

# Coastal Access Variation Report VR1

## Proposed Changes to the England Coast Path at Dunball Wharf and St Audries Bay, Somerset

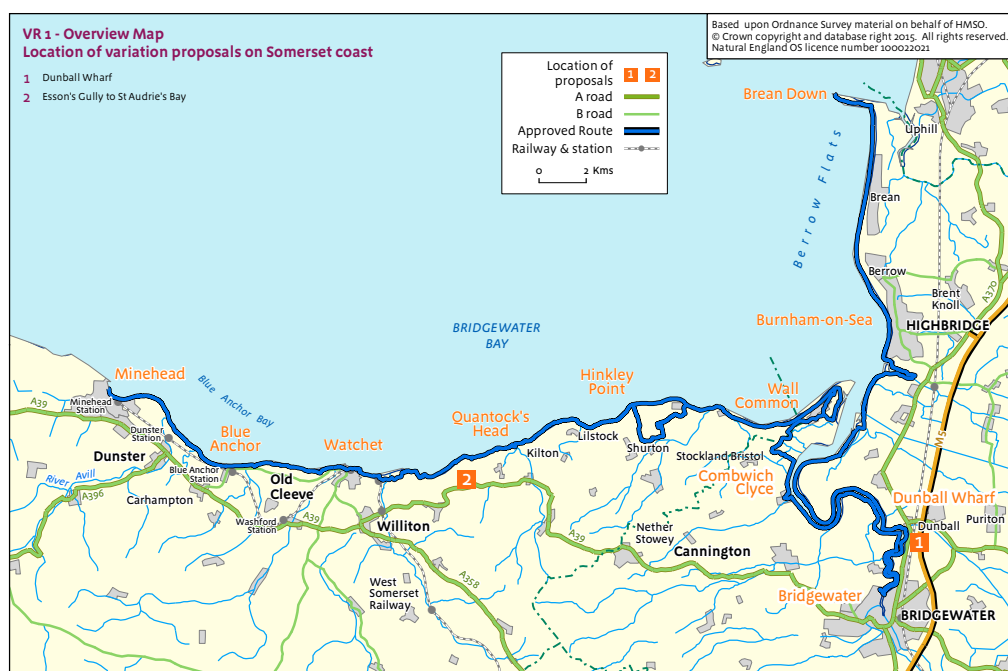
Natural England's Variation Report to the Secretary of State  
24 September 2015

### Purpose of this report

Natural England has a statutory duty under the Marine and Coastal Access Act 2009 to improve access to the English coast. The duty is in two parts: one relating to securing a long-distance walking route around the coast; the other to creating an associated "margin" of land for the public to enjoy, either in conjunction with their access along the route line, or otherwise.

On 10 July 2014 the Secretary of State approved Natural England's proposals relating to [Brean Down to Minehead](#) in Somerset. The public rights of access to this stretch have yet to commence. Since the approval of the report, it has become clear that two changes are necessary to the route of the England Coast Path. This report contains Natural England's proposals relating to those changes, which are at the following locations shown on the overview map below:

- 1 at Dunball Wharf near Bridgwater, Somerset.
- 2 from Essons Gully to St Audries Bay, West Somerset.



In order for these proposed changes to come into force they must be approved by the Secretary of State.

It is recommended that Natural England's approved [proposals](#) relating to this stretch are read in conjunction with this report. In particular the Overview provides context to many of the issues discussed within this variation report.

