive Committee on the overall financial position of developer contributions received by the partner authorities as mitigation payments towards measures identified in the South East Devon European Site Mitigation Strategy (“the Strategy”).

1.2 The report sets out details of the contributions received from inception to date and anticipated income from contributions where planning permission has been granted but the contribution has not yet been paid. Details of expenditure against the 2019/20 Annual Business Plan, as well as total expenditure to date are also provided.

1.3 Housing forecasts have been provided from each partner authority and are reported in Table 3. Undertaken prior to the lockdown of March 2020, they therefore do not take into account the subsequent disruption to housing delivery. It is anticipated that there will be significant changes to the forecasts but it is too early to be able to quantify this with any degree of certainty. Income projections as reported have been used to assist in outlining the indicative 5 year Delivery Plan, reported separately.

1.4 Updated housing forecasts to account for the relevant economic impacts of the Covid-19 pandemic will be important in order to understand what impacts there may be to the 5 year Delivery Plan. It is recommended that updated projections are reported at the next meeting of the Committee, alongside consideration of the likely consequences on delivery of the Strategy and a revised Plan.

**Table 1.** Developer contributions received (less expenditure) to date.

Charging zone/period	Total received to date	Total expenditure to date	Balance to date
SANGS	£3,399,714	-£3,485,605	<b>-£85,891</b>
Dawlish Warren On site	£736,825	-£214,703	<b>£522,122</b>
Exe Estuary On site	£359,183	-£278,904	<b>£80,279</b>
Pebblebed Heaths On site	£323,196	-£197,811	<b>£125,385</b>
EDDC CIL <sup>1</sup>	£351,187	£15,000	<b>£336,187</b>
Cranbrook agreement <sup>2</sup>	£222,727	£0	<b>£222,727</b>
<b>Total</b>	<b>£5,392,834</b>	<b>-£4,192,022</b>	<b>£1,200,811</b>

<sup>1</sup> This is the sum reserved for measures identified by EDDC as infrastructure. Therefore it can be spent as appropriate on SANGS or on site infrastructure.

<sup>2</sup> This agreement relates to mitigation payments for the first tranche of development at Cranbrook, which was calculated using a method different to the rest of the Strategy. Therefore it does not neatly fit into the other categories used..

**Table 2.** Position of all developer contributions from planning consents granted but not yet received to date.

Charging zone / project category	Position to date
Dawlish Warren on-site	£116,609
Exe Estuary on-site	£152,300
Pebblebed Heaths on-site	£149,900
SANGS	£557,108
<b>Total</b>	<b>£975,917</b>

**Table 3 – 5 Year forecast of income/housing delivery.**

Year	Dawlish Warren	Exe Estuary	Pebblebed Heaths	SANGS	EDDC CIL
<b>20-21</b>	£26,048	£165,158	£219,452	£673,728	£126,258
<b>21-22</b>	£76,736	£154,533	£181,093	£573,562	£108,897
<b>22-23</b>	£77,440	£216,038	£164,790	£547,404	£106,827
<b>23-24</b>	£133,760	£215,346	£177,152	£623,326	£120,804
<b>24-25</b>	£151,360	£218,932	£197,030	£874,698	£143,106
<b>Total</b>	<b>£465,344</b>	<b>£970,007</b>	<b>£939,517</b>	<b>£3,292,718</b>	<b>£605,892</b>

1.5 Table 4, below, shows the estimated expenditure on the 2020/21 ABP and projected remaining balance at the end of 2024/25.

**Table 4 – Recommended expenditure and projected balance of funds as at end 2024/25.**

Year	Dawlish Warren spend	Exe Estuary spend	Pebblebed Heaths spend	Total spend
<b>2020-21</b>	£72,499	£113,344	£274,379	<b>£460,222</b>
<b>2021-22</b>	£49,362	£65,249	£222,289	<b>£336,900</b>
<b>2022-23</b>	£63,932	£93,632	£242,908	<b>£400,471</b>
<b>2023-24</b>	£60,040	£74,240	£73,516	<b>£207,796</b>
<b>2024-25</b>	£60,040	£68,240	£73,516	<b>£201,796</b>
<b>Total</b>	<b>£305,873</b>	<b>£414,705</b>	<b>£886,608</b>	<b>£1,607,186</b>
<b>Remaining balance at end 2024-25</b>	<b>£777,794</b>	<b>£765,723</b>	<b>£856,912</b>	<b>£2,405,429</b>

## 2. Expenditure against Annual Business Plans (ABP)

2.1 As shown in Table 5, there are a number of mitigation measures which are subject to delay, as reported separately<sup>3</sup>.

**Table 5.** Mitigation measures currently subject to delay.

Site	Measure	Capital cost	Expenditure (Actual)	Variance +/-
Dawlish Warren	Byelaw preventing fires and barbeques in buffer zone	£2,000	£0	+£2,000 <sup>4</sup>
Dawlish Warren	Visitor Management Plan	£12,000	£0	+£12,000 <sup>5</sup>
Dawlish Warren	Reed screening between Bight & Golf Course	£10,000	£0	+£10,000 <sup>6</sup>
Dawlish Warren	Monitoring of accretion and erosion	£1,000	£0	+£1,000 <sup>7</sup>
<b>Sub total</b>		<b>£86,500</b>	<b>-£9,190</b>	<b>+£77,310</b>

2.2 The continuing cross-site mitigation measures are shown in Table 6, below. The largest variance in expenditure (staff and other project costs) is accounted for because the data does not include the 4<sup>th</sup> quarter of the 19-20 financial year.

**Table 6.** Cross site mitigation and expenditure recommended as part of the 2019/20 ABP.

Site	Measure	Revenue budget	Expenditure (Actual)	Variance +/-
All	Staff, Dog project, vehicles, boat, tax, insurance, fuel, maintenance.	£149,130	£122,514	+£26,616 <sup>8</sup>

2.3 Expenditure on all site specific mitigation measures either completed or initiated is shown below in Table 7. As indicated by the “(Total) SEDESMS budget” column,

<sup>3</sup> Annual Business Plan – Progress Report, April 2020.

<sup>4</sup> Evidence gathering still underway, no recent incidents reported.

<sup>5</sup> Some measures at Dawlish Warren are on hold pending further discussion with TDC and EA.

<sup>6</sup> Some measures at Dawlish Warren are on hold pending further discussion with TDC and EA.

<sup>7</sup> This is undertaken by the Environment Agency as part of the Beach Management Scheme until at least 2021.

<sup>8</sup> Data does not include Q4 of the current financial year.

the majority of these measures all have an element of ongoing funding allocated for revisions and/or maintenance in future years.

2.4 Exe wildlife refuge disturbance monitoring is ongoing (with a pause during the lockdown in March 2020) and the South East Devon Visitor Survey had been initiated prior to the lockdown but is now on hold until further notice due to social distancing requirements. They are being invoiced according to agreed schedules as appropriate.

**Table 7.** Expenditure on completed/initiated mitigation measures.

Site	Measure	Initial budget	Expenditure (Actual)	Variance +/-	(Total) SEDESMS budget	(Remaining) SEDESMS budget
Dawlish Warren	Petalwort monitoring	£1,000	£1,608	-£608	£26,667	£25,059
Dawlish Warren	Carry out audit of information boards	£11,500	£11,272	+£228	£19,500	£8,228
Dawlish Warren	BBQ info at local retailers	£2,000	£0	+£2,000 <sup>9</sup>	£6,000	£6,000
Dawlish Warren	Monitoring of vegetation change	£5,000	£0	+£5,000 <sup>10</sup>	£133,333	£133,333
Exe Estuary	Codes of conduct	£11,500	£10,720	+£780	£11,500	£780
Exe Estuary	Wildlife refuge consultation	£5,000	£9,186	-£4,186	£5,000	-£4,186
Exe Estuary	Disturbance monitoring - Refuges	£20,000	£11,034	+£8,966 <sup>11</sup>	£30,000	£18,966
Exe Estuary	Wildlife Refuge buoy markers.	£5,000	£16,387	-£11,387	£30,000	£13,613
Exe Estuary	Update signs at public slipways	£40,000	£16,154	+£23,846 <sup>12</sup>	£120,000	£103,846
Exe Estuary	New interpretation boards	£5,000	£0	+£5,000 <sup>13</sup>	£112,500	£112,500

<sup>9</sup> Design of posters completed in-house @ TDC.

<sup>10</sup> Draft survey now complete following unavoidable delays at consultants. Not yet invoiced.

<sup>11</sup> Awaiting invoice for current year.

<sup>12</sup> Economies of scale achieved in procurement, further behavioural change spend recommended.

<sup>13</sup> Requires further discussion with EDDC StreetScene.

