Part 3.1: Introduction

<table>
<thead>
<tr>
<th>Start Point:</th>
<th>Denton (Grid reference 566404 174165)</th>
</tr>
</thead>
<tbody>
<tr>
<td>End Point:</td>
<td>Botany Marshes (Grid reference 561306 175289)</td>
</tr>
<tr>
<td>Relevant Maps:</td>
<td>GWO 3a to GWO 3d</td>
</tr>
</tbody>
</table>

3.1.1 This is one of a series of linked but legally separate reports published by Natural England under section 51 of the National Parks and Access to the Countryside Act 1949, which make proposals to the Secretary of State for improved public access along and to this stretch of coast between Grain and Woolwich.

3.1.2 This report covers length GWO 3 of the stretch, which is the coast between Grain and Woolwich. It makes free-standing statutory proposals for this part of the stretch, and seeks approval for them by the Secretary of State in their own right under section 52 of the National Parks and Access to the Countryside Act 1949.

3.1.3 The report explains how we propose to implement the England Coast Path (“the trail”) on this part of the stretch, and details the likely consequences in terms of the wider ‘Coastal Margin’ that will be created if our proposals are approved by the Secretary of State. Our report also sets out:

- any proposals we think are necessary for restricting or excluding coastal access rights to address particular issues, in line with the powers in the legislation; and
- any proposed powers for the trail to be capable of being relocated on particular sections (“roll-back”), if this proves necessary in the future because of coastal change.

3.1.4 There is also a single Overview document for the whole of this stretch of coast, explaining common principles and background. This and the other individual reports relating to the stretch should be read in conjunction with the Overview. The Overview explains, among other things, how we have considered any potential environmental impacts of improving public access to this part of the coast, and this report, and other separately published assessments we refer to, then provides more detail on these aspects where appropriate.
Part 3.2: Proposals Narrative

The trail:

3.2.1 Generally follows existing walked routes, including public rights of way, along most of this length.

3.2.2 In some areas (GWO-3-S001 to GWO-3-S009, GWO-3-S014 to GWO-3-S021, GWO-3-S033 to GWO-3-S039, GWO-3-S046 to GWO-3-S048, GWO-3-S052 to GWO-3-S057 and GWO-3-S059 to GWO-3-S067) a significant inland diversion is necessary to take the trail past riverside industrial units, offices and residential areas

3.2.3 From GWO-3-S001 to GWO-3-S021, the route follows the existing Saxon Shore Way long distance trail but departs from it between GWO-3-S022 and GWO-3-S025 in order to align closer to the coast and benefit from better sea views.

Protection of the environment:

3.2.4 The following designated sites affect this length of coast (See Overview Maps D):

- New Tavern Fort, Gravesend Scheduled Monument (SM)
- Gravesend Blockhouse SM
- Aspdin’s Kiln SM, Northfleet

3.2.5 We consider that the coastal environment along this length of coast is unlikely to be sensitive to the improvements to coastal access envisaged and that no special measures are needed in respect of our proposals.

3.2.6 Natural England is satisfied that the proposals for coastal access in this report are made in accordance with relevant environmental protection legislation. In respect of the cultural environment, we have taken advice from Historic England and others before confirming this conclusion.

Part 6b of the Overview includes some contextual information about protecting the environment along this length of coast.

Accessibility:

3.2.7 There are few artificial barriers to accessibility on the proposed route. However, the natural coastal terrain is often challenging for people with reduced mobility and this is the case on sections of our proposed route because:

- There are places where it would be necessary to ascend/descend steps.
- The route follows a narrow alleyway at GWO-3-S004 in Milton (Map 3a) which is also a shared cycleway which may be restricting for wheelchair users.

3.2.8 At the proposed residential development site, Northfleet Embankment West, (Map GWO 3d), the existing pedestrian gates are heavy and difficult to open so will now be locked open to a new post, so as to make them easier to pass. We envisage this happening as part of the physical establishment work described below.

