



SOUTH EAST DEVON  
HABITAT REGULATIONS  
PARTNERSHIP

# South East Devon Habitat Regulations Executive Committee

*East Devon Pebblebed Heaths visitor access  
consultation*

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*January 2020.*



**Exeter**  
City Council



Legal comment/advice:

The report does not raise any specific legal implications requiring comment.

Finance comment/advice:

The financial implications of the consultation exercise will be better understood once the costs relating to the developments required are better understood and quantified. Finance should be involved in reviewing the timing, funding and development of the recommendations before a 5 year delivery programme is presented.

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

Equalities impact: Low

Risk: High. This report outlines the mitigation measures for the East Devon Pebblebed Heaths as identified in the Visitor Management Plan. Within the context of an increasing human population, it is critical that future visitor access to the heaths is planned and prepared in advance of impacts. Robust and effective mitigation enables the partner authorities to be certain of no net impact to this highly protected site. This enables the continued development as outlined in respective local plans and within 10km of the heaths without the risk of legal challenge.

## 1. Background

1.1 Covering over 1,400 hectares, the East Devon Pebblebed Heaths (EDPH) comprise the single biggest expanse of lowland heathland in Devon. The main core of the EDPH is notified as Site of Special Scientific Interest (SSSI). The site is also of international conservation value and is designated a Special Area of Conservation (SAC) and a Special Protection Area (SPA) under the EU Birds Directive and the EU Habitats Directive due to its support of rare habitats, Nightjars, Dartford warblers and the southern damselfly.

1.2 The East Devon Area of Outstanding Natural Beauty (AONB) was designated in 1963 and covers all of the EDPH. The AONB Management Strategy recognises the EDPH as a significant landscape feature in East Devon, containing important natural habitats and archaeological features.

1.3 In simple terms, this put the heaths in the top hierarchy of international conservation sites and affords them legal protection against the deterioration of their habitats and disturbance (and deterioration) of the species for which they have been designated.

1.4 The Pebblebed Heaths are registered commons and as such are Open Access Land under the Countryside and Rights of Way Act 2000. The heaths comprise several separate but adjacent common ownerships. Most of the designated area (ca. 80%) is owned by Clinton Devon Estates and managed by the East Devon Pebblebed Heaths Conservation Trust (EDPHCT) for the benefit of wildlife and to promote the public enjoyment and appreciation of the reserve. Some smaller areas are leased or owned by the RSPB, with remaining areas privately owned and managed, including by the Devon Wildlife Trust (DWT).

1.5 Visitor surveys conducted as part of the Pebblebed Heaths Visitor Management Plan (VMP) (2017) found that the majority (91%) of interviewees had travelled to the interview location by car or van. The report concluded that provision of parking is fundamental to how the site is used and how recreation is managed.

1.6 Many human activities on heathland will result in impacts, whether it is from localised trampling and nitrogen impacts from dog waste, or major impacts such as large fires. The range of impacts from visitors to heathland, as presented in the VMP, is summarised in Figure 1:

Figure 1. Impacts of recreation on heathland.



1.7 The results from the research summarised in the VMP shows clear and unequivocal effects of human activity on breeding Nightjars and Dartford warblers. This is based on careful recording of the distribution of recreational activities and the actual nest locations of breeding birds. Effects range from lower densities of breeding birds, to higher failure rates from predation and direct disturbance, as well as later breeding and fewer broods.

1.8 Additional effects from human activity are as a result of increased nutrient load as a result of dog waste. Heathland systems are generally poor in nutrients and many of the plant species can only survive and compete successfully on soils with low nutrient availability. Enhanced nutrient levels in heather plants can speed up the growth cycle so that aging occurs more rapidly, the plants become more vulnerable to cold weather effects or drought and can encourage more frequent attacks by insects, particularly heather beetle. A range of grass species benefit from increased nutrient levels and one of these, purple moor grass, has displaced heathland vegetation on many heaths.

1.9 Long-term changes to the car parks (layout, surfacing, etc.), linked with improved interpretation, signage, provision of dog waste bins and promoted trails were therefore identified as priority measures for the plan. This included significant investment in reorganising the provision of car parking to focus access in specific (less sensitive) areas. The long-term intention of this measure is to protect sensitive species and habitats by ensuring that diffuse access across the heaths is reduced. As a result of visitors being directed to a number of promoted car parks, key behavioural messages can be more easily communicated to a greater number of visitors, either by interpretation, signage and/or staff.