Site	Measure	Capital cost	Expenditure (Actual)	Variance +/-	(Total) SEDESMS budget	(Remaining) SEDESMS budget
Pebblebed Heaths	Dog bins	£13,480	£4,465	+£3,370 <sup>14</sup>	£273,100	£268,635
Pebblebed Heaths	Educational resources	£4,656	£4,590	+£66	£46,560	£41,970
Pebblebed Heaths	Pebblebeds Codes of conduct	£4,000	£4,000	-	£6,000	£2,000
Pebblebed Heaths	Signs directing people	£6,500	£0	+£6,500 <sup>15</sup>	£6,500	£6,500
Pebblebed Heaths	Signs related to conduct	£6,600	£0	+£6,600 <sup>16</sup>	£6,600	£6,600
Pebblebed Heaths	Path monitoring/repair	£12,000	£5,269	+£6,731 <sup>17</sup>	£95,000	£89,731
Pebblebed Heaths	Interpretation Boards	£5,000	£510	+£4,490 <sup>18</sup>	£64,800	£64,290
Pebblebed Heaths	Changes to car parks (preliminary survey)	£15,000	£15,000	-	£15,000	£0
All	Visitor survey	£12,422	£1,138	+£11,284 <sup>19</sup>	£167,000	£165,862
<b>Sub total</b>		<b>£185,658</b>	<b>£111,333</b>	<b>+£74,325</b>	<b>£1,175,060</b>	<b>£1,063,727</b>

Naomi Harnett,  
Principal Projects Manager,

Neil Harris,  
Habitat Regulations Delivery Manager,

Growth, Development & Prosperity,  
East Devon District Council  
July 2020

<sup>14</sup> Economies of scale achieved during installation, annual costs include maintenance/repair (not yet required). Awaiting invoice for 2019/20.

<sup>15</sup> Integral to wider car parking strategy proposals.

<sup>16</sup> Integral to wider car parking strategy proposals.

<sup>17</sup> Works are ongoing according to the schedule outlined in the initial audit.

<sup>18</sup> Preliminary design/illustration work complete, delivery dependent on outcome of Car Park Strategy.

<sup>19</sup> Initial surveys completed and initial invoice received. Further surveys on hold due to Covid-19 social distancing guidelines.

Natural England comment:

Natural England have reviewed the report and have nothing further to add.



SOUTH EAST DEVON  
HABITAT REGULATIONS  
PARTNERSHIP

# South East Devon Habitat Regulations Executive Committee

## *Risk Register Report*

Neil Harris, Habitat Regulations Delivery Manager  
July 2020

Legal comment/advice:

There is no direct legal comment to be made at this time, each and any individual issue will need to be considered as it arises.

Finance comment/advice:

The financial implications are set out in the report.

<b>Public Document:</b>	Yes
<b>Exemption:</b>	None
<b>Review date for release</b>	None

## Recommendations.

**It is proposed that the Executive Committee:**

1. Notes the identification, categorisation and prioritisation of risks as recorded in the accompanying Risk Register, associated with delivery of the South-east Devon European Site Mitigation Strategy.
2. Notes in particular the Severe risk posed by the Covid-19 pandemic.
3. Notes the control measures in place to mitigate the risks identified.
4. Receives an updated Risk Register report in 6 months.

Equalities impact: Low

Risk: Medium/High.

As a society we continue to experience the impacts of the Covid-19 pandemic and therefore it is too soon to be able to quantify the impacts (current & future) to the delivery of the Strategy. However, considering the gravity and scale of the pandemic it is considered appropriate to classify this as the highest risk (Severe) to the majority of the categories used. Additionally, there remain a number of risks which have the potential for high strategic and operational impact, if not carefully addressed. Continued partnership working, use of updated housing forecasts and keeping updated on changes in the operational environment will assist in mitigating these risks. Continued and effective delivery of the Strategy and the development this enables remains of very high importance to all partners.

## 1 Summary

1.1 As part of the project development of the South-east Devon European Site Mitigation Strategy (“the Strategy”), a detailed risk register (see Appendix A) is used to take account of the various categories of risk that exist or emerge in all elements of the Strategy. This was developed as part of a set risk management process.

1.2 It is important to note that the purpose of a risk register is to record the details of all risks that have been identified along with their analysis and plans for how those risks will be treated. It does not necessarily mean that the risks will be realised or are expected to occur (unless specifically noted).

1.3 The purpose of the report is to update members of SEDHREC on the status of the risk management register and the status of risk management across the partner authorities at this time.

1.4 The register also includes “inactive” risks which have either expired or are no longer considered a risk to the delivery of the Strategy.

## **2. Identifying Risks**

2.1 Risk is categorised in relation to the aims and objectives of SEDHREC (i.e. delivering the Strategy). The main categories used in this register are:

- ) Strategic;
- ) Operational;
- ) Financial;
- ) People;
- ) Regulatory;
- ) Governance.

2.2 Strategic: This considers external risks which may affect the aims and objectives of SEDHREC - such as changes in the environment within which it operates.

2.3 Operational: This considers the risks which arise from the services delivered or the activities carried out.

2.4 Financial: This section considers any potential financial risks facing the organisation in terms of internal systems, planning, funding, etc.

2.5 People: These risks are associated with the employment of staff and the involvement of volunteers.

2.6 Regulatory: These risks consider the legislative framework within which SEDHREC operates.

2.7 Governance: This section identifies the risks which are part of the management of SEDHREC.

There may be a degree of overlap between some of these categories.

## **Classification**

3.0 In addition to the identification of risks as outlined above in 2.0 – 2.6, risks to the successful implementation of the Strategy are also categorised. The probability of a risk occurring and the potential impact of that risk is assessed and recorded on a scoring matrix (see Appendix B). This assigns categories accordingly:

- ) Minor (1 to 4)
- ) Moderate (5 to 8)
- ) Major (9 to 12)
- ) Severe (13 to 16)

3.1 The matrix shown in Appendix B illustrates that the Covid-19 pandemic poses a Severe risk to the delivery of the Strategy.

3.2 There are 4 further risks classified as Major for their potential impact and probability of occurring. They are:

- ) Proposed SANGS at Cranbrook do not meet essential criteria.
- ) Habitat Regulations watered down / abolished following exit from European Union.
- ) Delays to mitigation measures identified in annual business plans
- ) HREC decisions not implemented at local level.

3.3 Mitigation of each of these identified risks are described within the risk register itself (see Appendix A). The register is as updated from April 2019 and will continue to be updated and reported to the Committee on a regular basis.

3.4 Should any further risks to delivery of the Strategy be assessed as Severe at any stage, this will be reported to the Officer Working Group and SEDHREC as and when necessary.

**Neil Harris**  
**Habitat Regulations Delivery Manager**

**South East Devon  
Habitat Regulations  
Executive Committee  
July 2020**

Natural England comment:

Natural England have reviewed the report and have nothing further to add.



## Habitat Regulations Executive Committee

### Risk Register 2020: Appendix A

ID	Description	Category	Probability	Impact	Proximity	Response Category	Response	Risk Status	Risk Owner	Risk Actionee
1	Covid-19	Operational Strategic Financial People	High	High	Current	Reduce Fallback Avoid	Ensure safety of public-facing team, work with partners to re-establish on-site presence. Maintain constant review of procedures, amend as necessary. Compile housing delivery data when available, incorporate into revised finance forecasts, consider impact on 5yr Delivery Plan. Report impacts to existing mitigation projects.	Active	Partner LPA / Staff	Partner LPA / Staff
2	Delays to mitigation measures identified in annual business plans	Operational	High	Medium	Within project	Reduce	Ensure regular contact with site/land managers to identify causes of delay and revised completion dates. Work with stakeholders to minimise delays and identify remedial action if necessary. Notify Offer Working Group (OWG) and HREC via progress reports.	Active	HRDM	HRDM/ Stakeholders
3	Proposed SANGS at Cranbrook do not meet essential criteria.	Strategic	Medium	High	Within stage	Fallback	Appropriate input from EDDC planning dept & liaison with Consortium to ensure proposed SANGS meet required standards. Liase with NE to understand their position. Planning permission for expansion areas cannot be given until this key requirement is met.	Active	Consortium / EDDC	Consortium / EDDC

4	Regulations amended following exit from EU	Regulatory	Medium	High	Within stage	Accept	Keep up to date with changes to legislation. Plan contingency response as part of Strategy review.	Active	HRDM	TDC/ECC/EDDC
5	HREC decisions not implemented at local level.	Strategic	Medium	High	Within stage	Reduce	Close liaison with LPA Planning Delivery Officers to ensure good working relationship and understanding. Training for LPA staff with presentations reemphasising importance of implementing Strategy to whole Council. Regular briefings to Members and leadership.	Active	Partner LPA / HRDM	Partner LPA / HRDM
ID	Description	Category	Probability	Impact	Proximity	Response Category	Response	Risk Status	Risk Owner	Risk Actionee
6	Dawlish Warren coastal realignment	Strategic Operational	High	Medium	Within stage	Accept Fallback	Liaise with Environment Agency, Natural England and TDC to understand existing control measures, timescales. Agree new / amended mitigation as appropriate.	Active	SEDHRP / TDC / NE	SEDHRP / TDC / NE
7	Housing market crash.	Financial	Medium	High	Within stage	Accept	Technically, fewer houses mean fewer impacts and therefore less mitigation is required. However, potential impact to longer term measures which are forward funded in expectation of future developer contributions. Understand how many dwellings are still to contribute & review costs.	Active	Partner LPA / HRDM	Partner LPA / HRDM
8	Developer contributions not paid	Financial	Medium	Medium	Within stage	Reduce	LPA planning departments responsible for ensuring contributions are paid. Enforcement measures should be undertaken if not paid.	Active	Partner LPA	Partner LPA
9	Expiration of planning obligations / repayment of contribution to developers	Financial	Medium	Medium	Within stage	Reduce	LPA planning departments responsible for monitoring status of planning obligation compliance & expiration. Ongoing review of financial monitoring data from LPAs by accountants and HRDM.	Active	Partner LPA / HRDM	Partner LPA / HRDM

