

# Coastal Access – Cremyll to Kingswear lengths CKW2 to CKW4 and CKW6 to CKW8



## Representations with Natural England's comments

January 2021

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### 1. Introduction

This document records the representations Natural England has received on the proposals in length reports CKW2 to CKW4 and CKW6 to CKW8 from persons or bodies. It also sets out any Natural England comments on these representations.

Where representations were made that relate to the entire stretch for Cremyll to Kingswear they are included here in so far as they are relevant to lengths CKW2 to CKW4 and CKW6 to CKW8 only.

### 2. Background

Natural England's compendium of reports setting out its proposals for improved access to the coast from Cremyll to Kingswear, comprising an overview and nine separate length reports, was submitted to the Secretary of State on 15 January 2020. This began an eight-week period during which representations and objections about each constituent report could be made.

In total, Natural England received 25 representations pertaining to length reports CKW2 to CKW4 and CKW6 to CKW8, of which 11 were made by organisations or individuals whose

representations must be sent in full to the Secretary of State in accordance with paragraph 8(1)(a) of Schedule 1A to the National Parks and Access to the Countryside Act 1949. These 'full' representations are reproduced in Section 4 in their entirety, together with Natural England's comments. Also included in Section 4 is a summary of the 14 representations made by other individuals or organisations, referred to as 'other' representations. Section 5 contains the supporting documents referenced against the representations.

### **3. Layout**

The representations and Natural England's comments on them are separated below into the lengths against which they were submitted. Each length below contains the 'full' and 'other' representations submitted against it, together with Natural England's comments. Where representations refer to two or more lengths, they and Natural England's comments will appear in duplicate under each relevant length. Note that although a representation may appear within multiple lengths, Natural England's responses may include length-specific comments which are not duplicated across all lengths in which the representation appears.

### **4. Representations and Natural England's comments on them**

## **Length Report CKW2**

#### ***Full representations***

**Representation number:**

MCA/CKW Stretch/R/1/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

**Other reports within stretch to which this representation also relates:**

CKW3 to CKW9

**Representation in full**

The Devon Countryside Access Forum expects, as part of the implementation process, that signage and waymarking will be clear, especially at points of decision where paths may go in different directions. Signage should reflect the nature of the path and be appropriate to the landscape to avoid sign clutter or urbanisation. Users should be encouraged to have maps available, especially away from residential areas.

**Natural England's comments**

We welcome the positive engagement from Devon Countryside Access Forum (DCAF) during the development of our proposals. As part of the implementation process we, together with the relevant access authority, will ensure that signage is clear and appropriate, particularly at junctions.

**Relevant appended documents (see section 5):**

N/A

**Representation number:**

MCA/CKW Stretch/R/2/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

**Other reports within stretch to which this representation also relates:**

CKW4, CKW5, CKW7, CKW8, CKW9

**Representation in full****Complex roll-back**

The Devon Countryside Access Forum notes the significant number of more complex roll-back locations which have been identified in the reports. There is concern that there is no limit to how far inland roll-back might apply, given excepted land and environmental obligations. The Forum agrees that simple roll-back should take place. The Devon Countryside Access Forum advises that it does not seem appropriate for roll-back to take place in the complex situations cited in the reports. Roll-back does not provide any statutory process for consultation, and could impact on landowners hitherto unaware that their land could be affected.

The Devon Countryside Access Forum advises that it would be more appropriate to publish variation reports in these instances to formally allow landowners and others, such as the DCAF, to make objection or representation.

**Natural England's comments**

In our published Overview document we explain that ordinarily, where roll-back has been proposed and becomes necessary, we would expect the trail to be adjusted to follow the current feature (for example, the cliff edge or top of foreshore). Where we foresee that local circumstances will require more detailed consideration, we provided further information about the situation in the relevant report. We call this 'complex rollback'; such situations may include where the trail can't roll back in the normal way because of an obstruction, excepted land or because of environmental considerations.

We have taken and will continue to take all reasonable steps to discuss implications and options with all parties likely to be affected by such changes, both during the initial planning work that preceded the writing of the reports for each length, and during any future work to plan and implement a 'rolled back' route.

**Relevant appended documents (see section 5):**

N/A

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**Representation number:**

MCA/CKW Stretch/R/3/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

## Other reports within stretch to which this representation also relates:

CKW3 to CKW9

## Representation in full

### Disability access

The Devon Countryside Access Forum is aware that many sections of the coast path include man-made obstacles such as path furniture (stiles, steps and gate design), narrow chicanes or lack of drop kerbs which make access difficult for people with limited mobility. There are other instances where upgrades to path surface, width or drainage could make access easier. The Forum advises that Natural England considers this in implementing the England Coast Path in Devon and works with land managers and other partners to secure improvements. It may be possible to identify particular stretches of path where the gains to access would be most beneficial. While the Forum recognises that issues of topography might make accessing some areas challenging, there are often many simple actions which can be taken to improve access for disabled people.

To give an example, the kerb in this photo (on the existing South West Coast Path) makes access through the gate difficult but could be replaced at modest cost with a ramp.



### Natural England's comments

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Cremyll to Kingswear stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Because of current access restrictions (relating to lockdown restrictions and site visits), it may not be possible to agree specific new projects until the establishment phase of the process.

### Relevant appended documents (see section 5):

5A - MCA/CKW Stretch/R/3/CKW2633 - Devon Countryside Access Forum Disability Access Position Statement 2017

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**Representation number:**

MCA/CKW Stretch/R/4/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

**Other reports within stretch to which this representation also relates:**

CKW3 to CKW9

**Representation in full**

The Devon Countryside Access Forum advises that comprehensive information about ferries and alternative options should be available to assist people undertaking a long-distance walk.

**Natural England's comments**

As part of the implementation process we, together with the access authority and the South West Coast Path Association, will seek to ensure that information about ferries and alternative options will be available to assist people using the coast path and those undertaking long-distance walks. Our reports include an estimate of the capital costs for physical establishment of the new trail and one element of the overall cost for report CKW2 is for a number of new signs and information boards which would be needed on the trail particularly at the start and end points of the alternative route around the Yealm Estuary.