1.10 In April 2018, the Habitat Regulations Executive Committee (HREC) approved commissioning a consultant report to look in detail at the principles, methodology and potential costs relating to a review of visitor access on the heaths. The key objective of the report was to limit the impact of visitors on the designated features of the heaths.

1.11 Working in close partnership with EDPHCT and reviewed by the officer working group (OWG), a consultant brief (included here as Appendix A) was prepared and sent to 5 consultancies.

1.12 The consultant brief recognised that the heaths are important for a number of additional reasons and that there is an interplay of a range of factors to be considered. The importance of these factors are acknowledged in the supporting objectives listed, which include:

- ) Protect the aesthetic of the landscape and character of the heaths.
- ) Limit impacts on other site features (i.e. Scheduled Ancient Monuments (SAM)).
- ) Prevent antisocial behaviour.
- ) Ensure visitor safety and minimise liability.
- ) Ensure financial viability regarding long term management.

1.13 Three consultancies quoted for the work and following scoring by the OWG, AGB Environmental Ltd (AGB) were awarded the contract. AGB were represented locally by Roger Worthington, with significant experience of working with Forestry Commission England. Mr Worthington's previous experience included work on the rationalisation of 100+ car parks across the New Forest with the purpose of protecting sensitive habitats and concentrating visitor access to the most robust sites. Additionally, Mr Worthington had lead the redevelopment of Haldon Forest Park, preparing the feasibility report, project initiation document and the planning application drawings and submission.

## **2. The Pebblebed Heaths Visitor Access Advisory Report.**

### **Research**

2.1 Following 6 months of scoping, research, design and comprehensive stakeholder engagement, the Pebblebed Heaths Visitor Access Advisory Report was submitted on 28<sup>th</sup> May 2019. This advisory report is available to view online<sup>1</sup> and forms Appendix B of this report. Due to the size of the document it has not been possible to include in the agenda in the same way as with the other appendices. The main recommendations in the advisory report are to install extra dog waste bins, new signs showing trail maps and changes to the layout of car parks to make them easier and safer to use, prevent erosion and protect historic features and the landscape.

2.2 In consideration of its key objective, the report begins with an appraisal of the primary SPA/SAC conservation interest features of the sites. Indeed, the report benefits hugely from the longstanding and comprehensive monitoring of the heaths. As detailed in the separate, 2016 "Providing Space for Nature" report<sup>2</sup>:

"There have been a number of vegetation surveys on the Pebblebed Heaths over the decades of varying degrees of detail... recent surveys...describe, classify and map vegetation communities using the methodology of the National Vegetation Classification (NVC)... all areas of the heathland have been surveyed following NVC methodology at least once in the last decade."

"National surveys for the Dartford Warbler have been carried out in 1974, 1984, 1994 and 2006, with data collated by the British Trust for Ornithology (BTO). In addition, from 1989 the Pebblebed Heaths Conservation Trust, RSPB staff, ecological contractors and volunteers have monitored this species annually using the Common Bird Census methodology."

"National surveys have also been the primary means of monitoring the Nightjar population, with these carried out in 1974, 1981, 1992, 2004 and 2010. RSPB staff and volunteers have monitored Aylesbeare and Harpford Commons annually for this species since 1976, Withycombe Raleigh from 1995 and Venn Ottery (East) from 1996."

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<sup>1</sup> [www.southeastdevonwildlife.org.uk/visitors](http://www.southeastdevonwildlife.org.uk/visitors)

<sup>2</sup> "East Devon Pebblebed Heaths – Providing Space for Nature" (Dr S Bridgewater & Lesley Kerry, 2016)

“...the primary focus of annual survey work is the Southern Damselfly ..., with population counts made at the three known existing sites on the heaths, with historical data available from 1977 (Aylesbeare Common) and 1994 (Colaton Raleigh Common). The Southern damselfly was reintroduced onto Venn Ottery Common in 2007 and has been monitored annually since this date.”