							Expirations identified in advance and prioritised for payment.			
10	Insufficient funding to contribute to Dawlish Warren Visitor Centre	Financial	Medium	Medium	Within project	Reduce	Increased frequency of housing forecasts to signal any changes to income. Reprioritise projects to accommodate if appropriate. Seek forward funding if necessary. Keep project manager/s informed of forecasts.	Active	HRDM	HRDM
11	Users refuse to respect Wildlife Refuges	Operational	Medium	Medium	Within project	Reduce	HMO presentations to user groups prior to start of peak season. Signage, interpretation, patrol boat and codes of conduct in place. Monitoring of WRs with annual reports. If no other option following initial 3 year period, investigate statutory restrictions.	Active	HRDM	HRDM
12	Patrol Boat/4x4 accident / vandalised	Operational	Medium	Medium	Within project	Reduce	Mandatory job related training. Vehicles insured and stored according to Council policy.	Active	HRDM	HRDM
13	Mitigation strategy measures insufficient to prevent significant effects to protected sites.	Strategic	Low	High	Within project	Avoid	Regular and established monitoring of key species and habitats, as well as visitor numbers and behaviour, will establish whether the measures implemented are sufficient to prevent impacts from effecting the sites. Further and/or different measures to be considered if/when necessary.	Active	Partner LPA / HRDM	Partner LPA / HRDM
14	One of the partner authorities withdraws from approach	Strategic	Low	High	Within project	Avoid	HRDM to continue to work closely with each partner. Demonstrate effective delivery and value for money. Ensure understanding of consequences of no mitigation. Understand needs, expectations, and budgets. Ensure delivery of key projects to demonstrate benefits to all.	Active	Partner LPA / HRDM	Partner LPA / HRDM

(Intentionally left blank)

15	Loss of experienced staff – Delivery Manager / HMOs / DLD	People	Medium	Medium	Within project	Fallback	Ensure good understanding of Strategy within existing team. Communicate approach, aims and objectives widely across 3 authorities. Ensure attendance at officer workshops. Hold regular 1:1 meetings to discuss roles, issues arising, etc.	Active	HRDM	HRDM
16	Amounts charged per dwelling insufficient to deliver all projects in Strategy	Financial	Low	High	Within project	Reduce	Ongoing review of Strategy cost estimates and number of dwellings contributing mitigation payments. Investigate potential in-perpetuity agreement tender process.	Active	HRDM	HRDM
17	Quantum of SANGS required increases significantly	Strategic	Low	High	Within project	Avoid	We have an agreed Partnership SANGS Strategy. Continue work on delivery of identified and prioritised sites. Monitor effectiveness of delivered sites. Increase emphasis on developer provision of SANGS, reduce LPA burden, continue investigation of Land Trust-type model.	Active	HRDM	HRDM / GI Officer
18	Landowner decides not to sell land for SANGS Opportunity (SWE)	Strategic	Low	High	Within stage	Avoid	Maintain communication with landowners/developers. Expedite agreement of terms and sign contracts.	Active	TDC	TDC
19	Partnership unable to identify appropriate model for ongoing management of Strategy in perpetuity.	Strategic	Low	High	Within stage	Reduce	Funding identified and heads of terms for in-perpetuity management of Dawlish and SWE SANGS agreed between TDC and Land Trust. Completion currently dependent on final HIF arrangements, awaiting notification from DCC.	Active	Partner LPA / HRDM	TDC/ECC/EDDC

ID	Description	Category	Probability	Impact	Proximity	Response Category	Response	Risk Status	Risk Owner	Risk Actionee
20	Accident/injury at work (Habitat Mitigation Officers & Project Officer (Dogs))	People	Low	Medium	Within project	Avoid	Mandatory job related training (First Aid at Work, Sea Survival, Boat Handling etc), insurance. Post holders to read, understand and abide by EDDC H&S policy requirements. Lone working policy change agreed in consultation with EDDC Health & Safety Officer. Body Worn Camera policy and procedures to be followed as instructed.	Active	HRDM	HRDM
21	Dog bins vandalised on PBH	Operational	Low	Low	Within project	Fallback	Identify/allow for replacement as per PBH VMP.	Active	HRDM	Stakeholders / HRDM
22	Inappropriate behaviour at work.	People	Low	Medium	Within project	Avoid	Clear direction on desired approach from stakeholders. Regular 1:2:1 meetings with line managers. Post holders to read, understand and abide by EDDC Behaviours Framework policy requirements.	Active	HRDM	HRDM
23	Poor staff performance	People	Low	Low	Within stage	Reduce	Regular 1:2:1 meetings with line managers. Clear direction on desired approach from stakeholders. Clear job description and person specifications. Sufficient work and variation in work to motivate staff. Recognition of success and learning from failure.	Active	HRDM	HRDM
24	Change in (voting) Committee Member/s	Governance	Medium	Low	Within project	Accept	Ensure broad understanding of Strategy across the authorities - Members newsletters, media releases etc. Ensure new Member/s receive full briefing and access to previous reports.	Active	HRDM	HRDM

### Risks - Inactive status

1	Failure to reach agreement on funding SANGS	Strategic	Medium	High	Imminent	Avoid	Cross authority officer workshop. Agree criteria. Clarify SANGS Strategy approach/requirements. Identify accurate costs (purchase, uplift, manage), delivery models, quality, timeframes, outcomes for each area.	Inactive	HRDM	Group
2	Poor turnout of user groups for codes consultation	Operational	Medium	Medium	Within stage	Reduce	Good promotion of consultation via EEMP contacts and social media. Work with user groups to ensure ownership and involvement, respond to requests from users.	Inactive	HRDM	HRDM
3	Inability to source a Patrol Boat within budget	Financial	Medium	Medium	Within stage	Fallback	Make use of experienced staff to source Pboat of sufficient quality/attributes. Delay purchase until after peak season. Test boat before purchase. Explore part funding opportunities.	Inactive	HRDM	HRDM
page 69 4	Change in line management for Habitat Mitigation Officers & Project Officer (Dogs)	Operational	Low	Low	Within project	Fallback	Handover meeting with EDDC Countryside & HRDM. Monthly one to one meetings with HMOs & PO (DLD) to review and agree objectives. HRDM to undergo relevant training.	Inactive	HRDM	HRDM
5	Inability of Partnership to acquire sufficient land at acceptable cost to qualify as SANGS.	Strategic	Low	Medium	Within project	Reduce	SANGS procured @ Dawlish, procurement at SWE underway. Costs understood and partnership work with Land Trust enables in-perpetuity management. Change of approach to developer provided SANGS as a pre-requisite for larger developments. This is potentially of more concern for GESP.	Inactive	HRDM	TDC/ECC/EDDC
6	Insufficient funding to employ Delivery Manager / DLD after initial term	Financial	Medium	Medium	Within project	Reduce	Presuming a sound and robust rationale for maintaining roles, make business case to partner authorities and identify potential funding solution(s). Increased frequency of housing forecasts to signal any changes to income. Reprioritise projects to ensure continuity accordingly.	Inactive	HRDM	HRDM





SOUTH EAST DEVON  
HABITAT REGULATIONS  
PARTNERSHIP

## Habitat Regulations Executive Committee

### Risk Register Report: Appendix B – Scoring Matrix

Risk categorisation		
SEVERE		13 to 16
MAJOR		9 to 12
MODERATE		5 to 8
MINOR		1 to 4

PROBABILITY >	POSSIBLE	IMPACT >	Probable	Delays to mitigation measures identified in annual business plans <b>9 MAJOR</b>		Covid-19 <b>14 SEVERE</b>
			Possible	Dawlish Warren coastal realignment <b>7 MODERATE</b>		
				Housing market crash <b>7 MODERATE</b>		
				Developer contributions not paid <b>6 MODERATE</b>		
				Expiration of planning obligations / repayment of contribution to developers <b>6 MODERATE</b>	Proposed SANGS at Cranbrook do not meet essential criteria. <b>9 MAJOR</b>	
				Insufficient funding to contribute to Dawlish Warren Visitor Centre <b>6 MODERATE</b>	Habitat Regulations amended following exit from EU <b>9 MAJOR</b>	
				Loss of experienced staff <b>7 MODERATE</b>	HREC decisions not implemented at local level. <b>9 MAJOR</b>	
				Users refuse to respect Wildlife Refuges <b>6 MODERATE</b>		
				Patrol Boat/4x4 accident/vandalised <b>5 MODERATE</b>		
				Partnership unable to identify appropriate model for ongoing management of Strategy in perpetuity. <b>5 MODERATE</b>		
Rare	POSSIBLE	IMPACT >			Mitigation strategy measures insufficient to prevent significant effects to protected sites. <b>7 MODERATE</b>	
				Poor work performance <b>4 MINOR</b>		
				Change in (voting) Committee Member <b>4 MINOR</b>	One of the partner authorities withdraws from approach <b>7 MODERATE</b>	
				Accident/Injury at work <b>4 MINOR</b>	Amounts charged per dwelling insufficient to deliver all projects in Strategy <b>7 MODERATE</b>	
				Patrol Boat/4x4 accident/vandalised <b>4 MINOR</b>	Quantum of SANGS required increases significantly <b>7 MODERATE</b>	
				Inappropriate staff behaviour at work <b>2 MINOR</b>	Landowner decides not to sell land for SANGS Opportunity (SWE) <b>7 MODERATE</b>	
			Low	Medium	High	Very High
			<b>IMPACT &gt;</b>			



SOUTH EAST DEVON  
HABITAT REGULATIONS  
PARTNERSHIP

# South East Devon Habitat Regulations Executive Committee

*2020-21 Annual Business Plan and 5Yr Delivery Plan*

*Naomi Harnett,  
Principal Projects Manager,*

*Neil Harris,  
Habitat Regulations Delivery Manager,*

*Growth, Development & Prosperity,  
East Devon District Council  
July 2020*

**Legal comment/advice:**

There is no direct legal comment to be made at this time, each and any individual issue will need to be considered as it arises.