**Relevant appended documents (see section 5):**

N/A

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**Representation number:**

MCA/CKW2/R/2/CKW2660

**Organisation/ person making representation:**

Ramblers Association Devon

**Route section(s) specific to this representation:**

CKW2a to CKW 2f, CKW-2-S066

**Other reports within stretch to which this representation also relates:**

CKW3

**Representation in full**

**Map CKW 2f, section CKW-2-S066** and text at paragraph 2.2.10. We accept the use of the seasonal ferry across the River Yealm as the shortest practicable crossing point of this estuary. However we suggest the operating hours of the ferry should be greater than that suggested in part 5 of the Overview document (that is, more than 10-12am and 3-4pm). A wider hours of operation in the afternoon would be appropriate. Our comments regarding the "alternative route" around the Yealm Estuary are addressed in our representation on report CKW 3.

Text at paragraph/section 2.3.1 With reference to the tabular text in this section 2.3.1, there appears to be some inconsistencies in the column 3 entries indicating whether or not “roll-back” is proposed. It may be because of my lack of full understanding as to how roll-back is determined to be applicable (or not) but I cannot see why roll-back is NOT applicable to some sections which are similar in terrain and land type etc. to other sections where roll-back is proposed. I know this entire stretch of the coast (from Mountbatten to the Yealm Estuary) through walking it regularly over the last 20 – 30 years. The only section where there has been significant coastal erosion in recent years has been at map section CKW-2- S010.

### **Natural England’s comments**

We welcome the positive engagement from Ramblers Association Devon during the development of our proposals.

### **Operation of the River Yealm ferry**

The ferry across the mouth of the Yealm estuary between Warren Cottage and Ferry Wood operates a seasonal service from 1<sup>st</sup> April until 30<sup>th</sup> September and runs every day between 10 am and 4 pm. Service may be restricted to the core hours of 10 am to 12 noon and 3 pm to 4 pm each day, during bad weather or quieter times. The ferry is run as a commercial operation and we judged its availability to be adequate to be designated as the ordinary route. See Part 5 of the Overview document for a detailed analysis of our decision to use the ferry crossing at the Yealm.

We note the point raised by the Ramblers Association that an increase in the hours of operation during the afternoon would have a recreational benefit for walkers. However, as noted above, although the core hours are 10 am to 12 noon and 3 pm to 4 pm, the usual daily service is between 10 am and 4 pm. Increasing the existing hours of operation beyond this is not considered viable and additional funding is not available to provide for an extension to this service. When the ferry is not running an alternative route around the estuary has been proposed.

### **Roll back**

Rollback has been proposed on sections of the trail where evidence suggests that future erosion or other types of coastal change may impact on the line of the coast path (see section 6d of the Cremyll to Kingswear Overview). We use data provided in the South Devon and Dorset Shoreline Management Plan SMP2 and by the Environment Agency to help us identify these sections. In some cases we have identified a possible requirement for roll-back where there are no obvious issues with erosion, to ensure that we can maintain continuity of the trail should a nearby section of the trail be affected by coastal change.

### **Relevant appended documents (see section 5):**

N/A

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### ***Other representations***

#### **Representation ID:**

MCA/CKW2/R/1/CKW2879

#### **Organisation/ person making representation:**

[Redacted]

#### **Name of site:**

N/A

**Report map reference:**

Report CKW2, Maps 2a, 2b, 2c, 2d, 2e, 2f

**Route sections on or adjacent to the land:**

N/A

**Other reports within stretch to which this representation also relates**

N/A

**Summary of representation:**

Request that bridleways are added into the plans to allow off road paths for local riders.

**Natural England's comment:**

Part 9 of the Marine and Coastal Access Act 2009 aims to improve public access to, and enjoyment of, the English coastline by creating clear and consistent public rights along the English coast for open-air recreation on foot. Our proposals do not create any additional rights of access for cyclists or horse-riders above those that already exist.

On some sections of coast, existing rights will apply instead of or as well as the coastal access rights. These may include rights to ride horses or other "higher rights". There is also a mechanism within the legislation that allows owners to remove or relax the national restrictions via a direction. This would allow cycling or horse riding to take place on the stretch of the England Coast Path within their ownership. However to date no owners on this stretch have chosen to do this.

**Relevant appended documents (see Section 6):**

5B - MCA/CKW2/R/1/CKW2879 – Weblink to records of near misses and accidents encountered by horse riders on roads

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**Representation ID:**

MCA/CKW2/R/3/CKW0008

**Organisation/ person making representation:**

The Disabled Ramblers

**Name of site:**

Report CKW 2: Mount Batten Point to Yealm Estuary

**Report map reference:**

- Map CKW 2a Mount Batten Ferry to Jennycliff
- Map CKW 2b Jennycliff to Bovisand Bay
- Map CKW 2c Bovisand Bay to Heybrook Bay
- Map CKW 2d Heybrook Bay to Wembury Point
- Map CKW 2e Wembury Point to Connor's Cove
- Map CKW 2f Connor's Cove to Yealm Estuary

**Route sections on or adjacent to the land:**

Report CKW 2: All route sections generally.

## **Other reports within stretch to which this representation also relates**

N/A

### **Summary of representation:**

Disabled Ramblers has concerns where access furniture along the trail is not of a suitable standard for those who use all-terrain mobility vehicles and pushchairs. Natural England should ensure that any existing or new infrastructure does not present a barrier to their ability to progress along the Coast Path.

Disabled Ramblers requests that Natural England address with the necessary parties involved, the issue of existing man-made structures that are a barrier to those who use mobility vehicles; and ensure that all existing and proposed new structures along the Coast Path are suitable for those who use large mobility vehicles, changing infrastructure as needed, and complying with *British Standard BS5709: 2018 Gaps Gates and Stiles*.

### **Natural England's comment:**

We welcome the positive engagement from the Disabled Ramblers. After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Cremyll to Kingswear stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Any changes to and improvements of furniture included in our reports do not inhibit use by mobility vehicles where the surrounding nature of the route makes this feasible; all new furniture will meet the British Standard 5709:2018 Gaps, Gates and Stiles.