See part 6a of the Overview - ‘Recreational issues’ - for more information.
Where we have proposed exercising statutory discretions:

3.2.9 **Estuary:** This report proposes that the trail should contain sections aligned on the estuary of the River Thames and its tributaries, extending upstream from the open coast. Natural England proposes to exercise its functions as if the sea included the estuarial waters of that river as far as the Woolwich Foot Tunnel in the Royal Borough of Greenwich, as indicated by the extent of the trail shown on map GWO 6h.

See part 5 of the Overview for a detailed analysis of the options considered for this estuary and our resulting proposals.

3.2.10 **Landward boundary of the coastal margin:** We have used our discretion on some sections of the route to map the landward extent of the coastal margin to an adjacent physical boundary such as a fence line, pavement or promenade edge to make the extent of the new access rights clearer. See Table 3.3.1 below.

3.2.11 The Proposals Tables show where we are proposing to alter the default landward boundary of the coastal margin. These proposals are set out in columns 5b and 5c of table 3.3.1. Where these columns are left blank, we are making no such proposals, so the default landward boundary applies. See the note relating to Columns 5b & 5c (above Table 3.3.1) explaining what this means in practice.

See also part 3 of the Overview - ‘Understanding the proposals and accompanying maps’, for a more detailed 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.

3.2.12 **Restrictions and/or exclusions:** We have proposed to exclude access by direction under the Countryside and Rights of Way Act (2000) in certain places along this section of coast.

*Exclusion of access to the saltmarsh/flat between Denton and Botany Marshes.*

3.2.13 Access to the mudflat and saltmarsh in the coastal margin seaward of route sections GWO-3-S001 to GWO-3-S067 is to be excluded all year-round by direction under s25A the Countryside and Rights of Way Act (2000) as it is unsuitable for public access. The exclusion does not affect the route itself and will have no legal effect on land where coastal access rights do not apply. See Directions Maps GWO 3A and 3B

3.2.14 The mudflat in this area is soft and sinking. It does not provide a safe walking surface and is subject to frequent tidal inundation. RNLI and Coastguard data indicates incidents of people being rescued from the mud.

*Cement works operations at Northfleet Embankment West*

3.2.15 Access is to be excluded by direction to the coastal margin all year round at Northfleet Embankment West, adjacent to route sections GWO-3-S060 to GWO-3-S065 under s24 (land management) of the Countryside and Rights of Way Act (2000) in order to prevent disruption to ongoing commercial activity (cement works operations), and under s25(1)(b) of the Countryside and Rights of Way Act (2000) for the purposes of ensuring public safety. This exclusion will not affect the route itself and will have no legal effect on land where coastal access rights do not apply. See Directions Map GWO 3B.

3.2.16 Part of the commercial activity of the site involves frequent HGV traffic associated with wharf operations. The proposed England Coast Path is aligned through the middle of this working site. Preventing public access to the coastal margin is necessary to avoid danger to the public from vehicles and heavy machinery, and to prevent disruption to work operations.
3.2.17 These directions will not prevent or affect:

- any existing local use of the land by right: such use is not covered by coastal access rights;
- any other use people already make of the land locally by formal agreement with the landowner, or by informal permission or traditional toleration; or
- use of any registered rights of common or any rights at common law or by Royal Charter etc.

Any such use is not prohibited or limited by these arrangements.

3.2.18 The directions we give under S25A are intended to avoid any new public rights being created over the area in question in view of the hidden dangers of the mudflats and salt marsh and local tidal patterns to which new users of the land would be unfamiliar.

See part 8 of the Overview - ‘Restrictions and exclusions’ - for a summary for the entire stretch.

3.2.19 **Coastal erosion:** Natural England is able to propose that the route of the trail would be able to change in the future, without further approval from the Secretary of State, in response to coastal change. We have chosen not to make any such proposal in this report. Accordingly the route is to be at the centre of the line shown on maps GWO 3a to GWO 3d as the proposed route of the trail.

Natural England may only propose the use of this roll-back power:

- as a result of coastal erosion or other geomorphological processes or encroachment by the sea, or
- in order to link with other parts of the route that need to roll back in direct response to such changes.