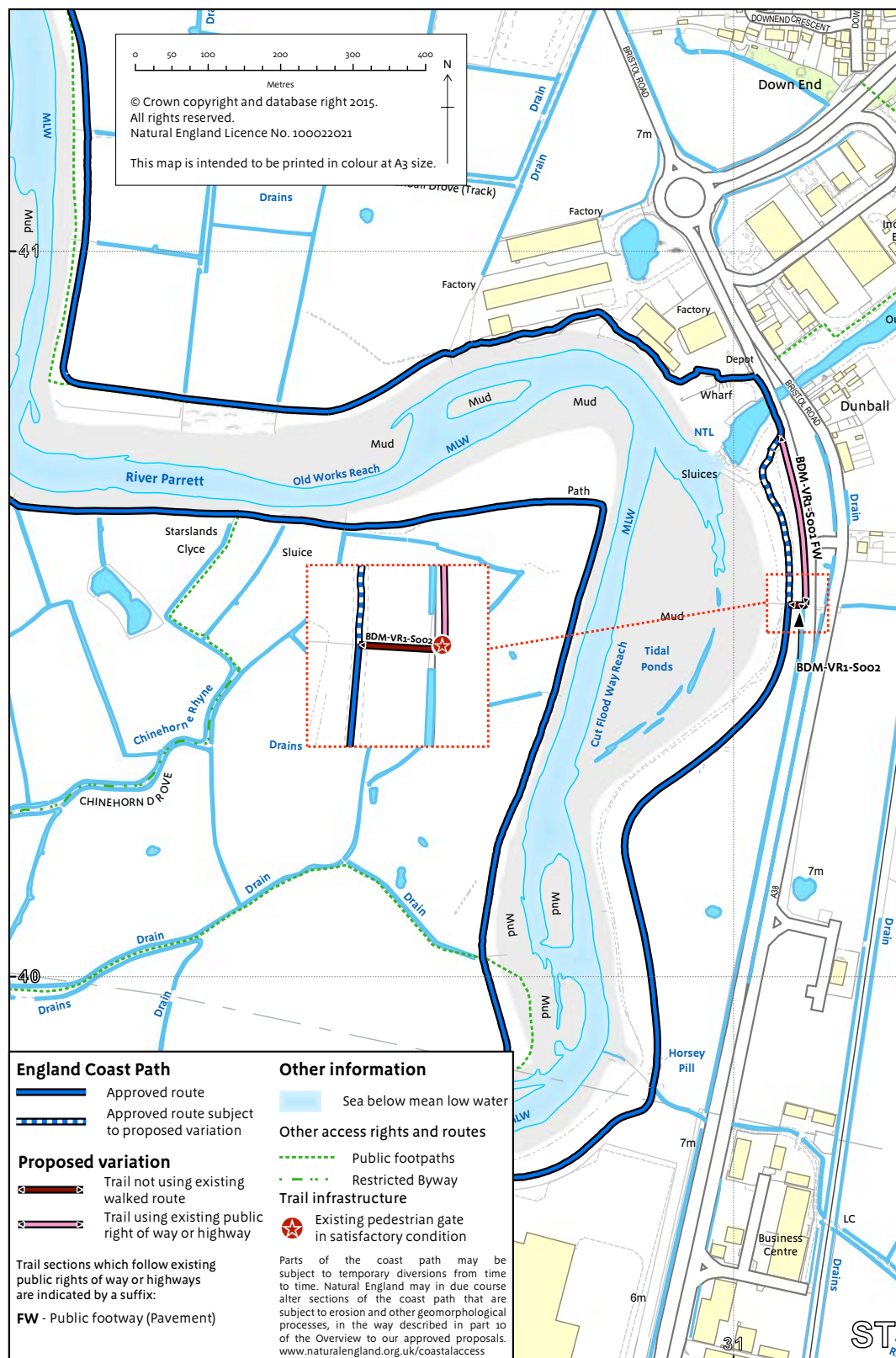
# Variation 1: Dunball Wharf

## Introduction

**Start Point:** Dunball Wharf north (grid reference: ST310407)

**End Point:** Dunball Wharf south (grid reference: ST310405)

**Relevant Maps:** VR1- Map 1



## Understanding the proposals and accompanying maps:

### Reason for variation:

The approved route of the England Coast Path would install the England Coast Path along an existing public footpath through the working area of Dunball Wharf (see VR1- Map 1).