2.3 The results of recent monitoring data, with key breeding territories and mire (wet or boggy ground suitable for the Southern damselfly) habitats, were overlain on detailed maps of the heaths to ascertain the most sensitive areas. Key points of visitor access were then compared against this map and helped to begin to give some indication of how visitor access could be managed into the future. As the breeding territory information of vulnerable species is highly sensitive, this data was not included in the final mapping shown in the advisory report.

2.4 The advisory report draws upon a number of key reference documents in consideration of the range of factors to be taken into account:

- ) East Devon Local Plan 2013-2031.
- ) South East Devon European Site Mitigation Strategy.
- ) East Devon Heaths SPA & Pebblebed Heaths SAC: Visitor Survey Report.
- ) East Devon Pebblebed Heaths Visitor Management Plan.
- ) Clinton Devon Car Park Survey Report.
- ) Police crime and incident reporting.
- ) Devon and Somerset Fire and Rescue, Woodbury Common Tactical Plan.
- ) Royal Marine Access.
- ) Pebblebed Heaths: public access path/track network.
- ) East Devon AONB Historic Environment Action Plan, Historic Character Assessment and Management Guidelines.
- ) Formal and informal Car Parking locations.

2.5 An updated audit of both “formal” (established and maintained) and “informal” (mainly roadside) car parking spaces was established to act as a baseline. This audit identified 293 current formal spaces across 11 car parks and 153 informal spaces across 43 diffuse areas of the heaths. This resulted in a total of 446 spaces.

2.6 Leading on from this understanding, the report also considers the primary access routes to the heaths for visitors coming by road, combined with existing survey results which identify where visits originate. New visitor pressure from future developments are identified from Exmouth in the south and Cranbrook to the north west.

2.7 Appendix B<sup>3</sup> (pgs. 26/7) provides maps of the heaths with all of the car parking areas identified. Four key roads bisect the heaths and the main formal car parks sit adjacent to these roads. They provide the nearest access points for local communities but are in unplanned locations, are poorly laid out and have issues of ponding and potholing. They are also mostly screened by dense vegetation that leaves them prone to vandalism and anti-social behaviour.

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<sup>3</sup> [www.southeastdevonwildlife.org.uk/visitors](http://www.southeastdevonwildlife.org.uk/visitors)

2.8 Other scattered car parking on the heaths occurs in any available verge, lay-by or gateway. This informal parking leads to a number of issues, including widespread habitat disturbance, difficulties for neighbours and emergency services when roads are blocked and lack of opportunities for engaging with visitors about key issues and messages.

### **3. Concept and Strategic Principles**

3.1 Research from previous studies as identified in 2.4 (above) identifies that visitors to the EDPH are mainly local, visit frequently throughout the year, overwhelmingly use a car, arrive for a short walk with a dog and have been doing so for many years.

3.2 The principles set out in the advisory report seek to provide for these key visitors and future visitors, without attracting increased numbers, in a manner that makes for an enjoyable and informative visit, whilst minimising the disturbance to protect species and habitats by ‘steering’ visitors towards car parks that are away from sensitive locations and towards those that have less impact on protected habitats and species:

1. A place of entry, to retain and develop the formal car parks that are as close as possible to the points of entry on the heaths and adjacent to the principle roads. To reduce car movements across the heaths and the scattered informal parking that occurs as a consequence.
2. Moving visitors away from sensitive locations to provide a “gathering in” of scattered informal parking. To close some informal roadside parking where wildlife and habitats are likely to be adversely affected by disturbance. To relocate roadside parking to formal car parks.
3. Promoting less sensitive locations where the surrounding habitat does not have sensitive habitats or protected species. To provide access from retained formal car parks to existing Public Rights of Way (PRoW), with information, interpretation and messaging promotes responsible public access.
4. No net increase so as to maintain the current number of car parking spaces. Proposals seek to maximise the number of spaces available to equally balance the number of roadside parking places that are proposed to be closed. To increase the number of parking spaces available is likely to increase visitor numbers at peak times of the day/month/season and result in increased damage to habitats and disturbance to ground nesting birds.
5. Creating “nodes” in the formal car parks as the starting point for promoted trails and the opportunity to direct people away from sensitive areas at key times of the year. Car parks which create a welcoming and attractive setting where visitors can engage with interpretation, messaging and wardens about the heaths and responsible dog walking.
6. Appropriate design to promote the development of good design and build standards that are appropriate to a countryside location within an AONB;

avoiding urban design, materials and finishes. Improving visibility within the car parks and from adjacent minor roads improves surveillance from other site users, passing motorists and the police.