Other future change:

3.2.20 At the time of preparing the report, we foresee the need for changes to the access provisions at the Canal Basin in Gravesend (Map GWO 3a), Clifton Slipways (Map GWO 3b) and Northfleet Embankment West (Map GWO 3d) when these sites are re-developed for housing, potentially within the next 10 years. Development here is likely to affect the proposed trail, however there may be opportunities, as part of the new development, to align the trail closer to the coast, with views of the sea.

3.2.21 We also foresee that at Northfleet Embankment West site (Map GWO 3d) minor changes in the proposed access arrangements may be required in the near future over a number of years, to accommodate increased HGV traffic associated with wharf activities. A minor diversion is likely to be required to ensure a safe passage for visitors once this development is operational. In the longer term, there will be an opportunity to align the trail closer to the coast as this area is to be fully re-developed.

See parts 7 - ‘Future changes’ of the Overview for more information.
Establishment of the trail:

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

Establishment works will only start on this length of coast once these proposals have been approved by the Secretary of State. The works may therefore either precede or follow the start of establishment works on other lengths of coast within the stretch, and detailed in their separate reports.

3.2.23 Our estimate of the capital costs for physical establishment of the trail on the proposed route is £5928 and is informed by:

- information already held by the access authority, Kent County Council, in relation to the management of the existing public rights of way;
- the conclusions of our deliberations in relation to potential impacts on the environment; and
- information gathered while visiting affected land and talking to the people who own and manage it about the options for the route.

3.2.24 There is one main element to the overall cost:

- New Signs: A number of new signs would be needed on the trail, particularly to ensure that the route is well waymarked in the urban areas.

The surfaces and access furniture of the existing paths and footways on the proposed route are generally of a suitable standard for the trail. Significant items of establishment works are shown on the relevant maps accompanying this report. Table 1 shows our estimate of the capital cost for each of the main elements of physical establishment described above.

**Table 1: Estimate of capital costs**

<table>
<thead>
<tr>
<th>Item</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signs &amp; interpretation</td>
<td>£5,155</td>
</tr>
<tr>
<td>Project management</td>
<td>£773</td>
</tr>
</tbody>
</table>

Total: £5,928 (Exclusive of any VAT payable)

3.2.25 Once the Secretary of State’s decision on our report has been notified, and further to our conversations with land managers during the route planning stage, Kent County Council will liaise with affected land owners and occupiers about relevant aspects of the design, installation and maintenance of the new signs and infrastructure that are needed on their land. Prior to works being carried out on the ground, all necessary permissions, authorisations and consents will be obtained. All such works would conform to the published standards for National Trails and the other criteria described in our Coastal Access Scheme.

Maintenance of the trail:

3.2.26 Because the trail on this length of coast will form part of the National Trail being created around the whole coast of England called the England Coast Path, we envisage that it will be maintained to the same high quality standards as other National Trails in England (see The New Deal; Management of National Trails in England from April 2013: details at Annex A of the Overview).
3.2.27 We estimate that the annual cost to maintain the trail will be £1011 (exclusive of any VAT payable). In developing this estimate we have taken account of the formula used to calculate Natural England’s contribution to the maintenance of other National Trails.
### Part 3.3: Proposals Tables

See Part 3 of Overview for guidance on reading and understanding the tables below.

#### 3.3.1 Section Details – Maps GWO 3a to GWO 3d: Denton to Botany Marshes

**Key notes on table:**

1. Column 2 – an asterisk (*) against the route section number means see also table 3.3.2: Other options considered.

2. Column 4 – ‘No’ means no roll-back is proposed for this route section. ‘Yes – normal’ means roll-back is proposed and is likely to follow the current feature (e.g. cliff edge/beach) for the foreseeable future as any coastal change occurs.

3. Column 5a - Certain coastal land types are included automatically in the coastal margin where they fall landward of the trail if they touch it at some point. The relevant land type (foreshore, cliff, bank, barrier, dune, beach, flat or section 15 land – see Glossary) is shown in this column where appropriate. “No” means none present on this route section.