However, since this alignment was approved, the Environment Agency has determined that it is necessary to install new flood management facilities at the wharf. As a consequence, the route of the England Coast Path needs to be realigned to avoid the new installation and its curtilage.

### Proposed variation:

Our proposal (see VR1- Map 1) is to re-route the path around the new flood management facilities by taking it further along the pavement (route section BMD-VR1-S001) to a new access point into the field to the south (route section BDM-VR1-S002) where the path would continue along the existing flood bank as originally approved.

As a consequence of these proposed changes, all land seaward of the trail would become part of the coastal margin. However the new flood management facility is secured by fencing and gates and will not be available for public access.

### The Trail:

The proposed trail consists of a length of pavement with existing access rights and a short new section of path between the pavement and the crest of the flood bank.

### Accessibility:

The proposed route is considered to be suitable for most people with reduced mobility.

### Where we have proposed exercising our discretion:

Natural England's approved report proposes that the trail should include a route around the estuary of the River Parrett, extending upstream from the open coast as far as Saltlands Bridge, Bridgwater which is the first bridge with pedestrian access. This is to establish a continuous route which will link Bridgwater with the open coast to either side of the River Parrett. The proposed variation of the trail covered in this report forms part of this estuary route.

We propose to use our discretion to map the landward boundary of the coastal margin adjoining route section BDM-VR1-S001 to the landward edge of the pavement to add clarity to the extent of access rights.

**See part 3 of the Overview to the original report - 'Understanding the proposals and accompanying maps', for an explanation of the default extent of the coastal margin and how we may use our discretion to adjust the margin, either to add land or to provide clarity.**

Our proposal to exclude access rights to tidal mudflats and saltmarsh that form part of the coastal margin on this part of the river was approved by the Secretary of State in July 2014. As a consequence this report is not required to deal with that issue.

We do not consider it necessary to propose any additional restrictions and exclusions in relation to the newly proposed trail and margin. However, access rights to the spreading room would be subject to the national restrictions on coastal access rights. These restrictions would not apply to public rights of way.

**See Annex 2 of the Overview to the original report for detail of the national restrictions on coastal access rights.**

### **Future Change:**

The North Devon & Somerset Shoreline Management Plan (SMP2) identifies (in the short to medium term to 2055), a policy of 'hold the line' for the stretch of coastline. We are not proposing to recommend that the proposed varied route of the trail is able to roll back.

The trail between Dunball and Bridgwater may be subject to a change of status and surface pending consultation on a proposal to create a cycleway in this area. It is likely that for the most part, the cycleway will follow the line of the trail and no changes to the route of the trail are anticipated.

At the time of preparing the report, we do not foresee any other need for future changes to the access provisions proposed for the length of coast described in this variation report.

### **Physical establishment of the trail**

Signs would be necessary to guide people along the new route. A pedestrian gate has already been installed to allow people to reach the flood bank from the pavement as shown on VR1- Map 1.

Our estimate of the capital costs for these works is £650. This is an decrease of £900 compared to the original route set out in our report to the Secretary of State on 17 October 2013. This estimate is informed by advice from Somerset County Council.

### **Maintenance of the trail**

Ongoing maintenance of the trail would be necessary from time to time. Our estimate of the annual cost to maintain the part of the trail affected by the proposed variation is £10 (exclusive of any VAT payable). This represents no significant change to our overall estimate for the approved route, as set out in our report to the Secretary of State on 17 October 2013. Both estimates take account of the formula used to calculate Natural England's contribution to the maintenance of other National Trails.

# Commentary on Maps.

## Section Details – Map VR1- Map 1: Dunball Wharf

1	2	3	4	5	6a	6b	7
Map(s)	Route section number(s)	Current status of this section	Current surface of this section	Roll-back proposed?	Landward boundary of margin (See maps)	Reason for landward boundary discretion	Proposed exclusions or restrictions
VR1- Map 1	BDM-VR1-S001	Public footway (Pavement)	Tarmac/ concrete	No	Pavement edge	Clarity and cohesion	N/A
VR1- Map 1	BDM-VR1-S002	Not an existing walked route	Grass	No	Landward extent of the trail	Default, no additional margin proposed	N/A

### Formal Proposals

- Below are our formal proposals to the Secretary of State for the variation to the approved route proposed in this report.
- They should be read in conjunction with the relevant maps (map VR1- Map 1).
- The commentary above explains the practical effect of these proposals.