7. Flexibility in controlling access and visitor numbers at certain times of the year (or for specific events) by adopting the partial, phased or seasonal closure of several car parks.
8. Efficiency. Improving the arrangement and construction of the existing formal car parks to maximise capacity and reducing long term maintenance costs. This makes the proposals more financially sustainable and ensures that other investment can be focused on the protection of species and habitats.

#### **4. Analysis and survey**

4.1 Applying the strategic principles outlined in section (3) above, as part of a desk study, each of the formal car parks were assessed in terms of their proximity to the key protected species and in the context of PRow (and other trails suitable for promotion in keeping with mitigation aims to reduce disturbance).

4.2 In February 2019, site visits to the main formal and informal car parks were undertaken with AGB and the respective site managers from EDPHCT, RSPB and DWT. These site surveys, with consideration of specific issues, informed the development of a Strengths, Weaknesses, Opportunities and Threats (SWOT) analysis of each site.

4.3 The SWOT analyses for each car park were used to prepare draft concept proposals, considered in the context of the strategic principles and the following concept design principles:

1. Use the existing footprint of formal car parks and entrances, as far as possible. This reduces disturbance/loss of habitat and the need for formal planning approval.
2. Maintain existing features and materials so as not to adversely affect the SPA/SAC soil characteristics and reflect the landscape characters of the AONB.
3. Restore the countryside character damaged by road-verge parking, through natural, physical measures, such as bunds and ditches.
4. Adjust formal car park layouts to protect and preserve SAMs.
5. Establish management principles for adjacent vegetation to reduce the likelihood of vandalism and anti-social behaviour.
6. Keep access for management, emergency services and MOD separate to public parking areas as far as possible.
7. Improve drainage provision within the construction proposals to improve flood attenuation.
8. Further principles as outlined in section 10 of Appendix B <sup>4</sup>(pgs. 68-9).

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<sup>4</sup> [www.southeastdevonwildlife.org.uk/visitors](http://www.southeastdevonwildlife.org.uk/visitors)

4.4 A further site visit with AGB, the EDPHCT site manager and a consultant civil engineer was undertaken in late March 2019. This survey focused on three “typical” formal car parks and was aimed at achieving a greater understanding of engineering options. This provided further detail behind the car park proposals and cost estimates, particularly in respect of materials, vehicle specifications, entrance arrangements, width of spaces, drainage and turning circles.

## 5. Draft concept designs

5.1 Proposals for each of the formal car parks are put forward in section 11 of Appendix B<sup>5</sup> (pgs.79-104) and each contains a summary of the cost estimate for the work proposed. Feedback given by the Devon Countryside Access Forum (DCAF) put forward specific design principles for all-ability access from car parks to surrounding trails.

5.2 In the preparation of the report, two alternative cost options were modelled against the recommended proposals. These options were:

- ) Additional capital investment (for reduced ongoing maintenance)
- ) Reduced capital investment (with anticipated increase in maintenance)

5.3 The recommended proposals look to adopt a balanced approach between the costs of undertaking the more expensive work of creating a robust parking surface with the ongoing revenue cost of maintaining those surfaces. Whilst upgrading all the car parks to a tarmac finish would result in the solution requiring the least maintenance, it would not be in keeping with the landscape character of the heaths. However, due to the increased wear and tear at the car park entrances, tarmac is the preferred option for these areas.

5.4 Any future improvements, closures or changes to the car parks need to be well planned in advance. To reduce the potential for disruption and to align most appropriately with the available capital it is logical to phase the implementation of any agreed works over time. As the fundamental driver of the work, the report rightly identifies that the protection of habitats and species should be the focus of investment. The report identifies 3 groupings or phases of work to align with this logic.

5.5 The report goes on to point out that careful consideration needs to be given to ensure some car parking options remain open for visitors to use whilst others are closed for refurbishment.