Because of current access restrictions (relating to lockdown restrictions and site visits), it may not be possible to agree specific new projects until the establishment phase of the process.

### **Relevant appended documents (see Section 5):**

5C - MCA/CKW2/R/3/CKW008 - Disabled Ramblers Notes on Infrastructure

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## **Length Report CKW3**

### ***Full representations***

#### **Representation number:**

MCA/CKW Stretch/R/1/CKW2633

#### **Organisation/ person making representation:**

Devon Countryside Access Forum



**Route section(s) specific to this representation:**

CKW stretch

**Other reports within stretch to which this representation also relates:**

CKW3 to CKW9

**Representation in full**

The Devon Countryside Access Forum expects, as part of the implementation process, that signage and waymarking will be clear, especially at points of decision where paths may go in different directions. Signage should reflect the nature of the path and be appropriate to the landscape to avoid sign clutter or urbanisation. Users should be encouraged to have maps available, especially away from residential areas.

**Natural England's comments**

We welcome the positive engagement from Devon Countryside Access Forum (DCAF) during the development of our proposals. As part of the implementation process we, together with the relevant access authority, will ensure that signage is clear and appropriate, particularly at junctions.

**Relevant appended documents (see section 5):**

N/A

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**Representation number:**

MCA/CKW Stretch/R/2/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

**Other reports within stretch to which this representation also relates:**

CKW4, CKW5, CKW7, CKW8, CKW9

**Representation in full****Complex roll-back**

The Devon Countryside Access Forum notes the significant number of more complex roll-back locations which have been identified in the reports. There is concern that there is no limit to how far inland roll-back might apply, given excepted land and environmental obligations. The Forum agrees that simple roll-back should take place. The Devon Countryside Access Forum advises that it does not seem appropriate for roll-back to take place in the complex situations cited in the reports. Roll-back does not provide any statutory process for consultation, and could impact on landowners hitherto unaware that their land could be affected.

The Devon Countryside Access Forum advises that it would be more appropriate to publish variation reports in these instances to formally allow landowners and others, such as the DCAF, to make objection or representation.

**Natural England's comments**

In our published Overview document we explain that ordinarily, where roll-back has been proposed and becomes necessary, we would expect the trail to be adjusted to follow the current feature (for example, the cliff edge or top of foreshore). Where we foresee that local circumstances will require more detailed consideration, we provided further information about the situation in the relevant report. We call this 'complex rollback'; such situations may include where the trail can't roll back in the normal way because of an obstruction, excepted land or because of environmental considerations.

We have taken and will continue to take all reasonable steps to discuss implications and options with all parties likely to be affected by such changes, both during the initial planning work that preceded the writing of the reports for each length, and during any future work to plan and implement a 'rolled back' route.

**Relevant appended documents (see section 5):**

N/A

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**Representation number:**

MCA/CKW Stretch/R/3/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

**Other reports within stretch to which this representation also relates:**

CKW3 to CKW9

**Representation in full**

**Disability access**

The Devon Countryside Access Forum is aware that many sections of the coast path include man-made obstacles such as path furniture (stiles, steps and gate design), narrow chicanes or lack of drop kerbs which make access difficult for people with limited mobility. There are other instances where upgrades to path surface, width or drainage could make access easier. The Forum advises that Natural England considers this in implementing the England Coast Path in Devon and works with land managers and other partners to secure improvements. It may be possible to identify particular stretches of path where the gains to access would be most beneficial. While the Forum recognises that issues of topography might make accessing some areas challenging, there are often many simple actions which can be taken to improve access for disabled people.

To give an example, the kerb in this photo (on the existing South West Coast Path) makes access through the gate difficult but could be replaced at modest cost with a ramp.



### **Natural England's comments**

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Cremyll to Kingswear stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Because of current access restrictions (relating to lockdown restrictions and site visits), it may not be possible to agree specific new projects until the establishment phase of the process.

### **Relevant appended documents (see section 5):**

5A - MCA/CKW Stretch/R/3/CKW2633 - Devon Countryside Access Forum Disability Access Position Statement 2017

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### **Representation number:**

MCA/CKW Stretch/R/4/CKW2633

### **Organisation/ person making representation:**

Devon Countryside Access Forum

### **Route section(s) specific to this representation:**

CKW stretch

### **Other reports within stretch to which this representation also relates:**

CKW3 to CKW9

### **Representation in full**

The Devon Countryside Access Forum advises that comprehensive information about ferries and alternative options should be available to assist people undertaking a long-distance walk.

### **Natural England's comments**

As part of the implementation process we, together with the access authority and the South West Coast Path Association, will seek to ensure that information about ferries and alternative options will be available to assist people using the coast path and those undertaking long-distance walks. Our reports include an estimate of the capital costs for physical establishment of the new trail and one element of the overall cost for report CKW2 is for a number of new signs and information boards which would be needed on the trail particularly at the start and end points of the alternative route around the Yealm Estuary.

### **Relevant appended documents (see section 5):**

N/A

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### **Representation number:**

MCA/CKW3/R/1/CKW2660

### **Organisation/ person making representation:**

Ramblers Association Devon

### **Route section(s) specific to this representation:**

Report CKW 3 The Yealm Estuary

### **Other reports within stretch to which this representation also relates:**

N/A

### **Representation in full**

We comment in broad and general terms on the "alternative route" around the Yealm Estuary as proposed in this report.

When your Coastal Access Approved Scheme was first published a few years ago I was encouraged (as Ramblers Access Officer for Devon) to see the Yealm Estuary as one of the examples of how estuaries might be treated. The wildest dream of a true path or route around that estuary would have been a great achievement. But it is not to be. Clearly the potential high cost, and particularly the lack of appropriate compulsory powers in the Marine and Coastal Access legislation and the probable reluctance of landowners make the remotely achievable an impossible mission.