4. Columns 5b and 5c – Any entry in these columns means we are proposing to align the landward boundary of the coastal margin on this route section with the physical feature(s) shown in 5b, for the reason in 5c. No text here means that for this route section the landward edge of the margin would be that of the trail itself - or if any default coastal land type is shown in 5a, that would be its landward boundary instead.

<table>
<thead>
<tr>
<th>Maps</th>
<th>Route section numbers</th>
<th>Current status of route section(s)</th>
<th>Roll-back proposed? (See Part 7 of Overview)</th>
<th>Landward margin contains coastal land type?</th>
<th>Proposal to specify landward boundary of margin (See maps)</th>
<th>Reason for landward boundary proposal</th>
<th>Explanatory notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>GWO 3a</td>
<td>GWO-3-S001* to GWO-3-S003*</td>
<td>Public footpath</td>
<td>No</td>
<td>No</td>
<td>Pavement edge</td>
<td>Clarity and cohesion</td>
<td></td>
</tr>
<tr>
<td>GWO 3a</td>
<td>GWO-3-S004*</td>
<td>Cycle track (pedestrian)</td>
<td>No</td>
<td>No</td>
<td>Fence line</td>
<td>Clarity and cohesion</td>
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<tr>
<td>GWO 3a</td>
<td>GWO-3-S005* to GWO-3-S009*</td>
<td>Restricted byway</td>
<td>No</td>
<td>No</td>
<td>Road edge</td>
<td>Clarity and cohesion</td>
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<tr>
<td>GWO 3a</td>
<td>GWO-3-S010 and GWO-3-S011</td>
<td>Public footway (pavement)</td>
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<td>No</td>
<td>Pavement edge</td>
<td>Clarity and cohesion</td>
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<tr>
<td>GWO 3a</td>
<td>GWO-3-S012 and GWO-3-S013*</td>
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<td>No</td>
<td>Path edge</td>
<td>Clarity and cohesion</td>
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<tr>
<td>GWO 3b</td>
<td>GWO-3-S014</td>
<td>Cycle track (pedestrian)</td>
<td>No</td>
<td>No</td>
<td>Road edge</td>
<td>Clarity and cohesion</td>
<td></td>
</tr>
<tr>
<td>Maps</td>
<td>Route section numbers</td>
<td>Current status of route section(s)</td>
<td>Roll-back proposed? (See Part 7 of Overview)</td>
<td>Landward margin contains coastal land type?</td>
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<tr>
<td>GWO 3b</td>
<td>GWO-3-S015 to GWO-3-S021*</td>
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<td>Pavement edge</td>
<td>Clarity and cohesion</td>
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<td>GWO 3b</td>
<td>GWO-3-S022*</td>
<td>Other existing walked route</td>
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<td>Promenade edge</td>
<td>Clarity and cohesion</td>
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<tr>
<td>GWO 3b</td>
<td>GWO-3-S023* to GWO-3-S025*</td>
<td>Other existing walked route</td>
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<td>Promenade edge</td>
<td>Clarity and cohesion</td>
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<td>GWO 3b</td>
<td>GWO-3-S026 to GWO-3-S028</td>
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<td>Promenade edge</td>
<td>Clarity and cohesion</td>
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<td>GWO 3b</td>
<td>GWO-3-S029 to GWO-3-S031*</td>
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<td>No</td>
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<td>GWO-3-S032*</td>
<td>Other existing walked route</td>
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<td>GWO-3-S034*</td>
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<td>GWO-3-S035* to GWO-3-S036*</td>
<td>Public footway (pavement)</td>
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<td>No</td>
<td>Pavement edge</td>
<td>Clarity and cohesion</td>
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<td>GWO 3b</td>
<td>GWO-3-S037</td>
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<td>GWO 3b</td>
<td>GWO-3-S038</td>
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<td>Promenade edge</td>
<td>Clarity and cohesion</td>
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<td>Maps</td>
<td>Route section numbers</td>
<td>Current status of route section(s)</td>
<td>Roll-back proposed?</td>
<td>Landward margin contains coastal land type?</td>
<td>Proposal to specify landward boundary of margin (See maps)</td>
<td>Reason for landward boundary proposal</td>
<td>Explanatory notes</td>
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<td>GWO-3-S041* to GWO-3-S042*</td>
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<td>No</td>
<td>Promenade edge</td>
<td>Clarity and cohesion</td>
<td>The various boundary features include the edge of a marked walkway and fence lines</td>
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<td>Promenade edge</td>
<td>Clarity and cohesion</td>
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<td>GWO 3b</td>
<td>GWO-3-S046 to GWO-3-S048</td>
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<td>Clarity and cohesion</td>
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<td>GWO 3c</td>
<td>GWO-3-S049 to GWO-3-S050</td>
<td>Public footway (pavement)</td>
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<td>GWO 3c</td>
<td>GWO-3-S051 and GWO-3-S052</td>
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<td>No</td>
<td>No</td>
<td>Fence line</td>
<td>Clarity and cohesion</td>
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<tr>
<td>GWO 3c</td>
<td>GWO-3-S053 to GWO-3-S056</td>
<td>Public footway (pavement)</td>
<td>No</td>
<td>No</td>
<td>Pavement edge</td>
<td>Clarity and cohesion</td>
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<tr>
<td>GWO 3c</td>
<td>GWO-3-S057</td>
<td>Public Highway</td>
<td>No</td>
<td>No</td>
<td>Road edge</td>
<td>Clarity and cohesion</td>
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<td>GWO 3c</td>
<td>GWO-3-S058</td>
<td>Other existing walked route</td>
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<td>No</td>
<td>Fence line</td>
<td>Clarity and cohesion</td>
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<td>GWO 3c</td>
<td>GWO-3-S059 to GWO-3-S060</td>
<td>Public footpath</td>
<td>No</td>
<td>No</td>
<td>Various</td>
<td>Clarity and cohesion</td>
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<tr>
<td>GWO 3d</td>
<td>GWO-3-S061 to GWO-3-S062</td>
<td>Other existing walked route</td>
<td>No</td>
<td>No</td>
<td>Various</td>
<td>Clarity and cohesion</td>
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</table>
### 3.3.2 Other options considered: Maps GWO 3a to GWO 3d: Denton to Botany Marshes