**Finance comment/advice:**

The financial implications are set out in the report.

<b>Public Document:</b>	Yes
<b>Exemption:</b>	None
<b>Review date for release</b>	None

## Recommendations

It is proposed that the Executive Committee:

1. Approves the 2020-21 Annual Business Plan (Appendix A) and the commitments and actions set out therein.
2. Notes the updated 5 Year Delivery Plan also shown in Appendix A.
3. Notes potential disruption to delivery of the ABP and 5 Year Delivery Plan as a result of the Covid-19 pandemic.
4. Receives a report by July 2021 relating to any proposed changes to the mitigation strategy regarding Dawlish Warren and the Exe estuary in relation to the Dawlish Warren Beach Management Scheme.

Equalities impact: Low

Risk: High.

If the 2020-21 Annual Business Plan is not approved there is a high risk that the delivery of the South East Devon European Site Mitigation Strategy would be significantly compromised or delayed. This would put the delivery of the partner Authorities' Local Plans at risk due to their continued legal duties under the Habitat Regulations.

### 1. Summary

1.1 This paper sets out the principles for the projects which have been recommended as a priority for delivery over the next 12 months by the Habitat Regulations Delivery Manager. These recommendations have been reviewed and agreed by the respective organisations which constitute the Officer Working Group. These projects are contained within the attached Appendix A as the Annual Business Plan (ABP).

1.2 The impacts of the Covid-19 pandemic to the delivery of the mitigation strategy continue to be felt and are difficult to fully quantify at this point in time. There continue to be significant impacts to our normal site operations and it is clear that significant financial implications are to be expected due to the lockdown in March-May 2020. Added to changing ways of working across the board and the potential for consultants and contractors to have reduced operational capacity, it is anticipated that there will be delays to delivery as a result. Therefore the ABP and 5 year plan is considered as the most appropriate course of action with the best available information at this point in time.

1.3 Timely and regular monitoring of projects, close liaison with partners and accurate reporting of any changes in housing delivery (with associated changes to income forecasting) will ensure that any delays to delivery of the Strategy are minimised, well understood and accounted for.

1.4 The ABP has been incorporated into an updated 5 year delivery plan, also contained within the attached Appendix A. This therefore sets out an indicative programme and budget forecast for the short and medium term. Due to anticipated changes in housing delivery forecasts as a result of Covid-19, it is recommended that current income projections (see Financial Report) are updated and reported to the next meeting of the Committee. As this is likely to change the budget predicted in the 5 year delivery plan it is also recommended that the plan is also reviewed at the next meeting.

1.5 As with previous business plans, it is important to note that a number of measures included in the 5 year plan are dependent on the success (or otherwise) of established measures, such as the Exe Estuary wildlife refuges. Therefore, projects earmarked for 2021-25 of the 5 year plan should be read in this context, as an indicative guide, rather than a prescription.

1.6 Using the balance of receipts and income forecast from issued planning permissions, measures from the mitigation Strategy ("the Strategy") are allocated according to the available budget, logical progression of related projects and, where still appropriate, delivery timescales as recommended in the Strategy.

1.7 It should be noted that the last line of each year's spreadsheet (termed "Balance less expenditure") in Appendix A refers to the potential carry-forward of income once the projected income (3<sup>rd</sup> line of each spreadsheet) has been received and after allowing for the recommended expenditure. This potential carry-forward is in effect an ongoing fund which sets aside revenue income over a period of time to fund the ongoing mitigation projects over their intended 80 year lifespan. This is to ensure mitigation in-perpetuity as per the Strategy.

1.8 Measures recommended in the 2020/21 ABP seek to maintain and build on the projects delivered in the preceding plans, such as the Pebblebed Heaths visitor access advisory report. The timing of delivery of these projects is guided by the updated 5 year Delivery Plan and where there is logic or merit in the sequential, co-ordinated delivery of mitigation projects, seeks to build on work already completed (or due for completion).

## **2. Dawlish Warren Beach Management Scheme**

2.1 The Beach Management Scheme (BMS) at Dawlish Warren was a £12million project completed by the Environment Agency (EA) and TDC in October 2017. This work was primarily aimed at reducing the risk of flooding to properties around the River Exe.

2.2 Work ranged from installing new ‘geotube’ sandbag defences under the dunes at the narrowest point of the Warren, removing stone basket “gabions”, replacing and modifying timber wall “groynes” (used to capture and/or slow the movement of sand) and near-shore dredging operations to recharge the beach. Over 250,000 cubic metres of sand was pumped onto the beach.

2.3 Since the physical works were completed the site has experienced increased levels of erosion from the sea, rather than recreation, to sections of the beach and dunes than had been anticipated. Although a degree of change, with the beach lowering and the dunes rolling back was to be expected at some future point, this has happened more quickly than had been modelled. In addition, there are unconfirmed reports regarding sand (allegedly as a result of the scheme) deposition in the Exe estuary and concerns relating to potential environmental impacts.

2.4 Therefore, it is recommended that there is a brief pause in any new significant spend on projects at Dawlish Warren which could potentially be affected by storm action or erosion in the short to medium term. This is intended to ensure that investments are as effective as possible, both in terms of cost and mitigation impact.

2.5 There are no similar mitigation measures identified for the Exe which would be affected in the same way as those at Dawlish Warren. However, there is a clear need to understand what (if any) evidence there is of potential impacts to protected species and habitats in the estuary as a result of the BMS. It is acknowledged that this is a wider issue than the recreational disturbance which concerns the Executive Committee, but there remains a degree of overlap between the two.

2.6 The Delivery Manager is working with the EA and TDC to arrange a meeting with stakeholders to understand what further changes might be anticipated, over what timescale, what management is proposed for the site and how this might affect the mitigation strategy. However, it is currently unclear how much certainty there can be from future modelling of changes, bearing in mind that the current models are seemingly inaccurate. It is recommended that the outcome of these discussions is the focus of a report to Committee no later than the July 2021 meeting which outlines a plan for the future to deliver cost-effective mitigation and ensure that the authorities continue to meet their legal obligations. This deadline will be dependent on the changing situation regarding Covid-19.

### **3.0 Pebblebed Heaths visitor access improvements.**

3.1 Following the conclusion of the public consultation from Sept-Nov 2019 and Executive approval of the subsequent report, sufficient developer contributions have been collected with which to proceed with phased implementation of the proposals for the Pebblebed Heaths visitor access improvements.

3.2 The Delivery Manager has held meetings with colleagues in Planning, Estates and Engineering departments at EDDC in order to further investigate which works would require permission, the timescales involved and to benchmark the costings used in the advisory reports.

3.3 As listed below, a phased approach achieves a number of different objectives in terms of, preparation, implementation and communication:

- \_) Allows prioritisation of works which encourage visitors towards car parks where habitats are more robust and away from more dispersed access points.
- \_) Economies of scale can be achieved in terms of materials and labour.
- \_) Tenders become more attractive due to the amount of expenditure.
- \_) Proposed phasing of works would appeal to different sized contractors.
- \_) Budget can be allocated without risking funding needed to ensure ongoing delivery of other projects.
- \_) Phased improvements enable continued access to the heaths with as little disruption as possible.
- \_) Works can be organised so as to provide significant improvements prior to any scheduled restrictions of access in other areas of the heaths.
- \_) Planning applications can apply to whole phases rather than per proposal.
- \_) Communication to visitors and other arrangements about the works can be more easily co-ordinated.
- \_) A clear, phased communications plan can be implemented to inform the wider public about the works and act as a reminder for why they are needed.

3.4 Appendix B illustrates the proposed schedule of improvements and the estimated budget requirements per year. It can be seen that in 2020-21 (annual business plan period), improvements are recommended at Four Firs, Frying Pans, Stowford Woods and Joney's Cross.

3.5 Each phase includes a 15% consultancy fee in order to cover the costs of project management of all aspects of the works. This is considered a reasonable allowance based on previous engineering projects of a similar scale and complexity. This fee includes design development, planning support, appointment/overview of contractors to undertake the work, liaison with the Delivery Manager and Pebblebed Heaths site manager and a contingency reserve. Issues of capacity and staff resource prohibit both Clinton Devon Estates and EDDC from undertaking the project management work itself.

3.6 Appendices C, D, E and F are included in order to provide an overview of the current situation at each site and the intended end result. Appendix G provides an overview map of the whole of the East Devon Pebblebed Heaths SPA/SAC. As two of the most popular car parks on the heaths, the improvements at Four Firs and Joney's Cross are the more significant in the first phase of works, both in terms of investment and intended project outcomes.

3.7 Broadly speaking (and as detailed in the Jan 2020 report<sup>1</sup>), the proposals are focused on improving surfacing, layout, signage and entrance points to the heaths. They are aimed at making areas safer to access, easier to park and easier to find, whilst at the same time enabling greater communication of key messages and therefore promoting positive behavioural change.

---

<sup>1</sup> *East Devon Pebblebed Heaths visitor access consultation, January 2020.*

---

3.8 The closure of the (less frequented) Frying Pans car park to everyday use will enable protection of the site from fly-tipping, abandoned cars and antisocial behaviour but still keep it open for occasional events. By formalising the roadside parking at the entrance, some access to this area of the heaths will still be possible, although future improvements at nearby Wheathills car park will also encourage use of that car park as well.