## Formal Proposals – Dunball Wharf to Horsey Pill

### Discretion to include an estuary

Natural England already has approval from the Secretary of State for its proposal in its original report to exercise its functions as if the sea included the estuarial waters of the River Parrett as far as Saltlands Bridge, Bridgewater. The proposal in this variation report falls within this area.

### Proposed route of the trail

The route is to be at the centre of the line shown on VR1- Map 1 as the proposed route of the trail.

### Landward boundary of coastal margin

Adjacent to route section BDM-VR1-S001, the landward boundary of the coastal margin is to coincide with landward edge of the pavement shown as the trail on VR1- Map 1.

### Local restrictions and exclusions

At the time of writing this report, there are no new proposals for local restrictions or exclusions in relation to this length of coast.

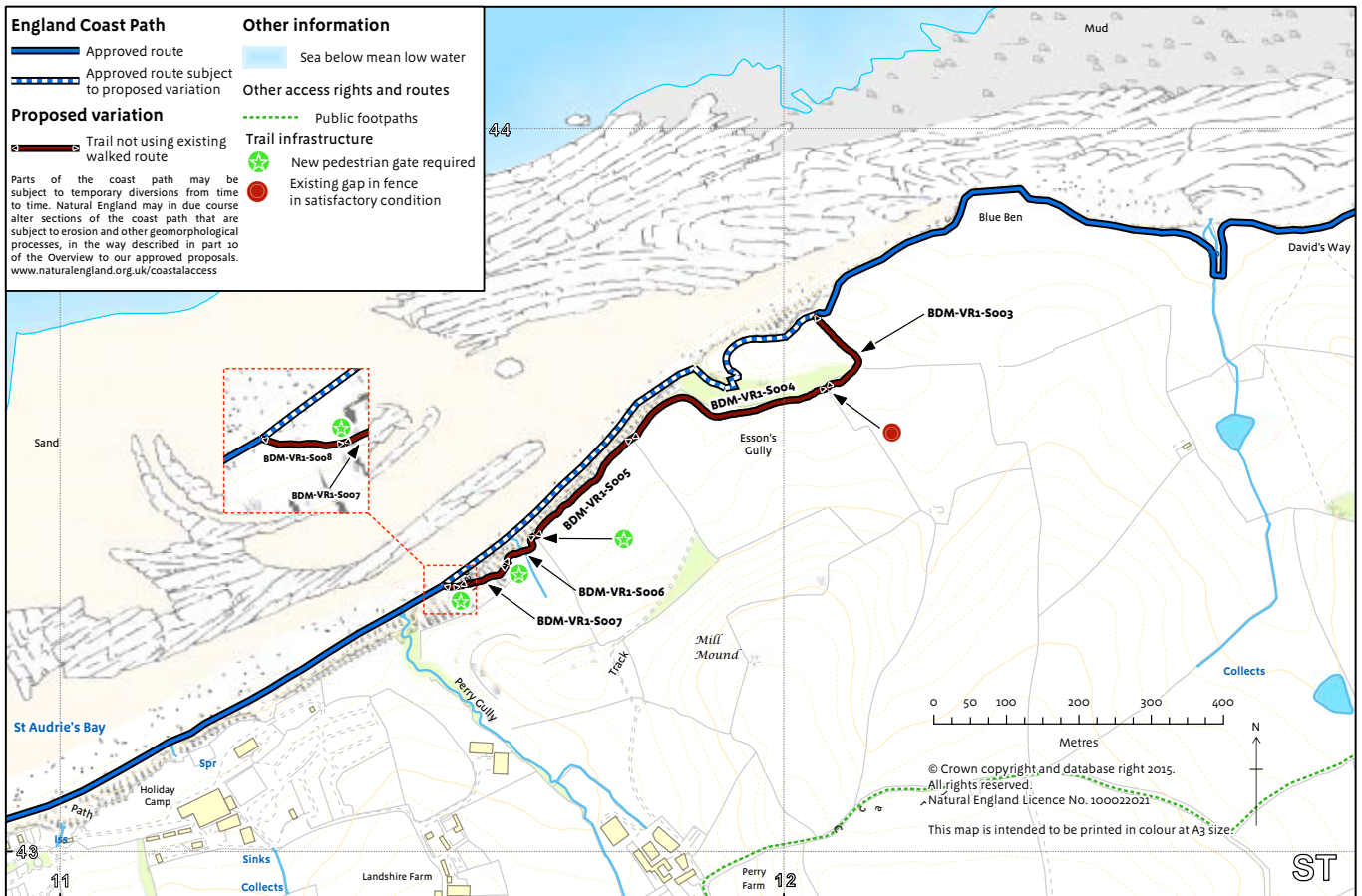
### Alternative routes

This variation report does not include proposals for alternative routes.

# Variation 2: Essons Gully to St Audries Bay

## Introduction

<b>Start Point:</b>	<b>Esson's Gully</b> (grid reference: ST120437)
<b>End Point:</b>	<b>St Audries Bay</b> (grid reference: ST115433)
<b>Relevant Maps:</b>	<b>VR1- Map 2</b>



## Understanding the proposals and accompanying maps

### Reason for variation:

The approved route of the England Coast Path follows an existing walked route west along the cliff top from Quantock's Head to David's Way, after which it comprises a new access route further along the cliff top as far as Essons Gully. At Essons Gully it descends the gully to the beach at St Audries Bay, where it continues westwards along the beach – see VR1- Map 2. The approved report set out the reasons at the time for proposing that the route should descend to the beach at this point via Essons Gully.

The descent at Essons Gully from the cliff top to the beach has proved much more difficult to establish than was envisaged at the time the proposals were put forward. Initial exploratory works by the land owner had suggested that the route was viable but subsequent erosion during the major winter storms of 2014/15 caused unexpected damage that compromised