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<sup>5</sup> [www.southeastdevonwildlife.org.uk/visitors](http://www.southeastdevonwildlife.org.uk/visitors)

5.6 The concept designs were reviewed by stakeholders at two workshops in early March and late April 2019. Organisations represented included:

- ) Clinton Devon Estates
- ) East Devon Pebblebed Heaths Conservation Trust
- ) South East Devon Habitat Regulations Partnership (SEDHRP)
- ) East Devon District Council (Planning)
- ) Natural England
- ) Devon and Cornwall Police
- ) RSPB
- ) East Devon AONB
- ) Devon Countryside Access Forum

Comments and feedback from these workshops were incorporated into the final concept designs.

## **6. Car park charging**

6.1 The advisory report does not recommend the introduction of car parking charges, nor does it form part of the current management proposals from any of the site managers/landowners. Reasons for this include a likely negative response from members of the public who are accustomed to free car parking and the potential for increased roadside parking, which the proposals aim to reduce.

6.2 Whilst it remains within the gift of the landowners to review car parking charges in future (for example in the interests of helping to fund the considerable costs of ongoing management and maintenance) this could displace motorists onto verges and gateways. If not addressed, this may undo the aim of ensuring that visitors access the heaths from designated locations where key behavioural messages can be conveyed.

## **7. Clearways and roadside parking.**

7.1 Where it applies on highways in designated zones, the Clearway sign (a red cross on a blue background) denotes no stopping on a road carriageway. Any vehicles parked in Clearway restricted areas may be issued with a Penalty Charge Notice by a Civil Enforcement Officer.

7.2 Vehicles may stop in a layby or on a verge if it is not stopped on the carriageway. Therefore, on the Pebblebed Heaths a Clearway will not prevent verge, layby or roadside parking unless it is accompanied by physical barriers such as bunds, ditches or other obstacles.

7.3 The report identifies the provision of free parking and the improvement of formal car parks as sufficient incentive to prevent roadside parking. It suggests that this, combined with physical obstacles to prevent roadside/verge parking will achieve the desired outcome without the need for a Clearway.

7.4 If the measures are insufficient then Clearway orders are identified as a potential option for any problem areas which subsequently become apparent.

## 8. Pebblebed Heaths visitor access consultation - planning and promotion.

8.1 A consultation plan was produced with key stakeholders in July 2019, and included the following items:

- ) Pre-launch actions.
- ) General principles.
- ) Communication – web and social media.
- ) Outside bodies to be consulted.
- ) Consultation methods.
- ) Consultation events.
- ) Comments/responses – handling.
- ) Timescale plan.
- ) GDPR considerations.

8.2 A letter introducing the rationale for the work and the intention to hold a public consultation was sent to all relevant parties 7 weeks prior to the launch. Recipients of this letter included:

- ) 12 Town and Parish Councils (those nearest to the heaths).
- ) MP for East Devon and other local politicians.
- ) District and Ward councillors.
- ) Natural England.
- ) Historic England.
- ) Devon County Council.
- ) Devon Community Access Forum (DCAF).
- ) Devon Archaeological Society.
- ) Butterfly Conservation.
- ) Amphibian and Reptile Conservation Trust
- ) British Horse Society.
- ) Ramblers.
- ) Devon Birds.
- ) Campaign to Protect Rural England (CPRE).
- ) Open Spaces Society.

8.3 In the weeks prior to the launch of the consultation, a leaflet was produced which identified the rationale for the work, included a page relating to frequently asked questions (FAQs) and contained an A3 pull-out map of the heaths. It was distributed to local libraries and at a stand at local farmers markets. The front cover of the leaflet was used as a poster which was put up at all the formal car parks on the heaths and on noticeboards in local villages. The leaflet is included as Appendix C.

8.4 The SEDHRP website was updated to include specific pages which hosted the advisory report, provided answers to FAQs, hosted images of each of the proposals, and provided a link to the online visitor survey. The survey was roughly divided between site specific proposals and other proposals which apply across the wider area (waymarked trails, dog bins, no charging, etc.). The survey questionnaire is included as Appendix D and images of the proposals (as they would appear when completed) are included as Appendix E.

8.5 The consultation launched on September 23<sup>rd</sup> 2019 and consisted of 3 public events (2 at popular car parks during the day and 1 at Exmouth Town Hall in the evening) and a presentation to Newton Poppleford & Harpford Parish Council. Notes of conversations held at the public events were taken and compiled for inclusion in the results report. Feedback was also received by post and email.