We do not accept that the alternative route as proposed is one that will be used readily and with any great enthusiasm by anyone walking the coast path and then prevented by continuing further by the non-operation of the Yealm Ferry.

I could suggest alternative routes, nearer the estuary but that would need co-operation and some philanthropy by reluctant land owners if it were ever to be achieved.

### **Natural England's comments**

We welcome the positive engagement from Ramblers Association Devon during the development of our proposals.

In developing our proposals we considered in detail a number of other options for the Yealm Estuary, as set out in section 5g of the Overview document and in table 3.3.2 of report CKW3. Our proposal is for the 'ordinary' route of the England Coast Path to incorporate the ferry crossing and an 'alternative' route will be in place for when the ferry is not running.

The proposed alternative route will make use of existing public highways, an existing walked permissive route and rights of way including parts of the Erme-Plym Trail. It would extend to Wapplewell, Brixton and Yealmpton which are the first public foot crossings over the River Yealm and its tributaries.

We looked at a number of options for the alternative route including: aligning through Wembury Wood and then along a permissive path through Hollacombe Woods; and using the network of lanes nearest the Yealm between the A379, Puslinch Bridge, past Wrescombe and Newton Downs and then down Parsonage Road and Bridgend Hill. The reasons for not proposing these options are set out in table 3.3.2 of report CKW3.

Our proposed alternative route uses those existing walked routes located closest to the estuary, even though in places it is quite a considerable distance from it. However even if the path was close to the estuary in many places the woody vegetation along much of the banks is such that even when only a few metres away from the estuary, the views of it are minimal.

In terms of the Yealm Estuary being included in Natural England's Approved Scheme 2013 (Chapter 11) as an example of how the estuary criteria could be considered, section 11.1 of the Scheme states "The analysis illustrates how the estuary criteria will be applied, but it is not a substitute for the detailed analysis which will take place during the preparation of our proposals to the Secretary of State on each of the estuaries shown. For these reasons, our eventual proposal to the Secretary of State on the estuaries illustrated here may be different from any of the options described."

**Relevant appended documents (see section 5):**

N/A

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**Representation number:**

MCA/CKW3/R/6/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW 3 – Maps CKW 3a (Warren Point to Wembury) through to CKW 3j (Bridgend to Ferry Wood, Noss Mayo).

**Other reports within stretch to which this representation also relates:**

N/A

**Representation in full**

*Yealm Estuary*

The use of the ferry crossing is supported. However, the Devon Countryside Access Forum is disappointed that Natural England has not been able to take the alternative route closer to the estuary. It recommends that Natural England explore the potential of increasing the ferry service, for example at weekends in the winter.

**Natural England's comments**

We welcome the positive engagement from Devon Countryside Access Forum during the development of our proposals.

In developing our proposals we considered in detail a number of other options for the Yealm Estuary, as set out in section 5g of the Overview document and in table 3.3.2 of report CKW3. Our proposal is for the 'ordinary' route of the England Coast Path to incorporate the ferry crossing and an 'alternative' route will be in place for when the ferry is not running.

The proposed alternative route will make use of existing public highways, an existing walked permissive route and rights of way including parts of the Erme-Plym Trail. It would extend to Wapplewell, Brixton and Yealmpton which are the first public foot crossings over the River Yealm and its tributaries.

We looked at a number of options for the alternative route including: aligning through Wembury Wood and then along a permissive path through Hollacombe Woods; and using the network of lanes nearest the Yealm between the A379, Puslinch Bridge, past Wrescombe and Newton Downs and then down Parsonage Road and Bridgend Hill. The reasons for not proposing these options are set out in table 3.3.2 of report CKW3.

Our proposed alternative route uses those existing walked routes located closest to the estuary, even though in places it is quite a considerable distance from it. However even if the path was close to the estuary in many places the woody vegetation along much of the banks is such that even when only a few metres away from the estuary, the views of it are minimal.

We note the point raised by the Devon Countryside Access Forum about exploring the potential for increasing the hours of operation of the ferry service. The ferry across the mouth of the Yealm estuary between Warren Cottage and Ferry Wood operates a seasonal service from 1<sup>st</sup> April until 30<sup>th</sup> September and runs every day between 10 am and 4 pm. Service may be restricted to the core hours of 10 am to 12 noon and 3 pm to 4 pm each day, during bad weather or quieter times. The ferry is run as a commercial operation and we judged its availability to be adequate to be designated as the ordinary route. Increasing the existing hours of operation beyond this is not considered viable and additional funding is not available to provide for an extension to this service. See Part 5 of the Overview document for a detailed analysis of our decision to use the ferry crossing at the Yealm.

**Relevant appended documents (see section 5):**

N/A

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***Other representations***

**Representation ID:**

MCA/CKW3/R/2/CKW0244

**Organisation/ person making representation:**

Woodland Trust

**Name of site:**

Hollacombe Wood

**Report map reference:**

CKW 3c

**Route sections on or adjacent to the land:**

CKW-3-A009 to CKW-3-A013

**Other reports within stretch to which this representation also relates**

N/A

**Summary of representation:**

The Woodland Trust supports the amended route CKW-3-A009 to CKW-3-A013 that now avoids the Woodland Trust owned Hollacombe Wood.

**Natural England's comment:**

We note the support from the Woodland Trust to the route that we proposed. We opted for this route as it follows existing public rights of way, an existing walked path and public highway and avoids using a permissive path through Hollacombe Wood which is owned and managed by the Woodland Trust. This permissive path was not felt to be suitable for use as an alternative route due to land management concerns of the owners.

**Relevant appended documents (see Section 5):**

N/A

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**Representation ID:**

MCA/CKW3/R/3/CKW2886

**Organisation/ person making representation:**

[Redacted]

**Name of site:**

The Yealm Estuary

**Report map reference:**

CKW3d, 3e, 3f & 3g

**Route sections on or adjacent to the land:**

CKW-3- A016 through to CKW-3-A034

i.e. from where the proposed route crosses the old railway line near the top of Cofflete Creek to where it re-crosses the old line near the footbridge across the River Yealm.