3.9 In tandem with the physical works in Phase 1 is a recommendation to approve design and development of new interpretation boards and signage to inform visitors about the special nature of the area, help them to find their way around and promote less sensitive routes around the heaths. It is proposed that the design work for this is undertaken as part of Phase 1, with manufacture and installation of the signs to align with subsequent phases as appropriate.

3.10 Initial funding of £5000 for design work on interpretation boards was approved by the Committee as part of the 2019-20 annual business plan. To proceed with full delivery of this measure it is now recommended that the remaining £10K of the interpretation board budget (as identified in the Pebblebed Heaths Visitor Management Plan) is also approved.

Proposed spend in 2020-21: £184,129, comprised of:

Signage relating to behaviour and promoted routes – up to £13,000

Interpretation – up to £10,000

Works to car parks – Phase 1 - up to £161,129

#### **4.0 Positive behavioural change.**

4.1 As detailed and prepared in another report from Jan 2020<sup>2</sup>, the Executive Committee have approved a schedule of work aimed at developing our approach to positive behavioural change. This included an expanded outreach programme with local clubs, groups and schoolchildren as well as review and redesign of our online content, which is underway.

4.2 There are three items of recommended expenditure relating to behavioural change which can be funded through savings of £24K realised on an existing measure relating to behavioural change. Work to design and install signage at slipways and access points to the estuary was allocated a capital budget of £40K but has been completed at a cost of £16K due to efficiencies in design and procurement.

##### *Item 1*

4.3 It is recommended that £3500 is earmarked for a branded gazebo and associated display equipment and literature to enable the Habitat Mitigation Officers to greatly increase their impact and presence onsite at places such as the Imperial Recreation Ground in Exmouth and across the Pebblebed Heaths. In time, the gazebo will also be able to be used at events such as the Devon County Show and Farmwise Devon Schools day to illustrate the work of the partnership and promote key messages. This will eventually complement the work the officers

---

<sup>2</sup> Effecting positive behavioural change, January 2020.

have been developing, such as holding “wildlife watch” spots where members of the public can use a telescope to see the birds of the Exe up close and in detail.

#### *Item 2*

4.4 The Exmouth Imperial Recreation Ground is a key access point to the Exe estuary and as such is also an important location for messaging relating to behavioural change. A limited amount of signage concerning the wildlife refuges and ecological importance of the estuary was installed in August 2018 but this has since become out of date due to the ongoing tidal defence scheme. Given the importance of this area, it is further recommended that up to £2500 should be invested in new signage for the area when the defence works are completed.

#### *Item 3*

4.5 Initially developed 3 years ago with very minimal budget to host the Exe estuary wildlife refuge consultation, the [www.southeastdevonwildlife.org.uk](http://www.southeastdevonwildlife.org.uk) website is in need of a redesign. It is of particular relevance now as more and more people engage with information online rather than face to face onsite. A side effect of the Covid-19 lockdown has been for an increase of new visitors discovering the protected sites for the first time, many of whom are not aware of the rarity or vulnerability of the wildlife and habitat. At a time where our on site engagement opportunities are limited by necessity, our online engagement should be improved to try to cover any lost audiences. Its core purposes will be to provide key information, educate and inspire our visitors about some of the most ecologically valuable and biodiverse areas in Europe. It is estimated that this work could be achieved for an estimated £5000.

4.6 With expenditure of approximately £11000 on additional measures, this maintains a saving of £13K from the original signage work estimate.

Proposed spend: £11,000

- Gazebo, display equipment and literature - £3500
- Revised signage for the Imperial Recreation Ground – £2500
- Redesign of website [www.southeastdevonwildlife.org.uk](http://www.southeastdevonwildlife.org.uk) - £5000

### **5. HMO vehicle change.**

5.1 As approved in the 2016 (first) annual business plan, the Habitat Mitigation Officers have an Isuzu D-Max vehicle to enable their patrols across the region. In changing the strategy approach from lease to outright purchase (with capital replacement every 10 years) it was estimated that this saved approximately £380,000 over the duration of the strategy.

5.2 The specification of the vehicle was based on a number of presumptions from the Strategy which outlined the possibility that the (as then not procured) patrol boat would need to be towed to and from a storage area on a trailer and that the HMOs may be required to travel off-road around the Pebblebed Heaths

5.3 Since that time and due to subsequent arrangements relating to the patrol boat and work on the heaths, it has become evident that the vehicle is not needed for the more demanding purposes originally intended. As such it is considered beneficial in terms of cost saving and reduction in carbon emissions for the HMO vehicle to be changed for a more appropriate model, such as a Citroen Berlingo.

5.4 An initial investment of up to £3,000 is recommended, to account for the difference in price between the resale value of the Izusu against the cost of a new Citroen Berlingo. However, market testing indicates that this investment would be recouped over a 10 year period due to cheaper running and servicing costs of the smaller vehicle. Additionally, this also realises significant carbon emissions savings of 83 g/km, or approximately 1000kg/year based on annual mileage of 7500.

## **7.0 Conclusion**

7.1 This paper seeks approval for the 2020/21 Annual Delivery Plan in the context of an updated 5 year Delivery Plan. The Covid-19 pandemic poses unprecedented challenges to successful delivery of the Strategy and it is anticipated that there will be some delay whilst we adjust our ways of working to the “new normal”. Early indications are that both Dawlish Warren and the Pebblebed Heaths are experiencing significant changes in recreational pressure as a result of the pandemic. If such changes persist then the Strategy will need to adapt to account for them. Timely and regular reporting of the status of projects in the 2021/21 ABP will provide reassurance to the Committee and our partners that everything that can be done is being done.

7.2 Further work is required in order to fully understand the current (and likely future) situation at Dawlish Warren and the Exe estuary. Any potential implications for the protected sites as they relate to the mitigation Strategy will be the subject of a future report to the Executive, following discussion between relevant organisations including the EA, Natural England, TDC, Devon Wildlife Trust and the Exe Estuary Management Partnership.

7.3 The recommendations also build on previous reports relating to behavioural change initiatives and survey work on the East Devon Pebblebed Heaths.

**Naomi Harnett  
Principal Projects Manager,**

**Neil Harris,  
Habitat Regulations Delivery Manager,**

**Growth, Development and Prosperity  
East Devon District Council, July 2020**

Natural England comment:

It is likely that there will be changes in the pressures on the protected sites a result of the pandemic during 2020-21, therefore the ABP and 5 year Delivery Plan measures will need to be flexible to adapt as the implications become clearer.

It is important that the visitor counts and surveys currently underway are completed as soon as feasible to help us understand what changes in visitor numbers and behaviour are occurring on the protected sites.

<b>ABP 2020/21</b>	<b>Dawlish Warren</b>	<b>Exe Estuary</b>	<b>Pebblebed Heaths</b>	<b>Infrastructure funded from CIL</b>	<b>Totals</b>
Carry-forward (including potential)	618,323.46	210,421.52	249,879.75	336,187.35	<b>1,414,812.08</b>
<b>2020-21</b>					-
Projected income	26,048.00	165,158.00	219,452.00	126,258.00	<b>536,916.00</b>
<b>Total potential budget</b>	<b>644,371.46</b>	<b>375,579.52</b>	<b>469,331.75</b>	<b>462,445.35</b>	<b>1,951,728.08</b>
					-
Dog project	666.67	666.67	666.67		2,000.00
Delivery manager	15,293.20	15,293.20	15,293.20		45,879.60
Dog project officer	7,184.20	7,184.20	7,184.20		21,552.60
Dog project vehicle	625.00	625.00	625.00		1,875.00
Two Habitat Mitigation Officers	23,120.00	23,120.00	23,120.00		69,360.00
Warden Vehicle	666.67	666.67	666.67		2,000.00
Monitoring support	2,278.00	2,278.00	2,278.00		6,834.00
Accountancy support	5,395.80	5,290.00	5,290.00		15,975.80
Boat		7,000.00			7,000.00
<b>B projects</b>					-
<b>Exe</b>					-
Update slipway signs		25,000.00			25,000.00
HMO Gazebo, display tables, literature		3,000.00			3,000.00
Maintainance buoy markers		13,000.00			13,000.00
<b>Dawlish Warren</b>					-
BBQ info at local retailers	2,000.00				2,000.00
(All) Visitor numbers	2,333.33	2,333.33	2,333.33		7,000.00
(All) Visitor behaviour	1,666.67	1,666.67	1,666.67		5,000.00
DW & Exe Wildlife Refuges maint.	720.00	720.00			1,440.00
DW Vegetation monitoring	5,000.00				5,000.00
<b>Pebblebed Heaths</b>					-
Signs directing people				6,500.00	6,500.00
Signs related to conduct			6,600.00		6,600.00
<b>5-year plan items</b>					-
DW & Exe Wildlife Refuges	5,000.00	5,000.00			10,000.00
PBH Monitoring of breeding birds and Southern damselfly			3,000.00		3,000.00
BBQ info at local retailers	50.00				50.00

Regular Warren Newsletter	500.00	500.00			1,000.00
PBH Dog bins				3,370.00	3,370.00
PBH Education work with schools			4,656.00		4,656.00
PBH Interpretation Boards				15,000.00	15,000.00
PBH Boardwalks/Path surfacing				10,000.00	10,000.00
PBH Works to car parks				161,129.00	161,129.00
Total expenditure	72,499.53	113,343.73	73,379.73	195,999.00	455,222.00
<b>Balance less expenditure</b>	<b>571,871.93</b>	<b>262,235.78</b>	<b>395,952.01</b>	<b>266,446.35</b>	<b>1,496,506.08</b>