the original means of descent. Engineers conducted detailed investigations and advised that installation of steps would be the most cost efficient means of providing a descent to the beach at this point, with an estimated cost of £145,000. The tenant then came forward with an alternative, more cost-effective route proposal which would avoid the need for a descent at Essons Gully, as described below.

### Proposed variation:

Our proposal is to re-route the trail along the cliff top landward of Esson's Gully and westwards to the top of a cliff slope located just east of Perry Gully as shown on VR1- Map 2. At this point the route would descend the slope where it would re-join the approved route and continue westwards along the beach at St Audries Bay.

As a consequence of these changes, areas of cliff that are seaward of the newly proposed route would become part of the coastal margin. There would be no additional areas of spreading room to the landward side of the trail.

### The Trail:

Consists exclusively of new sections of path west along the cliff top from the top of Essons Gully to and down the cliff slope to the east of Perry Gully, connecting with the existing approved route on the beach below.

Follows the line of the cliff edge at a safe distance and maintains good views of the sea, except for a short section landward of Essons Gully where the view is blocked by trees.

Part of the proposed route (the cliff slope just east of Perry Gully) at St Audries Bay falls within the Blue Anchor to Lilstock Site of Special Scientific Interest (SSSI). After consultation with Natural England specialists we have concluded that our proposals would not have any detrimental effect on the geology for which the site is designated.

### Accessibility:

Generally, there are no artificial barriers to access on the proposed new route, but it may not be entirely suitable for people with reduced mobility because it uses a field margin along the clifftop and then descends a slope just east of Perry Gully.

### Where we have proposed exercising our discretion:

We have not exercised our discretion to propose an adjacent physical feature as the landward boundary of the coastal margin along the proposed route variation.

