England Coast Path Stretch: Combe Martin to Marsland Mouth



Report CMM 3: Woolacombe to Cock Rock, Croyde

Part 3.1: Introduction

Start Point:	Woolacombe (Grid reference SS 4575 4356)
End Point:	Cock Rock, Croyde (Grid reference SS 4341 3874)
Relevant Maps:	CMM 3a to CMM 3e

- 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 Combe Martin and Marsland Mouth.
- 3.1.2 This report covers length CMM 3 of the stretch, which is the coast between Woolacombe and Cock Rock, Croyde. 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 Follows the existing South West Coast Path as currently walked and managed along all of this length. See maps CMM 3a to CMM 3e and table 3.3.1 below for more details.
- 3.2.2 Generally follows the coastline quite closely and maintains good views of the sea.
- 3.2.3 Is aligned on the beach or foreshore at Croyde Burrows and dunes. See map CMM 3e and table 3.3.1 for details.

The South West Coast Path

3.2.4 The South West Coast Path follows the coast over this length and we propose adopting the walked line of this route as the line of the England Coast Path. There are places where the walked line differs slightly from the route originally approved by the Secretary of State, as the path has evolved over time to cope with coastal erosion and other processes. As explained at part 6a of the Overview, assuming these proposals are approved, we intend to use a separate variation report to the Secretary of State to change the route of the existing national trail to reflect the approved line of the England Coast Path insofar as the two are different.

Protection of the environment:

In this part of the report, we explain how we have taken account of environmental protection objectives in developing our proposals for improved coastal access.

- 3.2.5 The following designated sites affect this length of coast:
 - Mill Rock Site of Special Scientific Interest (SSSI)
 - Saunton to Baggy Point Coast SSSI
 - Bideford to Foreland Point Marine Conservation Zone (MCZ)
 - North Devon Area of Outstanding Natural Beauty (AONB)
 - North Devon Heritage Coast
 - North Devon Biosphere Reserve

Maps C and D in the Overview show the extent of designated areas along this stretch of coast.

- 3.2.6 We consider that the coastal environment, including features of the sites listed above, 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.
- 3.2.7 Natural England is satisfied that the proposals for coastal access in this report are made in accordance with relevant environmental protection legislation. For more information about how we came to this conclusion in respect of the natural environment; see the following assessments of the access proposals that we have published separately:
 - A Habitats Regulations Assessment relating to any potential impact on the conservation objectives of European sites.
- 2 England Coast Path | Combe Martin to Marsland Mouth | CMM3: Woolacombe to Cock Rock, Croyde

 Our Nature Conservation Assessment, in which we document our conclusions in relation to other potential impacts on nature conservation.

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

Accessibility:

- 3.2.8 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:
 - The trail would in places follow an uneven grass or bare soil path along the cliff tops;
 - The trail is undulating, exposed and narrow in places with steep slopes;
 - The trail follows a sand-based path along the beach at Croyde Burrows (map CMM 3e, route sections CMM-3-S029 to CMM-3-S030 & CMM-3-S032);
 - The trail follows the side of the stream crossing the beach at Croyde Sand (map CMM 3e, route section CMM-3-S030 (as the course of the stream varies from day to day, the path can often be cut off);
 - The trail follows a rocky and occasionally slippery section below Cock Rock (map CMM 3e, route section CMM-3-S031);
 - There are places where it would be necessary to ascend/descend steps, for example at Cock Rock/Down End (map CMM 3e, route section CMM-3-S033).
 - The stream-side path, rocky/slippery section and steps between route sections CMM-3-S030 to CMM-3-S033 (map CMM 3e) can be avoided by using the optional alternative route as described in section 3.2.13. below.

See part 6a of the Overview - 'Recreational issues' - for more information.