<b>5 Yr plan 2021/22</b>	<b>Dawlish Warren</b>	<b>Exe Estuary</b>	<b>Pebblebed Heaths</b>	<b>Infrastructure funded from CIL</b>	<b>Totals</b>
Carry-forward (including potential)	571,871.93	262,235.78	395,952.01	266,446.35	<b>1,496,506.08</b>
<b>2021-22</b>					-
Projected income	76,736.00	154,533.00	181,093.00	108,897.00	<b>521,259.00</b>
<b>Total potential budget</b>	<b>648,607.93</b>	<b>416,768.78</b>	<b>577,045.01</b>	<b>375,343.35</b>	<b>2,017,765.08</b>
Dog project	666.67	666.67	666.67		2,000.00
Delivery manager	15,599.06	15,599.06	15,599.06		46,797.19
Dog project officer	7,327.88	7,327.88	7,327.88		21,983.65
Dog project vehicle	625.00	625.00	625.00		1,875.00
Two Habitat Mitigation Officers	15,599.06	23,582.40	23,582.40		62,763.86
Warden Vehicle	666.67	666.67	666.67		2,000.00
Monitoring support	2,323.56	2,278.00	2,278.00		6,879.56
Accountancy support	5,503.72	5,503.72	5,503.72		16,511.15
Boat		7,000.00			7,000.00
<b>5-year plan items</b>					-
Ex WeBS	500.00	500.00			1,000.00
BBQ info at local retailers	50.00				50.00
Regular Warren Newsletter	500.00	500.00			1,000.00
Update signs at public slipways		1,000.00			1,000.00
Dog bins				3,370.00	3,370.00
Education work with schools			4,656.00		4,656.00
Works to car parks				158,014.00	158,014.00
Total expenditure	49,361.62	65,249.40	60,905.40	161,384.00	<b>336,900.42</b>
<b>Balance less expenditure</b>	<b>599,246.31</b>	<b>351,519.38</b>	<b>516,139.62</b>	<b>213,959.35</b>	<b>1,680,864.66</b>

<b>5 Yr plan 2022/23</b>	<b>Dawlish Warren</b>	<b>Exe Estuary</b>	<b>Pebblebed Heaths</b>	<b>Infrastructure funded from CIL</b>	<b>Totals</b>
Carry-forward (including potential)	599,246.31	351,519.38	516,139.62	213,959.35	<b>1,680,864.66</b>
<b>2022-23</b>					-
Projected income	77,440.00	216,038.00	164,790.00	106,827.00	<b>565,095.00</b>
<b>Total potential budget</b>	<b>676,686.31</b>	<b>567,557.38</b>	<b>680,929.62</b>	<b>320,786.35</b>	<b>2,245,959.66</b>
Dog project	666.67	666.67	666.67		2,000.00
Delivery manager	15,911.05	15,911.05	15,911.05		47,733.14
Dog project officer	7,474.44	7,474.44	7,474.44		22,423.33
Dog project vehicle	625.00	625.00	625.00		1,875.00
Two Habitat Mitigation Officers	24,054.05	24,054.05	24,054.05		72,162.14
Warden Vehicle	666.67	666.67	666.67		2,000.00
Monitoring support	2,370.03	2,370.03	2,370.03		7,110.09
Accountancy support	5,613.79	5,613.79	5,613.79		16,841.37
Boat		7,000.00			7,000.00
<b>5-year plan items</b>					-
DW Vegetation monitoring	5,000.00				5,000.00
DW Petalwort monitoring	1,000.00				1,000.00
PBH Erosion & Path Width			1,500.00		1,500.00
BBQ info at local retailers	50.00				50.00
Regular Warren Newsletter	500.00	500.00			1,000.00
Close railway crossing at Cockwood		2,000.00			2,000.00
Gate slipway at Exmouth Imp Rec.		1,000.00			1,000.00
Updates of the Exe Estuary leaflets		6,000.00			6,000.00
New interpretation boards (five boards)		1,250.00			1,250.00
Review and revision of byelaws		10,000.00			10,000.00
Update signs at public slipways		1,000.00			1,000.00
Dog control order -mudflats		7,500.00			7,500.00
Dog bins			3,370.00		3,370.00
Education work with schools			4,656.00		4,656.00
Works to car parks				176,000.00	176,000.00
Total expenditure	63,931.69	93,631.69	66,907.69	176,000.00	<b>400,471.07</b>
<b>Balance less expenditure</b>	<b>612,754.62</b>	<b>473,925.70</b>	<b>614,021.93</b>	<b>144,786.35</b>	<b>1,845,488.59</b>

<b>5 Yr plan 2023/24</b>	<b>Dawlish Warren</b>	<b>Exe Estuary</b>	<b>Pebblebed Heaths</b>	<b>Infrastructure funded from CIL</b>	<b>Totals</b>
Carry-forward (including potential)	612,754.62	473,925.70	614,021.93	144,786.35	<b>1,845,488.59</b>
<b>2023-24</b>					-
Projected income	133,760.00	215,346.00	177,152.00	120,804.00	<b>647,062.00</b>
<b>Total potential budget</b>	<b>746,514.62</b>	<b>689,271.70</b>	<b>791,173.93</b>	<b>265,590.35</b>	<b>2,492,550.59</b>
					-
Dog project	666.67	666.67	666.67		2,000.00
Delivery manager	16,229.27	16,229.27	16,229.27		48,687.80
Dog project officer	7,623.93	7,623.93	7,623.93		22,871.79
Dog project vehicle	625.00	625.00	625.00		1,875.00
Two Habitat Mitigation Officers	24,535.13	24,535.13	24,535.13		73,605.39
Warden Vehicle	666.67	666.67	666.67		2,000.00
Monitoring support	2,417.43	2,417.43	2,417.43		7,252.30
Accountancy support	5,726.07	5,726.07	5,726.07		17,178.20
Boat		7,000.00			7,000.00
<b>5 year plan items</b>					-
DW Erosion monitoring	1,000.00				1,000.00
BBQ info at local retailers	50.00				50.00
Regular Warren Newsletter	500.00	500.00			1,000.00
Updates of the Exe Estuary leaflets		6,000.00			6,000.00
New interpretation boards		1,250.00			1,250.00
Update signs at public slipways		1,000.00			1,000.00
Dog bins				3,370.00	3,370.00
Education work with schools			4,656.00		4,656.00
Interpretation Boards				2,000.00	2,000.00
Boardwalks/Path surfacing				5,000.00	5,000.00
<b>Total expenditure</b>	<b>60,040.16</b>	<b>74,240.16</b>	<b>63,146.16</b>	<b>10,370.00</b>	<b>207,796.47</b>
<b>Balance less expenditure</b>	<b>686,474.46</b>	<b>615,031.54</b>	<b>728,027.77</b>	<b>255,220.35</b>	<b>2,284,754.12</b>

<b>5 Yr plan 2024/25</b>	<b>Dawlish Warren</b>	<b>Exe Estuary</b>	<b>Pebblebed Heaths</b>	<b>Infrastructure funded from CIL</b>	<b>Totals</b>
Carry-forward (including potential)	686,474.46	615,031.54	728,027.77	255,220.35	<b>2,284,754.12</b>
<b>2024-25</b>					-
Projected income	151,360.00	218,932.00	197,030.00	-	<b>567,322.00</b>
<b>Total potential budget</b>	<b>837,834.46</b>	<b>833,963.54</b>	<b>925,057.77</b>	<b>255,220.35</b>	<b>2,852,076.12</b>
					-
Dog project	666.67	666.67	666.67		<b>2,000.00</b>
Delivery manager	16,229.27	16,229.27	16,229.27		<b>48,687.80</b>
Dog project officer	7,623.93	7,623.93	7,623.93		<b>22,871.79</b>
Dog project vehicle	625.00	625.00	625.00		<b>1,875.00</b>
Two Habitat Mitigation Officers	24,535.13	24,535.13	24,535.13		<b>73,605.39</b>
Warden Vehicle	666.67	666.67	666.67		<b>2,000.00</b>
Monitoring support	2,417.43	2,417.43	2,417.43		<b>7,252.30</b>
Accountancy support	5,726.07	5,726.07	5,726.07		<b>17,178.20</b>
Boat		7,000.00			<b>7,000.00</b>
<b>5 year plan items</b>					-
DW Erosion monitoring (DW)	1,000.00				<b>1,000.00</b>
BBQ info at local retailers (DW)	50.00				<b>50.00</b>
Regular Warren Newsletter (DW)	500.00	500.00			<b>1,000.00</b>
New interpretation boards (EXE)		1,250.00			<b>1,250.00</b>
Update signs at public slipways (EXE)		1,000.00			<b>1,000.00</b>
Dog bins (PBH)				3,370.00	<b>3,370.00</b>
Education work with schools (PBH)			4,656.00		<b>4,656.00</b>
Interpretation Boards (PBH)				2,000.00	<b>2,000.00</b>
Boardwalks/Path surfacing (PBH)				5,000.00	<b>5,000.00</b>
Total expenditure	60,040.16	68,240.16	63,146.16	10,370.00	<b>201,796.47</b>
Carry-forward	777,794.31	765,723.38	861,911.61	244,850.35	<b>2,650,279.65</b>
<b>Balance less expenditure</b>	<b>777,794.31</b>	<b>765,723.38</b>	<b>861,911.61</b>	<b>244,850.35</b>	<b>2,650,279.65</b>