<table>
<thead>
<tr>
<th>Map(s)</th>
<th>Route section numbers(s)</th>
<th>Other option(s) considered</th>
<th>Reasons for not proposing this option</th>
</tr>
</thead>
</table>
| GWO 3a | GWO-3-S001 to GWO-3-S009 | We considered aligning the trail inland along the pavement of Norfolk Road and Canal Road in order to avoid the “Canal Basin” area which includes a narrow stretch of alleyway, with poor visibility. | We opted for the proposed route because:  
- it is closer to the sea and avoids a lengthy inland diversion along a very busy industrial road  
- we are proposing to improve the alleyway by removing scrub to provide a more open feel and increased visibility  
- it follows the existing long distance promoted trail, the Saxon Shore Way  
- the Canal Basin area is due for re-development so we anticipate this area will improve in the future  
- we concluded that overall the proposed route struck the best balance in terms of the criteria described in chapter 4 of the Coastal Access Scheme |
<table>
<thead>
<tr>
<th>Map(s)</th>
<th>Route section numbers(s)</th>
<th>Other option(s) considered</th>
<th>Reasons for not proposing this option</th>
</tr>
</thead>
</table>
| GWO 3a | GWO-3-S013               | We considered aligning the trail seaward of the Rowing Club in Riverside Leisure Area (west of Gordon Promenade) to be closer to the coast and provide better sea views | We opted for the proposed route because:  
  - it avoids a very steep path which would have been difficult for those with reduced mobility or wheelchair users to navigate safely  
  - it aligns by the Riverside Leisure Area, which is considered to be Gravesham’s premier open space, with a car park and visitor facilities  
  - it follows the alignment of the long distance promoted trail, the Saxon Shore Way  
  - we concluded that overall the proposed route struck the best balance in terms of the criteria described in chapter 4 of the Coastal Access Scheme |
| GWO 3b | GWO-3-S021 to GWO-3-S025 | We considered aligning the trail to coincide with the Saxon Shore Way along Crooked Lane. | We opted for the proposed route because:  
  - it is closer to the sea with good sea views  
  - it avoids an inland diversion  
  - it is an existing walked route, well used locally and the proposal is fully supported by the local authority and access authority  
  - we concluded that overall the proposed route struck the best balance in terms of the criteria described in chapter 4 of the Coastal Access Scheme |
| GWO 3b | GWO-3-S032 to GWO-3-S036 | To extend the route along the riverside walkway, we considered aligning the trail through Russell Quay residential area (Map 3b) and onto the southern pavement of West Street. | We opted for the proposed route because:  
  - it provides a safe, existing crossing point over the busy West Street. A route through the residential area would have necessitated a new pedestrian road crossing on West Street, which was considered unsuitable by the local highways authority on this section of road.  
  - we concluded that overall the proposed route struck the best balance in terms of the criteria described in chapter 4 of the Coastal Access Scheme |
<table>
<thead>
<tr>
<th>Map(s)</th>
<th>Route section numbers(s)</th>
<th>Other option(s) considered</th>
<th>Reasons for not proposing this option</th>
</tr>
</thead>
</table>
| GWO 3b | GWO-3-S041 to GWO-3-S042 | We considered removing a section of the wall to avoid a small inland diversion. | We opted for the proposed route because:  
- the removal of the wall would only save a 45 metre walk, and would not add to the enjoyment of the coast in this location as there are no coastal views due to the height of the seawall  
- there could be difficulties in removing this section of wall without affecting the integrity of the seawall which it is attached to, and disturbing underground utilities.  
- we concluded that overall the proposed route struck the best balance in terms of the criteria described in chapter 4 of the Coastal Access Scheme |
| GWO 3d | GWO-3-S067 | We considered aligning the trail on the public footpath that runs seaward of the proposed trail. | We opted for the proposed route because:  
- it is more convenient and safer as the public footpath is situated along a road frequently used by HGVs  
- we concluded that overall the proposed route struck the best balance in terms of the criteria described in chapter 4 of the Coastal Access Scheme |