**Other reports within stretch to which this representation also relates**

N/A

**Summary of representation:**

For many years there have been discussions about creating a walking and cycling path on the disused railway line which runs through Yealmpton. If a path was created on along this it could become part of the ECP with an improved route avoiding sections CKW-3-A017 to CKW-3-A033 (some of which follow a busy main road).

**Natural England's comment:**

We note the comments on our proposals.

If in the future a walking and cycling path was to be created along the disused railway line running through Yealmpton, Natural England will review its trail alignment and if appropriate, will prepare a separate variation report to the Secretary of State.

**Relevant appended documents (see Section 5):**

N/A

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**Representation ID:**

MCA/CKW3/R/4/CKW2687

**Organisation/ person making representation:**

South West Coast Path Association

**Name of site:**

Yealm Estuary

**Report map reference:**

Report CKW 3, maps CKW 3a to CKW 3j inclusive.

**Route sections on or adjacent to the land:**

CKW-3-A001 to CKW-3-A052 inclusive.

**Other reports within stretch to which this representation also relates**

N/A

**Summary of representation:**

The principle of providing an 'alternative' route around the Yealm Estuary, for promotion and use when the very infrequent and often irregular ferry is not running, is strongly supported.

However, there is concern that the proposed route is in no way maritime or estuarine. Despite its long length around the estuary, it has little or no estuarine character and few if any estuarine views. This is particularly disappointing given the discussion under Figure 37 of the Approved Plan document, which uses the Yealm as an example. Here it mentions that "there is considerable potential to improve public access upstream". In contrast, the proposed alternative route creates no new public access, is for long lengths on roads, and is in places a distance from the estuary.

**Natural England's comment:**

We welcome the positive engagement from the South West Coast Path Association during the development of our proposals.

In developing our proposals we considered in detail a number of other options for the Yealm Estuary, as set out in section 5g of the Overview document and in table 3.3.2 of report CKW3. Our proposal is for the 'ordinary' route of the England Coast Path to incorporate the ferry crossing and an 'alternative' route will be in place for when the ferry is not running.

The proposed alternative route will make use of existing public highways, an existing walked permissive route and rights of way including parts of the Erme-Plym Trail. It would extend to Wapplewell, Brixton and Yealmpton which are the first public foot crossings over the River Yealm and its tributaries.

We looked at a number of options for the alternative route including: aligning through Wembury Wood and then along a permissive path through Hollacombe Woods; and using the network of lanes nearest the Yealm between the A379, Puslinch Bridge, past Wrescombe and Newton Downs and then down Parsonage Road and Bridgend Hill. The reasons for not proposing these options are set out in table 3.3.2 of report CKW3.



Our proposed alternative route uses those existing walked routes located closest to the estuary, even though in places it is quite a considerable distance from it. However even if the path was close to the estuary in many places the woody vegetation along much of the banks is such that even when only a few metres away from the estuary, the views of it are minimal.

In terms of the Yealm Estuary being included in Natural England's Approved Scheme 2013 (Chapter 11) as an example of how the estuary criteria could be considered, section 11.1 of the Scheme states "The analysis illustrates how the estuary criteria will be applied, but it is not a substitute for the detailed analysis which will take place during the preparation of our proposals to the Secretary of State on each of the estuaries shown. For these reasons, our eventual proposal to the Secretary of State on the estuaries illustrated here may be different from any of the options described."

**Relevant appended documents (see Section 5):**

N/A

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**Representation ID:**

MCA/CKW3/R/5/CKW0008

**Organisation/ person making representation:**

The Disabled Ramblers

**Name of site:**

N/A

**Report map reference:**

- Map CKW 3a Warren Point to Wembury
- Map CKW 3b Wembury to Hollacombe Hill
- Map CKW 3c Hollacombe Hill to Spriddlestone
- Map CKW 3d Spriddlestone to Brixton
- Map CKW 3e Brixton to Pondfield Plantation
- Map CKW 3f Pondfield Plantation to Yealmpton
- Map CKW 3g Yealmpton to Gala Cross
- Map CKW 3h Gala Cross to Woodpark Plantation
- Map CKW 3i Woodpark Plantation to Bridgend
- Map CKW 3j Bridgend to Ferry Wood, Noss Mayo

**Route sections on or adjacent to the land:**

Report CKW 3: All route sections generally.

**Other reports within stretch to which this representation also relates**

N/A

**Summary of representation:**

Disabled Ramblers has concerns where access furniture along the trail is not of a suitable standard for those who use all-terrain mobility vehicles and pushchairs. Natural England should ensure that any existing or new infrastructure does not present a barrier to their ability to progress along the Coast Path.

Disabled Ramblers requests that Natural England address with the necessary parties involved, the issue of existing man-made structures that are a barrier to those who use mobility vehicles; and ensure that all existing and proposed new structures along the Coast Path are suitable for

those who use large mobility vehicles, changing infrastructure as needed, and complying with *British Standard BS5709: 2018 Gaps Gates and Stiles*.

**Natural England's comment:**

We welcome the positive engagement from the Disabled Ramblers. After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Cremyll to Kingswear stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Any changes to and improvements of furniture included in our reports do not inhibit use by mobility vehicles where the surrounding nature of the route makes this feasible; all new furniture will meet the British Standard 5709:2018 Gaps, Gates and Stiles.

Because of current access restrictions (relating to lockdown restrictions and site visits), it may not be possible to agree specific new projects until the establishment phase of the process.

**Relevant appended documents (see Section 5):**

5C - MCA/CKW3/R/5/CKW0008 - Disabled Ramblers Notes on Infrastructure

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## Length Report CKW4

### *Full representations*

**Representation number:**

MCA/CKW Stretch/R/1/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

**Other reports within stretch to which this representation also relates:**

CKW3 to CKW9

**Representation in full**

The Devon Countryside Access Forum expects, as part of the implementation process, that signage and waymarking will be clear, especially at points of decision where paths may go in different directions. Signage should reflect the nature of the path and be appropriate to the

landscape to avoid sign clutter or urbanisation. Users should be encouraged to have maps available, especially away from residential areas.