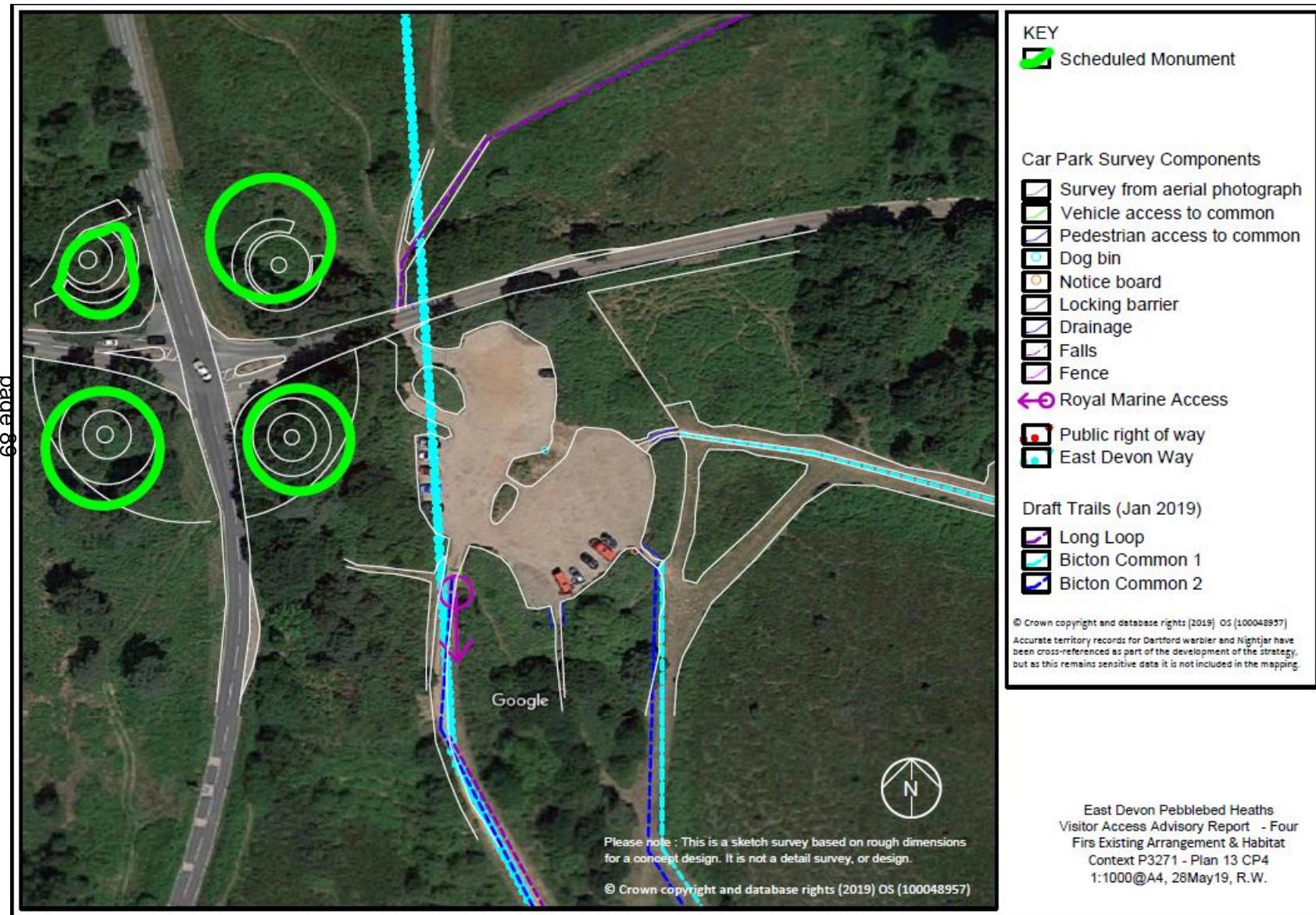
Project	Capital
<b>2020-21</b>	
Four firs works	£ 77,180
Frying Pans works	£ 9,425
Stowford works	£ 7,873
Joneys Works	£ 46,651
Consultancy fees @ 15%	£ 21,169
<b>Total</b>	<b>£ 162,298</b>

2021-22	
Model air works	£ 67,534
Uphams works	£ 24,447
Warren works	£ 46,033
Consultancy fees @ 15%	£ 20,702.10
<b>Total</b>	<b>£ 158,716</b>

2022-23		Entrance	View	Trail
Estuary (entrance, view & trail)	£ 76,541	£ 42,702	£ 13,839	£ 20,000
Castle works	£ 18,519			
Wheathill works	£ 41,528			
Squabmoor works	£ 19,412			
Consultancy fees @ 15%	£ 23,400			
<b>Total</b>	<b>£ 179,400</b>			
<b>Overall</b>	<b>£ 500,414</b>			

# Habitat Regulations Executive Committee

2020-21 Annual Business Plan and 5Yr Delivery Plan: Appendix C. Four Firs car park – current scenario:

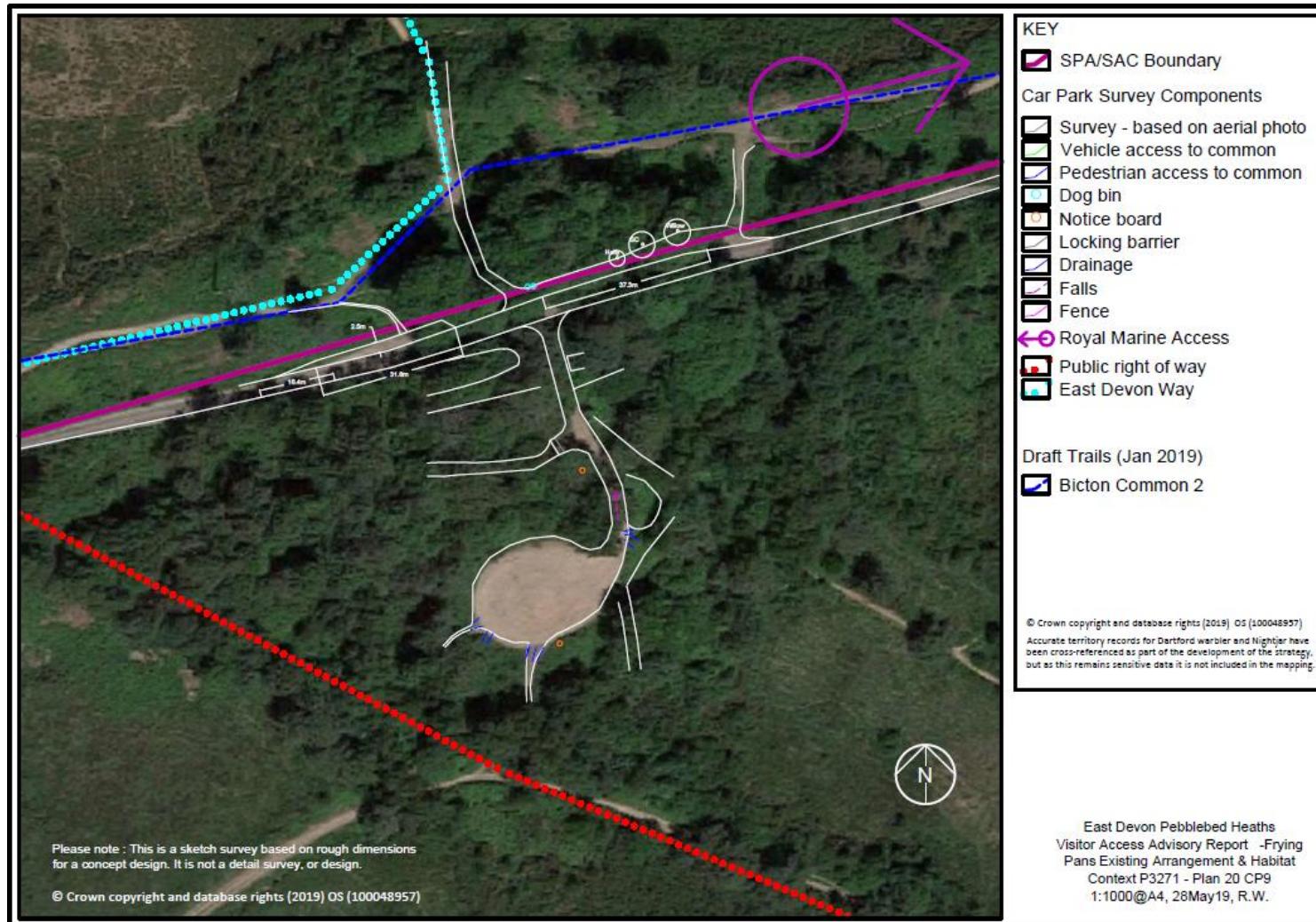


Four firs recommendation.