Where we have proposed exercising statutory discretions:

- 3.2.9 **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 track to make the extent of the new access rights clearer. See Table 3.3.1 below.
- 3.2.10 At Woolacombe Warren (maps CMM 3a and b) and Cox Cliff/Baggy Point (maps CMM 3c and d), we have used our discretion to propose the inclusion of additional, more extensive landward areas within the coastal margin, to secure or enhance public enjoyment of this part of the coast. The owners of this land are content for us to propose this.
- 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 **Optional alternative routes:** An optional alternative route is to operate as an optional diversion from the ordinary route between the junctions of route section numbers CMM-3-S029 & CMM-3-S030 and route section CMM-3-S033 when it is subject to exceptionally high tides. The optional alternative route is to be at the centre of the line shown as route section numbers CMM-3-A001 and CMM-3-A018 on map CMM 3e. It would not have the effect of creating any additional spreading room on either the seaward or the landward side.
- 3.2.13 By default, an optional alternative route covers the land two metres either side of the approved line. However, by virtue of s55D(2) of the National Parks and Access to the Countryside Act 1949, where the optional alternative route follows an existing path corridor, we may propose that the trail should adopt a variable width as dictated by the existing physical features on either side. Columns 5a and 5b of this table describe the boundaries of the alternative route strips on any route sections where we have proposed use of this discretion in order to clarify the extent of the access strip.
- 3.2.14 **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. This would happen in accordance with the criteria and procedures for 'roll-back' set out in part 7 of the Overview.

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.
- 3.2.15 Column 3 of table 3.3.1 and column 4 of table 3.3.2 indicate where roll-back has been proposed in relation to a route section. Where this is the case, the route, as initially determined at the time the report was prepared, is to be at the centre of the line shown on maps CMM 3a to CMM 3e as the proposed route of the trail.
- 3.2.16 If at any time in the future any part of a route section upon which roll-back has been specified needs, in Natural England's view, to change 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. This will be done in accordance with the criteria and procedures described under the title 'Roll-back' in part 7 of the Overview and section 4.10 of the Coastal Access Scheme. 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.

On sections for which roll-back is <u>not</u> proposed in tables 3.3.1 and 3.3.2, the route is to be at the centre of the line shown on maps CMM 3a to CMM 3e as the proposed route of the trail.

Other future change:

3.2.17 At this point we do not foresee any need for future changes to the access provisions that we have proposed within this report.

See parts 7 - 'Future changes' of the Overview for more information.

Establishment of the trail:

3.2.18 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.

3.2.19 Our estimate of the capital costs for physical establishment of the trail on the proposed route is £3,105 and is informed by:

- information already held by the access authority, Devon County Council, in relation to the management of the existing South West Coast Path;
- 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.
- 3.2.20 There is one main element to the overall cost:
 - New signs The optional alternative route will need sign-posting. New 'Coast Path' signs are proposed in key locations, at Putsborough Sands (map CMM 3b) and Croyde (map CMM 3e). These will show coastal destinations further afield than the next headland/village. Any signs and information boards with outdated information about the existing route of the South West Coast Path would require replacement.

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

Item	Cost
Signs & interpretation	£2,700
Project management	£405

Total £3,105 (Exclusive of any VAT payable)

3.2.21 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, Devon 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:

- 3.2.22 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).
- 3.2.23 We estimate that the annual cost to maintain the trail will be £4,522 (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 Details for sections that follow the existing South West Coast Path - Maps CMM 3a to CMM 3e: Woolacombe to Cock Rock, Croyde

Key notes on table:

- Column 2 an asterisk (*) against the route section number means see also table 3.3.3: Other options considered.
- 2. Column 3 '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 3 'Yes see table 3.3.4' means roll-back is proposed, but refer to that table below about our likely approach to implementing it for this route section. This is because a more complex situation exists in this case and consideration must be given to how roll-back may happen in relation to excepted land, a protected site etc.
- 4. Column 4a 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.
- 5. Columns 4b and 4c 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 4b, for the reason in 4c. 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 4a, that would be its landward boundary instead.