### **Natural England's comments**

We welcome the positive engagement from Devon Countryside Access Forum (DCAF) during the development of our proposals. As part of the implementation process we, together with the relevant access authority, will ensure that signage is clear and appropriate, particularly at junctions.

### **Relevant appended documents (see section 5):**

N/A

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### **Representation number:**

MCA/CKW Stretch/R/2/CKW2633

### **Organisation/ person making representation:**

Devon Countryside Access Forum

### **Route section(s) specific to this representation:**

CKW stretch

### **Other reports within stretch to which this representation also relates:**

CKW4, CKW5, CKW7, CKW8, CKW9

### **Representation in full**

#### **Complex roll-back**

The Devon Countryside Access Forum notes the significant number of more complex roll-back locations which have been identified in the reports. There is concern that there is no limit to how far inland roll-back might apply, given excepted land and environmental obligations. The Forum agrees that simple roll-back should take place. The Devon Countryside Access Forum advises that it does not seem appropriate for roll-back to take place in the complex situations cited in the reports. Roll-back does not provide any statutory process for consultation, and could impact on landowners hitherto unaware that their land could be affected.

The Devon Countryside Access Forum advises that it would be more appropriate to publish variation reports in these instances to formally allow landowners and others, such as the DCAF, to make objection or representation.

### **Natural England's comments**

In our published Overview document we explain that ordinarily, where roll-back has been proposed and becomes necessary, we would expect the trail to be adjusted to follow the current feature (for example, the cliff edge or top of foreshore). Where we foresee that local circumstances will require more detailed consideration, we provided further information about the situation in the relevant report. We call this 'complex rollback'; such situations may include where the trail can't roll back in the normal way because of an obstruction, excepted land or because of environmental considerations.

We have taken and will continue to take all reasonable steps to discuss implications and options with all parties likely to be affected by such changes, both during the initial planning work that preceded the writing of the reports for each length, and during any future work to plan and implement a 'rolled back' route.

## Relevant appended documents (see section 5):

N/A

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### Representation number:

MCA/CKW Stretch/R/3/CKW2633

### Organisation/ person making representation:

Devon Countryside Access Forum

### Route section(s) specific to this representation:

CKW stretch

### Other reports within stretch to which this representation also relates:

CKW3 to CKW9

## Representation in full

### Disability access

The Devon Countryside Access Forum is aware that many sections of the coast path include man-made obstacles such as path furniture (stiles, steps and gate design), narrow chicanes or lack of drop kerbs which make access difficult for people with limited mobility. There are other instances where upgrades to path surface, width or drainage could make access easier. The Forum advises that Natural England considers this in implementing the England Coast Path in Devon and works with land managers and other partners to secure improvements. It may be possible to identify particular stretches of path where the gains to access would be most beneficial. While the Forum recognises that issues of topography might make accessing some areas challenging, there are often many simple actions which can be taken to improve access for disabled people.

To give an example, the kerb in this photo (on the existing South West Coast Path) makes access through the gate difficult but could be replaced at modest cost with a ramp.



### Natural England's comments

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Cremyll to Kingswear stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Because of current access restrictions (relating to lockdown restrictions and site visits), it may not be possible to agree specific new projects until the establishment phase of the process.

**Relevant appended documents (see section 5):**

5A - MCA/CKW Stretch/R/3/CKW2633 - Devon Countryside Access Forum Disability Access Position Statement 2017

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**Representation number:**

MCA/CKW Stretch/R/4/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

**Other reports within stretch to which this representation also relates:**

CKW3 to CKW9

**Representation in full**

The Devon Countryside Access Forum advises that comprehensive information about ferries and alternative options should be available to assist people undertaking a long-distance walk.

**Natural England's comments**

As part of the implementation process we, together with the access authority and the South West Coast Path Association, will seek to ensure that information about ferries and alternative options will be available to assist people using the coast path and those undertaking long-distance walks. Our reports include an estimate of the capital costs for physical establishment of the new trail and one element of the overall cost for report CKW2 is for a number of new signs and information boards which would be needed on the trail particularly at the start and end points of the alternative route around the Yealm Estuary.

**Relevant appended documents (see section 5):**

N/A

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**Representation number:**

MCA/CKW4/R/1/CKW2660

**Organisation/ person making representation:**

Ramblers Association Devon

**Route section(s) specific to this representation:**

Directions Map CKW 4a and maps CKW 4a and CKW 4b, route sections CKW-4-S020 to CKW-4-S029

**Other reports within stretch to which this representation also relates:**

N/A

**Representation in full**

**Directions Map CKW4a route sections CKW-4-S020 to CKW-4-S029** and the text at paragraph 4.2.13

I question the reason for the “all the year” exclusion to the coastal access margin in these sections of the trail. I am very familiar with this stretch of the coast to Mothecombe beach and I cannot ever recall seeing or hearing shooting or any evidence of it taking place. Yet I am told it does happen. I have to suggest that shooting in the coastal margin and in close proximity to the existing South West Coast Path (a public right of way here) would be a highly dangerous practice.

If shooting is to take place then the direction should be limited at least to the relevant shooting season and ideally only applied only to days when shooting is actually taking place. Further there is “de facto” access to beaches on this stretch from the existing coast path. The direction appears to be an attempt to frustrate public access.

**Text in the table at paragraph 4.3.1** I suggest there is some inconsistency in the “Roll-back” as shown in Column 3. No roll-back is proposed for sections CKW-4-S008 to CKW-4-S013 (maps CKW 4a and CKW 4b) but this is similar terrain to that in sections CKW-4- S014 to CKW-4-S017 and CKW- 4-S020 etc. where roll-back is proposed.

**Natural England’s comments**

We welcome the positive engagement from Ramblers Association Devon during the development of our proposals.

**Directions Map CKW4a**

Access to the land in the coastal margin adjacent to route sections CKW-4-S020 to CKW-4-S029 is to be excluded all year-round by direction under section s24 of the Countryside and Rights of Way Act (2000) to prevent disturbance to gamebirds and disruption to shooting on the Carswell Estate. It is not to a public safety exclusion – the estate manage the shoot to ensure the safety of walkers. This is explained under Shooting Season below.