## Habitat Regulations Executive Committee

2020-21 Annual Business Plan and 5Yr Delivery Plan: Appendix D Frying Pans car park – current scenario:



## Frying Pans – recommendation



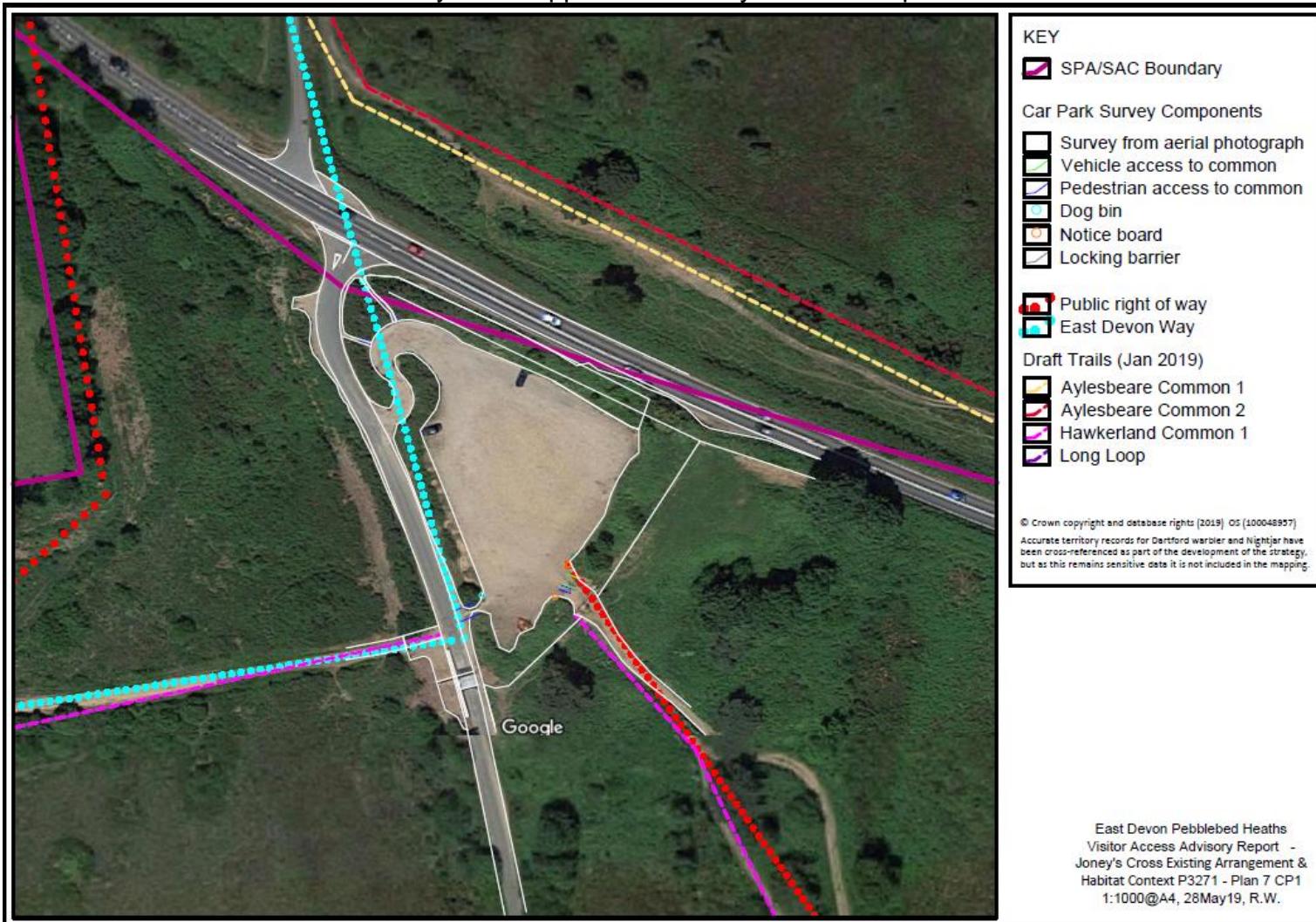
## Habitat Regulations Executive Committee

2020-21 Annual Business Plan and 5Yr Delivery Plan: Appendix E Stowford car park – recommendation:



## Habitat Regulations Executive Committee

2020-21 Annual Business Plan and 5Yr Delivery Plan: Appendix F Joney's cross car park – current scenario:



## Joneys cross - recommendation





SOUTH EAST DEVON  
HABITAT REGULATIONS  
PARTNERSHIP

# South East Devon Habitat Regulations Executive Committee

## *Refreshments at Dawlish Countryside Park*

Fergus Pate, Principal Delivery Officer, Teignbridge District Council  
July 2020.

**Legal comment/advice:**

There is no direct legal comment to be made at this time, each and any individual issue will need to be considered as it arises.

**Finance comment/advice:**

The financial implications are set out within the report, the modest net income will help support the Habitat Regulations Executive Committee budgets.

<b>Public Document:</b>	Yes
<b>Exemption:</b>	None
<b>Review date for release</b>	None

## Recommendations

It is proposed that the Executive Committee:

1. Delegate authority for Teignbridge District Council to procure a lease for refreshments to be provided at Dawlish Countryside Park in accordance with the parameters set out at Section 3.
2. Recover proceeds from the lease as a contribution towards the Executive Committee's budget. The amount recovered should exclude the reasonable administrative expenses of Teignbridge District Council.
3. Receive a future report on whether to extend the lease for refreshments beyond the first year of operation.

Equalities impact: Low

Risk: Low/Medium

Refreshment facilities could diminish the rural attractiveness of the park and reduce car parking space. A short term lease will allow these impacts to be kept under review.

## 1. Background

1.1 Dawlish Countryside Park was opened in 2017 as the first Suitable Alternative Natural Greenspace (SANGS) in Greater Exeter. The award winning park has been well received by local people and currently benefits from around 477 daily visits.

1.2 The South East Devon European Site Mitigation Strategy identified the need for SANGS in providing an alternative destination to the European Sites. The new countryside parks are expected to inhibit rural characteristics whilst also being attractive to visitors and easy to access.

1.3 Teignbridge Council currently operates Dawlish Countryside Park and has been approached by a number of visitors as well as prospective operators who would like to see a refreshments concession at the park. It is anticipated that this would most likely take the form of a trailer or converted vehicle (with no associated seating area) serving limited refreshments such as teas and coffees.

1.4 Ongoing management of the countryside park is ultimately the responsibility of the Habitat Regulations Executive Committee, hence approval to delegate authority for Teignbridge to procure refreshments at the park is sought.

1.5 If another management organisation takes on responsibility for the day to day running of the countryside park they could also assume responsibility for managing the refreshments lease. This matter should be agreed directly by Teignbridge.

## **2. The principle of SANGS refreshment facilities**

2.1 SANGS are focussed on providing a quiet countryside experience that is attractive to walkers, dog walkers and potentially families. It is recognised that these qualities may not sit comfortably with significant urbanising features such as new buildings and commercial attractions.

2.2 The SANGS guidance therefore limits the scope of refreshment facilities that can be provided but does not prevent something modest. Upton Countryside Park in Dorset is amongst examples of SANGS sites where there are refreshment facilities. Please see the following link:

<https://pooleprojects.net/upton/>

2.3 If refreshment facilities are to be provided at the park, they should be very modest and impacts carefully reviewed. It must be recognised that the purpose of the SANGS as habitat mitigation should not be allowed to be compromised by additional uses of the countryside park. The introduction of refreshments is not a precursor to other activities like firework events, running events, mountain biking or horse riding.

## **3. Scope of the facilities to be provided at Dawlish**

3.1 In order to preserve the character of Dawlish Countryside Park and ensure that any refreshment facility is incidental to a visit, the following parameter should be met:

- a) Modest refreshment facility with dimensions of approximately 5m x 2m x 2m
- b) Sited in an agreed position around the countryside park car park
- c) No outside seating or other ancillary features (other than waste and recycling facilities) to be provided
- d) The operator should disseminate South East Devon Habitat Regulations Partnership material and highlight the importance of the European Sites to customers.
- e) Initial lease of no more than one year.
- f) Teignbridge to review whether to enter into a subsequent lease in consultation with the Executive Committee.

## **4. Financial implications**

4.1 Teignbridge Council will be responsible for securing the refreshment facility lease. They can be expected to market the opportunity and generate a commercial rent.

4.2 Income should be passed from Teignbridge to the Habitat Regulations Executive Committee, less Teignbridge's costs associated with marketing, agreeing and managing the lease.

4.3 The amount of income generated is likely to be modest in the context of overall Habitat Regulations Executive Committee budgets but will assist with ongoing implementation of the South East Devon European Site Mitigation Strategy.

## **5. Monitoring and review**

5.1 An initial lease period of up to one year is proposed. Before any additional term is agreed the impacts of introducing refreshment facilities should be reviewed by the Habitat Regulations Delivery Manager.

5.2 Factors influencing the Delivery Manager's opinion are likely to include trends in the number of visitors to the countryside park, feedback from visitors to the park the European Sites and other nearby attractions. Baseline and subsequent regular counts of the number of cars parked at the SANGS will provide important information. In addition, advice from the Dawlish Countryside Park ranger and other staff that manage the park is also likely to represent an important consideration.

5.3 Having reviewed the evidence available, the Habitat Regulations Executive Committee would be asked to make a future decision on whether to extend any lease beyond year one.

## **6. Conclusion**

6.1 Delegating authority for Teignbridge Council to enter into a lease for refreshments to be provided at Dawlish Countryside Park would respond to requests from users of the park.

6.2 The lease would secure some funding for ongoing implementation of the South East Devon European Site Mitigation Strategy and its renewal would be subject to consultation with the Habitat Regulations Delivery Manager and a future decision of the Habitat Regulations Executive Committee.

**Fergus Pate,  
Principal Delivery Officer,  
Teignbridge Council**

**South East Devon  
Habitat Regulations  
Executive Committee**

**July 2020**

**Natural England comment:**

We concur with the report that “the purpose of the SANGS as habitat mitigation should not be allowed to be compromised by additional uses of the countryside park”. The effect of the proposal on the SANGs needs to be regularly monitored and if introduction of refreshment facilities is found to discourage dog walkers or other recreational visits then the lease should not be renewed.