1	2	3	4a	4b	4c	5
Map(s)	Route section number(s)	Roll-back proposed? (See Part 7 of Overview)	Landward margin contains coastal land type?	Proposal to specify landward boundary of margin (See maps)	Reason for landward boundary proposal	Explanatory notes
СММ За	CMM-3- S001	No	No	Pavement edge	Clarity and cohesion	
	CMM-3- S002 to CMM-3- S004	Yes - Normal	No	Hedge bank	Additional landward area	
CMM 3b	CMM-3- S005	Yes - Normal	No	Hedge bank	Additional landward area	
	CMM-3- S006*	No	No	Fence line	Additional landward area	
	CMM-3- S007*	No	No	Fence line	Clarity and cohesion	

1	2	3	4a	4b	4c	5
Map(s)	Route section number(s)	Roll-back proposed? (See Part 7 of Overview)	Landward margin contains coastal land type?	Proposal to specify landward boundary of margin (See maps)	Reason for landward boundary proposal	Explanatory notes
	CMM-3- S008*	No	No	Road (landward edge)	Clarity and cohesion	
	CMM-3- S009	No	No	Road (landward edge)	Clarity and cohesion	
CMM 3c	CMM-3- S010*	Yes - Normal	No			
	CMM-3- S011	Yes – see table 3.3.4	No			
	CMM-3- S012	Yes - Normal	No			
	CMM-3- S013	Yes - Normal	No	Hedge bank	Additional landward area	
CMM 3d	CMM-3- S014	Yes – see table 3.3.4	No	Hedge bank	Additional landward area	
	CMM-3- S015	Yes - Normal	No	Wall	Clarity and cohesion	
	CMM-3- S016	Yes - Normal	No	Hedge bank	Clarity and cohesion	
	CMM-3- S017 to CMM-3- S018	Yes – see table 3.3.4	No	Hedge bank	Additional landward area	
	CMM-3- S019 to CMM-3- S020	Yes – see table 3.3.4	No	Path (landward edge)	Clarity and cohesion	
	CMM-3- S021 to CMM-3- S022	Yes - See table 3.3.4	No	Track (landward edge)	Clarity and cohesion	
CMM 3e	CMM-3- S023 to CMM-3- S024	No	No	Track (landward edge)	Clarity and cohesion	
	CMM-3- S025	No	No	Road (landward edge)	Clarity and cohesion	
	CMM-3- S026 to	No	No	Fence line	Clarity and cohesion	

1	2	3	4a	4b	4c	5
Map(s)	Route section number(s)	Roll-back proposed? (See Part 7 of Overview)	Landward margin contains coastal land type?	Proposal to specify landward boundary of margin (See maps)	Reason for landward boundary proposal	Explanatory notes
	CMM-3- S027					
	CMM-3- S028	No	No	Road (landward edge)	Clarity and cohesion	
	CMM-3- S029 to CMM-3- S030	Yes - See table 3.3.4	Sand Dune			
	CMM-3- S031 to CMM-3- S032	Yes - See table 3.3.4	No			
	CMM-3- S033	Yes - See table 3.3.4	No	Steps (landward edge)	Clarity and cohesion	

3.3.2 Alternative routes and optional alternative route details - Map CMM 3e: Middleborough Hill to Cock Rock, Croyde

Notes on table:

- 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.
- 2. Columns 5a and 5b An entry in either or both of these columns denotes a proposal to align the seaward or landward boundary (as the case may be) of this section of the alternative route strip with the physical feature(s) shown. No text in the column means no such proposal, meaning that the edge of the alternative route strip would be at the default width of 2 metres on the relevant side of the route's centre line.