Carswell Estate informed Natural England that they have built the shooting business up over 30 years, with trees planted, cover crops grown, development of conducive habitat and installation of fencing and tracks on the coastal cliffs. The unique selling point of the shoot is that it is a coastal shoot with the most popular drives being those with the guns standing on the beaches.

There is the necessity for a year-round total exclusion in the coastal margin on the Carswell Estate for the following reasons (see paragraphs 4.2.13 & 4.2.14 of report CKW4):

- Disturbance to game during the pre-shoot season
- Disturbance to game during the shoot season
- Disruption to shooting during the shoot season
- Disturbance to released English Grey Partridge between February and August

Pre- shoot season

The Approved Coastal Access Scheme 2013 states at 8.9.15:

*Directions are most likely to be necessary in areas that the public visit regularly and where one or more of the following factors is present:*

- *visitors would be likely to pass close to a nesting area or to release pens during the first four to six weeks following release;*
- *routes through the spreading room likely to be favoured by visitors bring them into close proximity with the game;*
- *the direction of any disturbance is likely to cause birds to move off the estate;*
- *neighbouring land outside the control of the gamekeeper provides alternative suitable habitat that is likely to attract significant numbers of birds if they are disturbed;*
- *cover is sparse and the birds are more likely to seek alternative habitat in response to regular disturbance; or*
- *a small estate has fewer drives and so is less able to absorb regular disturbance.*

Due to the location and number of breeding pens, drives and gun pegs in the coastal margin, and all of the above factors being relevant here, and with high levels of year round access, an exclusion is proposed to prevent disturbance to habituated game in the pre-shoot season.

### Shooting Season

The Approved Coastal Access Scheme 2013 states at 8.11.15:

*Directions may be necessary for land management purposes in relation to other types of quarry – in particular driven shoots, where they occur on the coast – if:*

- *the trail passes through or very close to a drive or an area favoured by shooters;*
- *the quarry is likely to respond by moving away from the area; and*
- *it is impractical following the disturbance for the shoot organisers to recover the quarry or relocate the shoot before it takes place.*

Again with all three of these factors being an issue here an exclusion is proposed during the shooting season to prevent disturbance to game.

The current situation is that there is no public access to the proposed coastal margin south of the South West Coast Path (SWCP) except for a footpath to Wadham Beach. Therefore the estate has based much of its shooting business and infrastructure on the coastal cliffs. It has been able to shoot safely following established codes of practice, careful location of guns and drives and by using 'stops', people at either end of the section of SWCP nearest to that day's shooting, and on the footpath or beach, to manage the passage of people. With unrestricted access to the coastal margin and high year round levels of access it will be much more difficult for the shoot to manage the passage of visitors.

The Approved Coastal Access Scheme 2013 states in 8.11.25:

*Shooters may be distracted by the need for extra vigilance to prevent any risk of accidental injury to visitors. Intervention is only likely to be necessary for this purpose where shooting coincides with times and places where visitors are likely to be present. This is most likely to occur where there is a commercial shooting enterprise, but may occur during other forms of shooting and*

*8.11.31 Directions will not normally be necessary for this purpose but we may use them for land management purposes where:*

- *the timing of the shoot unavoidably coincides with times when visitors are likely to be present; and*

- *it is not practical to manage the passage of visitors effectively through the area while the shoot takes place.*

With access to the coastal cliffs it is likely the public would use the trackways established to manage the gamebirds and this would bring them in close proximity to the drives and guns. Therefore, as the timing of shoots is likely to be when visitors are present, it will be very difficult to manage the passage of visitors. Therefore a direction to prevent disruption to the shoot is proposed to exclude people on shoot days.

### February to August

There is also a programme underway to reintroduce grey partridge along this stretch of coastal cliff and a further period of closure is required during the breeding season to prevent disturbance to these breeding game. Partridge are particularly sensitive to disturbance in the spring, when pairs are choosing nest sites, and then egg laying. Another critical time is in late June when disturbance can cause dispersion of young from their nests resulting in predation. Grey partridge are another selling point of the shoot's business and therefore a s24 land management exclusion is proposed to reduce disturbance.

### Additional comments

We considered other options for aligning the trail seaward of the existing South West Coast Path (SWCP) in this area (as set out in table 4.3.2 of report CKW4) but it has not been possible to find a more seaward route. The provision of a cliff top trail as well as the existing public right of way would make the area unusable for a shoot because of the disturbance on both sides of the game cover. This could cause a reduction in the scale of the shoot and lead to questions about its ongoing commercial viability. However there may be potential in part of this area to align the trail further seaward of its proposed alignment along the SWCP, linked with a future application by the landowner for a Public Path Diversion Order. If appropriate, Natural England will prepare a separate variation report to the Secretary of State to ensure an uninterrupted journey for this part of the coast.

With reference to access to beaches along this stretch, the proposed restriction does not include the main beaches along this stretch, including Stoke Beach, Row Cove, Sandy Cove and Wadham Beach, see Directions Map CKW 4A for details. There is currently access along public footpaths from the existing coast path to Stoke Beach and Row Cove and also to Wadham Beach. This existing access to these beaches will not be affected by the proposed direction. Directions have no legal effect on land where coastal access rights do not apply, including excepted land – highways, including public footpaths and bridleways are treated as excepted land under the 2009 Act and directions may not therefore be used to control rights of access over them.

### **Roll back**

Rollback has been proposed on sections of the trail where evidence suggests that future erosion or other types of coastal change may impact on the line of the coast path (see section 6d of the Cremyll to Kingswear Overview). We use data provided in the South Devon and Dorset Shoreline Management Plan SMP2 and by the Environment Agency to help us identify these sections. In some cases we have identified a possible requirement for roll-back where there are no obvious issues with erosion, to ensure that we can maintain continuity of the trail should a nearby section of the trail be affected by coastal change. This approach has been used consistently for all sections of the trail including those mentioned by the Ramblers Association (sections CKW-4-S008 to CKW-4-S020).