8.6 The consultation was also promoted through a number of press releases, through various social media channels, 6 parish magazines, the EDDC website and BBC Radio Devon covered the story on 23.9.19 with an interview with Cllr Susie Bond - Chair of HREC and Kim Strawbridge (EDPHCT site manager).

## **9. Pebblebed Heaths visitor access consultation - results.**

9.1 A total of 94 completed questionnaires were received, 92 by individuals and 2 by organisations. 10 individuals and 3 organisations submitted comments by email rather than by completing the questionnaire.

9.2 Where respondents commented on the proposals for individual car parks, their main concern was around the proposal for a height restriction across the car parks, particularly how it would affect access for horseboxes and horse trailers. There were a lot of comments stating the car parks needed to remain accessible to vehicles transporting horses both in terms of the height restriction and having enough space. A few were also concerned about the height restriction limiting access for campervans and vehicles transporting bicycles.

9.3 There was significant support from respondents to the proposals affecting the wider area:

- ) 93% agreed with keeping parking free of charge, 3% disagreed.
- ) 76% agreed with improving the surfacing of the car parks, 7% disagreed.
- ) 72% agreed with sensitively waymarked trails / routes on the Pebbled Heaths, 12% disagreed mainly as it would negatively affect the wild and natural feeling of the heaths.
- ) 84% agreed with having new freestanding information boards in the car parks, giving information on the area around them. 1% disagreed.
- ) 83% agreed with increasing the visibility of the car parks to deter anti-social behaviour, 6% disagreed.

9.4 The most common responses to all the proposals were:

- ) The height restriction will mean horseboxes can't use this car park and may disadvantage some disabled users. This is unfair and will restrict the amount they can use the bridleways/heaths.
- ) There needs to be room for horseboxes and trailers to turn and park.
- ) I would welcome improvements to the car park surface.
- ) I support the proposals.
- ) The height restrictions will mean I can't go cycling there, my bicycle is on my roof / in my large van.
- ) I would welcome improvements to the entrance.
- ) If you close Woodbury Castle to most cars people, including families and dogs, will have to cross a busy road, which will be too dangerous.

- ) Car parks must be kept open as they are well used. Closing them will restrict access to the heaths.

9.5 Full results and redacted responses (to remove personal details) are included here in Appendices (F) and (G). The results and responses were considered and debated by key stakeholders on 12<sup>th</sup> November 2019 and the SEDHRP OWG on 18<sup>th</sup> November 2019, in order to agree recommendations to HREC. All comments and feedback received during the consultation process were considered in order to balance the legal obligations of the protected areas with the legitimate interests of users.

## 10. Analysis

10.1 It can be seen that a substantial number of responses to the survey concern the proposals to install height restriction barriers at the entrances to the formal car parks. This measure aims to prevent unauthorised access, overnighting, reduce fly tipping and prevent parking by large haulage lorries which affect the surfacing, block access and take up space which could otherwise be used by visitors.

10.2 In order to respond to these requests it is recommended that a compromise is reached. This would see the main car parks in close proximity to the key roads (Joney's Cross, Warren, Estuary, Four Firs) retain height barriers. Other car parks (Model airfield, Wheathill) will have height barriers installed but these will be locked open (i.e. no height restriction in place), use of the car parks will be monitored and the height restriction imposed if problems arise. This would address the concerns of site managers relating to unauthorised use of the car parks whilst leaving a wide choice of other car parks available for use. The situation regarding height restrictions at the small informal parking areas (Stowford, Squabmoor, Frying pans roadside) will not change (i.e. no height restriction). It would remain within the gift of the landowners to keep this arrangement under review.

10.3 There are also a number of responses concerning the proposal to reduce car parking at Woodbury Castle. These relate to potential issues of safety if people park in the Estuary car park and cross the busy/fast B3180 road. There was also misinterpretation by some that the car park was marked for closure.

10.4 These proposals were drawn up to address multiple issues at this location. The routes that are accessed from this point can also be accessed from other car parks (Four Firs, Model Air, Warren) which are being improved as part of the overall plan. Improvements would be made to these alternative locations before any changes occurred at the Castle, the hope being that many people would naturally relocate (particularly to Four Firs) easing the pressure at the castle without the need to cross the B3180. The strong connection that the existing visitors have to this location may undermine this concept and so a common sense compromise is proposed as an alternative.