Note: Any public rights of way not forming part of the proposed trail would remain available for people to use under their pre-existing rights.
### Part 3.4: Proposals Maps

#### 3.4.1 Map Index

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Map GWO 3b: Gravesend to Rosherville

PROPOSALS
- Trail using existing public right of way or highway
- Trail using other existing walked route
- Trail shown on other maps
- Coastal margin landward of the trail

Trail sections which follow existing public rights of way or highways are indicated by a suffix:
- RD - Public road
- CP - Cycle track: Pedestrian
- FP - Public footpath
- FW - Public footway (Pavement)

Other information
- Sea below mean low water
- Other access rights and routes
- National Cycle Route
- Trail infrastructure
- Existing steps to be retained

Explanatory note: coastal margin
Part 3 of the Overview to the report explains where the landward boundary of the coastal margin falls by default. Our proposals include any suggested variation of this default boundary. The purple wash on the map indicates where as a result of our proposals the coastal margin would extend significantly to the landward side of the proposed route of the trail. The coastal margin may include some areas where coastal access rights do not apply, either seaward or landward of the proposed route of the trail. The Overview explains more about this. The landward boundary of the coastal margin may in due course move inland, if the trail rolls back under proposals in this report to respond to coastal change.
Explanatory note: coastal margin

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Directions Map GWO 3A

These directions only affect land where coastal access rights apply and will not affect existing rights of access, such as on public rights of way.

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Directions Map GWO 3B

These directions only affect land where coastal access rights apply and will not affect existing rights of access, such as on public rights of way.