1	2	3	4	5a	5b	6
Map(s)	Route section number(s)	Current status of route section(s)	Roll-back proposed? (See Part 7 of Overview)	Proposal to specify seaward boundary of alternative route strip	Proposal to specify landward boundary of alternative route strip	Explanatory notes
CMM 3e	CMM-3- A001	Public footpath	No	Fence line	Fence line	

1	2	3	4	5a	5b	6
Map(s)	Route section number(s)	Current status of route section(s)	Roll-back proposed? (See Part 7 of Overview)	Proposal to specify seaward boundary of alternative route strip	Proposal to specify landward boundary of alternative route strip	Explanatory notes
	CMM-3- A002	Public footpath	No			
	CMM-3- A003 to CMM-3- A004	Public footpath	No	Fence line	Fence line	
	CMM-3- A005 to CMM-3- A006	Public footpath	No	Track (seaward edge)	Hedge	
	CMM-3- A007	Public footpath	No	Wall	Hedge	
	CMM-3- A008	Public footway (pavement)	No	Wall	Wall	
	CMM-3- A009 to CMM-3- A010	Public highway	No	Wall	Pavement edge	
	CMM-3- A011	Public highway	No			
	CMM-3- A012	Public footway (pavement)	No	Wall	Pavement edge	
	CMM-3- A013	Public highway	No			
	CMM-3- A014	Public footway (pavement)	No	Wall	Pavement edge	
	CMM-3- A015	Public footway (pavement)	No			
	CMM-3- A016	Public footway (pavement)	No	Pavement edge	Wall	
	CMM-3- A017	Public highway	No			
	CMM-3- A018	Public footpath	No	Fence line	Wall	

3.3.3 Other options considered - Maps CMM 3b and CMM 3c: Woolacombe Warren to Cox Cliff

Map(s)	Route section numbers(s)	Other option(s) considered	Reasons for not proposing this option
CMM 3b	CMM-3- \$006 to CMM-3- \$008	We considered aligning the trail along the public footpath where Vention Road meets the track by Broadsands Bungalow (route section CMM-3-S006) and then entering the carpark at Putsborough Sands before rejoining the trail by Cliff Court at route section CMM-3-S008.	 We opted for the proposed route because: The considered route has fewer views of the sea (obscured by trees); it often contains livestock; it is closer to dwellings; it would need to go through a busy carpark at the western end The proposal to retain the existing route is made with the support of the landowner 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
CMM 3c	CMM-3- S010	We considered following the public footpath seaward of the proposed trail at Napps Cliff	 We opted for the proposed route because: The views of the sea from the public footpath are obscured by cliff top trees and other dense vegetation The proposed trail meets current National Trail standards and has good views over the sea 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.

3.3.4 Roll-back implementation – more complex situations: Maps CMM 3c, CMM 3d and CMM 3e: Putsborough to Cock Rock, Croyde.

Map(s)	Route section number(s)	Feature(s) or site(s) potentially affected	Our likely approach to roll-back
CMM 3c	CMM-3- S011 and CMM-3- S014	Saunton to Baggy Point Coast SSSI	If it is no longer possible to find a viable route seaward of the designated site whose designated features are sensitive to public access, or where the existing route already passing through such a site must be altered,

Map(s)	Route section number(s)	Feature(s) or site(s) potentially affected	Our likely approach to roll-back
CMM 3d	CMM-3- S017 to CMM-3- S020		we will choose a new route after detailed discussions with the relevant experts and with any potentially affected owners or occupiers, which will either (a) pass through the site, if appropriate or (b) if necessary, be routed landward of it.
CMM 3e	CMM-3- S029 to CMM-3- S031		necessary, 20 realed fariatival definition
CMM 3d	CMM-3- S021 to CMM-3- S022	Properties below Middleborough Hill landward of the trail	If it is no longer possible to find a viable route seaward of the specified excepted land (the buildings, curtilage and gardens), we will choose a route landward of it, following discussions with owners and occupiers.
CMM 3e	CMM-3- S031 to CMM-3- S033	Properties at Cock	If it is no longer possible to find a viable route seaward of the specified excepted land (the buildings, curtilage and gardens), we will choose a route landward of it, following discussions with owners and occupiers.