10.5 The capacity of castle car park has already been reduced by a small proportion in the last year by the landowner, so it is recommended that this lesser reduction is formalised and the situation monitored. It remains in the gift of the landowner to review this arrangement in the future should issues arise. As this amendment will not see a significant reduction in spaces at this car park, reduction needs to be realised elsewhere to ensure no net gain in capacity across the site - this is likely to be at Estuary View. The implications from this amendment need to be worked through before the final plans are drawn up to ensure it complies with the design concepts.

10.6 Respondents generally welcomed the creation of an all-ability trail at Estuary View and understood the reasons behind moving the vehicle parking from the viewpoint back to the roadside. A small number of people stated that they wanted to be able to continue parking at the viewpoint as they would not be able to use the trail. The trail would be designed to enable standard wheelchair access with rest points along the <200m route and seating at the viewpoint. The landowner has indicated that they would be receptive to allowing parking at the viewpoint on a small number of occasions during daylight hours but daily opening and locking of the barrier by site staff would be too resource heavy and not a reasonable request.

10.7 There were some responses highlighting the closure of Uphams to public vehicles. This was to separate out Royal Marine and site operation vehicles from the public, with the former utilising Uphams and the later Model Air which is 400m away. This proposal is recommended for action; however the landowner has confirmed that that this area could be made available to public parking on limited occasions and if not to the detriment of the designated features.

10.8 There were requests from people that travel to the site in horse boxes for dedicated horse box parking. This can be accommodated at Wheathill with the back section of the car park signed to be for parking of large vehicles such as horse boxes.

10.9 General request for more parking spaces to be created. This would not be appropriate as it would undermine the core objective of limiting the impact on designated features. Furthermore, the landowner is not in a position to fund increased maintenance costs by increasing parking provision. Although there will be no net gain in spaces, currently many of the spaces are not filled for much of the time. It is the intention of this strategy that parking spaces will be used more efficiently, with a greater proportion of spaces filled at any given time. This will allow some increase in visitor time spent on site but will effectively cap the number of visitors that can be on site at the same time. The strategy can accommodate this level of increase in visitor numbers by mitigating against their impact by reducing diffuse access and behaviour change measures. The site infrastructure is designed to accommodate the local community, whilst remaining mindful not to create a destination.

10.10 Some concern was expressed in relation to the aesthetics and the wild nature of the site. As identified in the VAAR, all designs would be implemented as sensitively as possible to retain the character of the site. Infrastructure such as signage will be kept to the main access points. Any trail markers would be low-key, similar in style to the discs that mark the East Devon Way – see Figure 2, below:

Figure 2. East Devon Way disc markers.



## 11. Conclusion

11.1 The view of those engaged within the consultation have been considered, with the recommendations made taking these views into considerations. There has been a balance between views of site users, site protection and operational requirements.

11.2 The partner authorities have a legal obligation to ensure no net impacts to protected sites as a result of local housing plans. To be certain of no net impacts from recreation, robust and effective management of access to the East Devon Pebblebed Heaths is required.

11.3 The visitor access proposals outline significant changes to the arrangement and provision of access to the heaths for a number of years. They are needed in the context of a significant increase in the local human population, associated recreational activities and the potential for significant impacts to protected species and habitats. The existing and proposed number of car parking spaces are shown in Table 1, below:

Table 1. Car parking tally – existing and proposed.

Parking space across the Pebblebed Heaths	Current Parking	Proposed Parking
Formal Parking Spaces	293	293
Informal Parking Spaces	153	119
<b>Total</b>	<b>446</b>	<b>412</b>

11.4 It is recommended that the Executive Committee receive a further report in April 2020 which outlines the recommended expenditure and phasing of access improvements as part of the 2020-21 annual business plan and 5 year delivery plan.

**Naomi Harnett, Principal Projects Manager**

**Neil Harris, Habitat Regulations Delivery Manager**

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

**Natural England comment:**

The management of car parking on the East Devon Pebblebed Heaths, with the primary objective of safeguarding the SPA protected bird species and SAC heathland habitat, is an important part of the overall mitigation strategy. Natural England notes the findings of the consultation exercise, which will inform the proposals going forward.