**See part 3 of the Overview to the original report - 'Understanding the proposals and accompanying maps', for an explanation of the default extent of the coastal margin and how we may use our discretion to adjust the margin, either to add land or to provide clarity.**

It is not necessary to propose restrictions and exclusions in relation to the newly proposed trail and margin. Access rights would be subject to the national restrictions on coastal access rights.

**See Annex 2 of the Overview to the original report for detail of the national restrictions on coastal access rights.**

### Future Change:

The soft cliffs along this length of coast are undefended and subject to erosion and as a consequence we propose that the new trail on this length of coast would be subject to roll back, as is the case for the approved clifftop trail further east. This would mean that the proposed route of the trail would be able to change without further approval from the Secretary of State in response to coastal erosion or other geomorphological processes, or encroachment by the sea. See table "Section Details" below for further information.

At the time of preparing the report, we do not foresee any other need for future changes to the access provisions proposed for the length of coast described in this chapter.

## Physical establishment of the trail

Below we summarise how our proposed new route for the trail on these sections would be physically established to make it ready for public use before any new rights come into force.

Some physical establishment of the trail would be necessary, including signs and gates to facilitate access along the route. Signs would also be necessary to warn people about high tides on St Audries Bay, which interrupt access along the approved route to the west. One such sign would be placed on the proposed route shown on VR1- Map 2, on the slope leading to the beach (route section BDM-VR1-S007 to BDM-VR1-S008) The content of these signs has already been discussed with the Coastguard, as envisaged in Natural England's original report to the Secretary of State.

In addition we have agreed with the tenant to separate the trail from the adjoining fields to its landward side with new fencing. The fencing would extend from the boundary of the tenant's land (to the east of the area shown on map VR1- Map 2) along the cliff top to the slope leading down to the beach at the eastern end of the proposed variation shown on the map. The fencing will address the concerns originally described in our approved report about the potential impact of new access rights on adjacent land use, in particular clay pigeon shooting and camping on land west of Essons Gully. There would be gates in places along the fence to allow the tenant access to the trail land.

Our estimate of the capital costs for physical establishment of the part of the trail affected by the proposed variation is £30,000. This is an increase of £29,300 compared to the original estimate set out in our report to the Secretary of State on 17 October 2013. However, set in context of the more recent engineer's estimate of £145,000 to establish a descent from cliff top to beach at Essons Gully it represents a far more cost effective means to implement the coast path at this location than implementing the existing approved proposals.

Our estimate is informed by advice from Somerset County Council and discussions with the tenant farmer who manages the land.

There are two main elements to the overall cost:

- Works to facilitate access along the trail itself, including signs, notices, gates, culvert and vegetation clearance.
- Fencing, incorporating farm gates, to separate the trail land from the surrounding farmland but provide farm access to the trail land (includes sections of the approved route to the west of Essons Gully, by agreement with the tenant).

In addition we have included, mindful of the land owner's efforts to establish a level surface for the route originally proposed down Essons Gully and the subsequent erosion there, funding for works aimed to reinstate the gully vegetation.

The table below explains our estimate of the capital cost for each of the main elements of physical establishment described above.

### Estimate of capital costs

Item	Cost of implementation of proposed varied route
Works to facilitate access along the trail	£13,700
Landward fence incorporating farm gates	£13,800
Gully reinstatement works	£2,500
<b>Total</b>	<b>£30,000</b>

Once the Secretary of State has notified her decision on our report, we, or Somerset County Council on our behalf, will consult further with affected land owners and occupiers about relevant aspects of the design, installation and maintenance of the new signs and infrastructure that are needed. They would conform to the published standards for National Trails and the other criteria described in our Coastal Access Scheme.