In relation to all other sections where roll-back has been proposed, any later adjustment of the trail is likely to follow the current feature (e.g. cliff edge/beach) for the foreseeable future as any coastal change occurs.

Part 3.4: Proposals Maps

3.4.1 Map Index

Map reference	Map title
CMM 3a	Woolacombe to Woolacombe Warren
CMM 3b	Woolacombe Warren to Putsborough
CMM 3c	Putsborough to Cox Cliff
CMM 3d	Cox Cliff to Middleborough Hill
СММ 3е	Middleborough Hill to Cock Rock, Croyde

PROPOSALS

Trail Sections

Trail using existing public right of way or highway

Trail using other existing walked route

Trail not using existing walked route

Alternative route

▼ Trail shown on other maps

Approved or open England Coast Path

Maps that show sections of the trail that follow the existing South West Coast Path as currently walked and managed use the following trail categories. Information on the existing status and infrastructure is not shown.

Trail using existing
South West Coast Path

Alternative or optional alternative route using existing South West Coast Path

Trail sections which follow existing public rights of way or highways are indicated by a suffix:

BW - Public bridleway

BY - Public byway

CP - Cycletrack (pedestrian)

CT - Cycletrack (cycles only)

FP - Public footpath

FW - Public footway (Pavement)

RB - Restricted byway

RD - Public road

Coastal Margin

Explanatory note

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.



Coastal margin landward of the trail



Coastal margin landward of the trail which is existing access land

Other Information

Other access rights and routes

Public bridleways

Public byways

Public footpaths

· – · · · Restricted byways

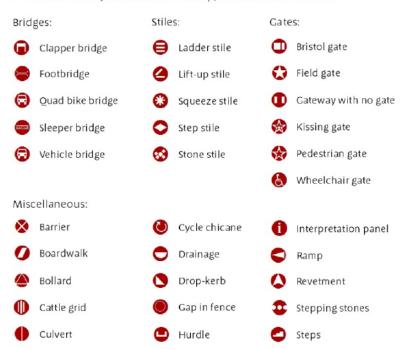
Sustrans national routes

South West Coast Path

Existing access land

Infrastructure types

For status of each, where shown on map, see colour codes below



Infrastructure status

Each symbol shown on the map is colour coded as appropriate, as in this example for a set of steps:

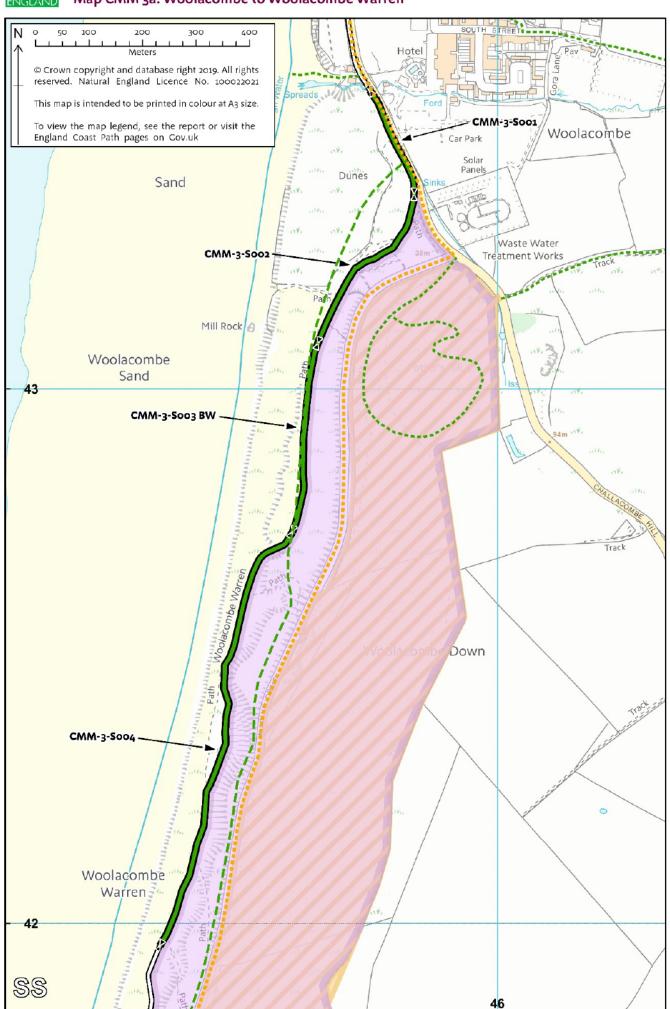
 Existing steps to be retained

New steps required

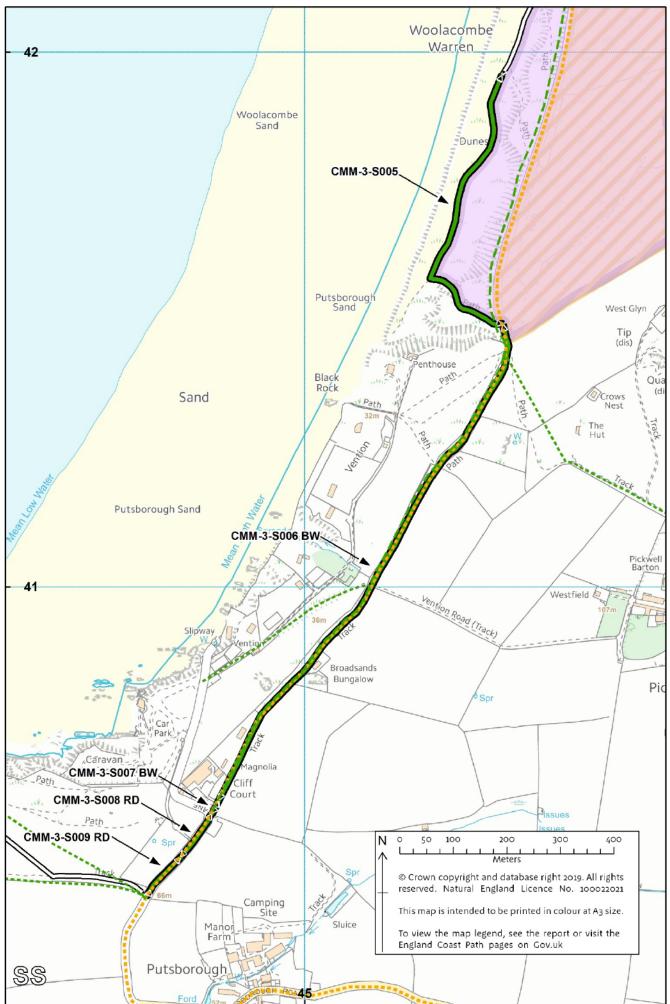
 Existing steps to be removed



Map CMM 3a: Woolacombe to Woolacombe Warren

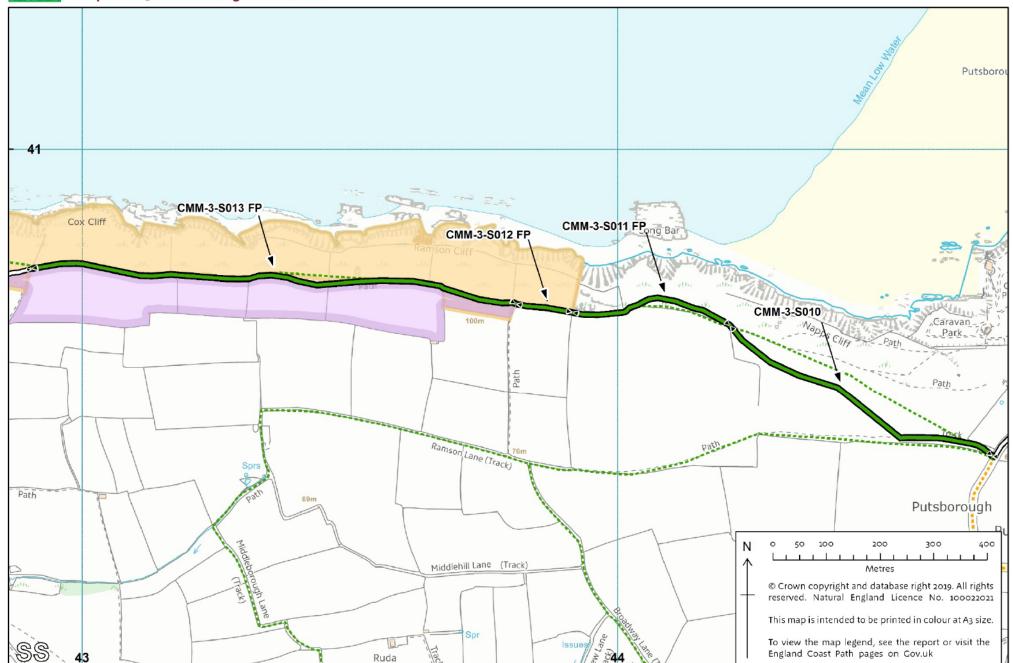






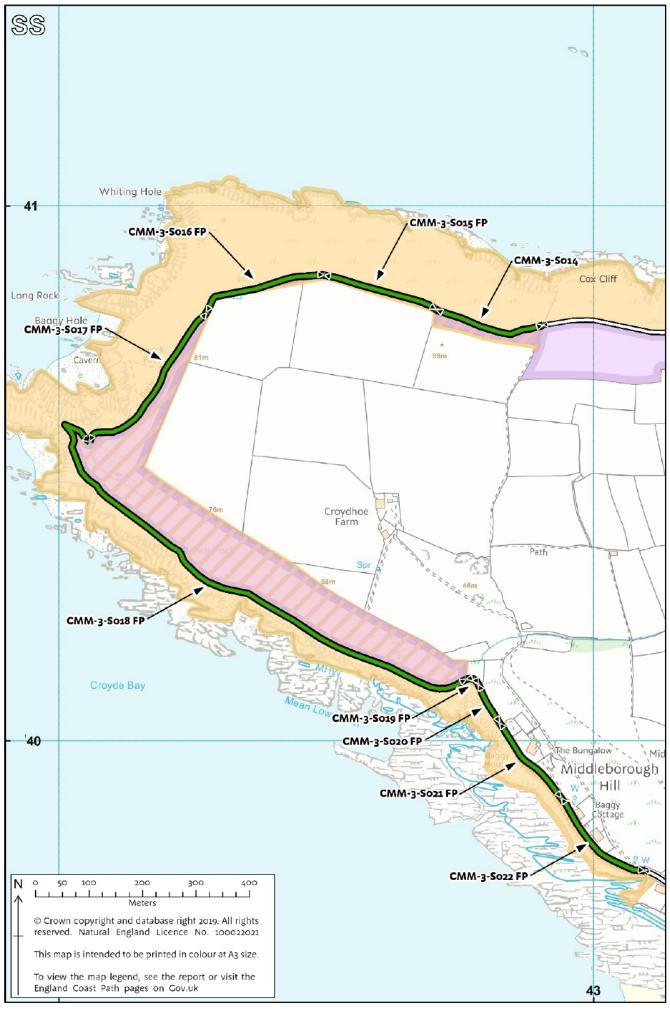


Map CMM 3c: Putsborough to Cox Cliff





Map CMM 3d: Cox Cliff to Middleborough Hill





Coastal Access - Combe Martin to Marsland Mouth - Natural England's Proposals Report Report CMM 3: Woolacombe to Cock Rock, Croyde

Map CMM 3e: Middleborough Hill to Cock Rock, Croyde