## Maintenance of the trail

The surface of the proposed route of the trail (with the exception of the slope at route sections BDM-VR1-S007 and BDM-VR1-S008) is subject to an environmental agreement whereby the tenant cuts the vegetation in order to maintain grassland along the cliff top. The tenant has agreed to extend this agreement to include sections of the previously approved route to the east of Essons Gully and a short linking section (part of BDM-VR1-S003). Doing so will provide a more suitable walking surface for users for the agreement period, in addition to the environmental benefits which are the primary objective of the agreement.

Some additional ongoing management and maintenance of the trail will be conducted by the local access authority from time to time, for example to repair or replace signs and gates when necessary and to adjust the route if it is necessary for it to roll back in response to coastal erosion.

Our estimate of the annual cost to the local authority to maintain the part of the trail affected by the proposed variation is £350 (exclusive of any VAT payable). This represents no significant change to our overall estimate for the approved route, as set out in our report to the Secretary of State on 17 October 2013. Both estimates take account of the formula used to calculate Natural England’s contribution to the maintenance of other National Trails.

## Commentary on Maps

### Section Details – VR1- Map 2: Esson’s Gully to St Audries Bay

Notes on table:

Column 2 – an asterisk (\*) against the route section number means see also table: Other options considered.

Column 5 – ‘Yes – normal’ means roll-back approach is likely to follow the current feature (e.g. cliff edge/beach) for the foreseeable future.

1	2	3	4	5	6a	6b	7
Map(s)	Route section number(s)	Current status of this section	Current surface of this section	Roll-back proposed?	Landward boundary of margin (See maps)	Reason for landward boundary discretion	Proposed exclusions or restrictions
VR1- Map 2	BDM-VR1-S003 – BDM-VR1 – S008*	Not an existing walked route	Grass	Yes – normal	Landward edge of trail	Not used	N/A

### Other options considered: VR1- Map 2: Esson’s Gully to St Audries Bay

Map(s)	Section numbers(s)	Option(s) considered	Reasons for not proposing this option as the route
VR1- Map 2	BDM-VR1-S003 to BDM-VR1-S008	We considered keeping the approved line of the trail that descends the cliff on to the beach at Esson’s Gully, however this would have involved the erection of steps	<p>The erection of steps at Esson’s Gully would cause considerable cost to the public purse c.£145,000.</p> <p>The owner and tenant agree with the proposed variation.</p> <p>The proposed variation would have the added advantage of reducing the amount of trail that becomes impassable at high tide and would improve the underfoot conditions for the access user.</p>

## Formal Proposals

- Below are our formal proposals to the Secretary of State for the variation to the approved route proposed in this report.
- They should be read in conjunction with the relevant maps (VR1- Map 2).
- The commentary above explains the practical effect of these proposals.

## Formal Proposals – Esson’s Gully to St Audries Bay

### Proposed route of the trail

In relation to route sections BDM-VR1-S003 to BDM-VR1-S008, the route, as initially determined at the time the report was prepared, is to be at the centre of the line shown on map VR1- Map 2 as the proposed route of the trail.

If at any time any part of a route section listed in the previous paragraph needs, in Natural England’s view, to change as a result of coastal erosion or other geomorphological processes or encroachment by the sea, in order for the overall route to remain viable, the new route for the part in question will be determined by Natural England without further reference to the Secretary of State. It will include prior discussion with the landowner and occupier about the best new route for the trail.

If this happens, the new route will become the approved route for that section for the purposes of the Order which determines where coastal access rights apply.

### Landward boundary of coastal margin

There are no such proposals in relation to the length of coast shown on VR1- Map 2.

### Local restrictions and exclusions

At the time of writing this report, there are no proposals for local restrictions or exclusions in relation to this length of coast.

### Alternative routes

There are no proposals for alternative routes in relation to this length of coast.

**Enquiries about the proposals should be addressed to:**

Coastal Access Delivery Team – Somerset, Avon and Dorset

**Natural England**

Temple Quay House

2 The Square

Bristol BS1 6DG

Telephone: 0300 060 3900

Email: [westcoastalaccess@naturalengland.org.uk](mailto:westcoastalaccess@naturalengland.org.uk)



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