**Relevant appended documents (see section 5):**

N/A

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***Other representations***

**Representation ID:**

MCA/CKW4/R/2/CKW0008

**Organisation/ person making representation:**

The Disabled Ramblers

**Name of site:**

N/A

**Report map reference:**

- Map CKW 4a Yealm Estuary to The Warren
- Map CKW 4b The Warren to Dunny Cove
- Map CKW 4c Dunny Cove to Stoke Cross
- Map CKW 4d Stoke Cross to Ryder's Hole
- Map CKW 4e Ryder's Hole to Keaton Cove
- Map CKW 4f Keaton Cove to Mothecombe Beach

**Route sections on or adjacent to the land:**

1. Report CKW 4: All route sections generally.
2. Maps CKW 4a to 4b CKW-4-S003 to CKW-4-S016

**Other reports within stretch to which this representation also relates**

N/A

**Summary of representation:**

**Comment 1**

Disabled Ramblers has concerns where access furniture along the trail is not of a suitable standard for those who use all-terrain mobility vehicles and pushchairs. Natural England should ensure that any existing or new infrastructure does not present a barrier to their ability to progress along the Coast Path.

Disabled Ramblers requests that Natural England address with the necessary parties involved, the issue of existing man-made structures that are a barrier to those who use mobility vehicles; and ensure that all existing and proposed new structures along the Coast Path are suitable for those who use large mobility vehicles, changing infrastructure as needed, and complying with *British Standard BS5709: 2018 Gaps Gates and Stiles*.

**Comment 2**

**Maps CKW 4a to 4b CKW-4-S003 to CKW-4-S016 Revelstoke Drive**

The terrain along this popular part of the coast path is very good for all-terrain mobility vehicles, however there are many barriers and gates which prevent access. The Disabled Ramblers

requests that the gates should be replaced with appropriate, new and well positioned gates to allow access to this popular area for those who use all-terrain mobility vehicles.

**Natural England's comment:**

We welcome the positive engagement from the Disabled Ramblers. After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Cremyll to Kingswear stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified (including those relating to the barriers along route sections CKW-4-S003 to CKW-4-S016), we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Any changes to and improvements of furniture included in our reports do not inhibit use by mobility vehicles where the surrounding nature of the route makes this feasible; all new furniture will meet the British Standard 5709:2018 Gaps, Gates and Stiles.

Because of current access restrictions (relating to lockdown restrictions and site visits), it may not be possible to agree specific new projects until the establishment phase of the process.

**Relevant appended documents (see Section 5):**

5C - MCA/CKW4/R/2/CKW0008 - Disabled Ramblers Notes on Infrastructure

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## Length Report CKW6

### *Full representations*

**Representation number:**

MCA/CKW Stretch/R/1/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

**Other reports within stretch to which this representation also relates:**

CKW3 to CKW9

**Representation in full**

The Devon Countryside Access Forum expects, as part of the implementation process, that signage and waymarking will be clear, especially at points of decision where paths may go in different directions. Signage should reflect the nature of the path and be appropriate to the landscape to avoid sign clutter or urbanisation. Users should be encouraged to have maps available, especially away from residential areas.

### **Natural England's comments**

We welcome the positive engagement from Devon Countryside Access Forum (DCAF) during the development of our proposals. As part of the implementation process we, together with the relevant access authority, will ensure that signage is clear and appropriate, particularly at junctions.

### **Relevant appended documents (see section 5):**

N/A

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### **Representation number:**

MCA/CKW Stretch/R/2/CKW2633

### **Organisation/ person making representation:**

Devon Countryside Access Forum

### **Route section(s) specific to this representation:**

CKW stretch

### **Other reports within stretch to which this representation also relates:**

CKW4, CKW5, CKW7, CKW8, CKW9

### **Representation in full**

#### **Complex roll-back**

The Devon Countryside Access Forum notes the significant number of more complex roll-back locations which have been identified in the reports. There is concern that there is no limit to how far inland roll-back might apply, given excepted land and environmental obligations. The Forum agrees that simple roll-back should take place. The Devon Countryside Access Forum advises that it does not seem appropriate for roll-back to take place in the complex situations cited in the reports. Roll-back does not provide any statutory process for consultation, and could impact on landowners hitherto unaware that their land could be affected.

The Devon Countryside Access Forum advises that it would be more appropriate to publish variation reports in these instances to formally allow landowners and others, such as the DCAF, to make objection or representation.

### **Natural England's comments**

In our published Overview document we explain that ordinarily, where roll-back has been proposed and becomes necessary, we would expect the trail to be adjusted to follow the current feature (for example, the cliff edge or top of foreshore). Where we foresee that local circumstances will require more detailed consideration, we provided further information about the situation in the relevant report. We call this 'complex rollback'; such situations may include where the trail can't roll back in the normal way because of an obstruction, excepted land or because of environmental considerations.

We have taken and will continue to take all reasonable steps to discuss implications and options with all parties likely to be affected by such changes, both during the initial planning work that preceded the writing of the reports for each length, and during any future work to plan and implement a 'rolled back' route.

### **Relevant appended documents (see section 5):**

N/A

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**Representation number:**

MCA/CKW Stretch/R/3/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

**Other reports within stretch to which this representation also relates:**

CKW3 to CKW9

**Representation in full**

**Disability access**

The Devon Countryside Access Forum is aware that many sections of the coast path include man-made obstacles such as path furniture (stiles, steps and gate design), narrow chicanes or lack of drop kerbs which make access difficult for people with limited mobility. There are other instances where upgrades to path surface, width or drainage could make access easier. The Forum advises that Natural England considers this in implementing the England Coast Path in Devon and works with land managers and other partners to secure improvements. It may be possible to identify particular stretches of path where the gains to access would be most beneficial. While the Forum recognises that issues of topography might make accessing some areas challenging, there are often many simple actions which can be taken to improve access for disabled people.

To give an example, the kerb in this photo (on the existing South West Coast Path) makes access through the gate difficult but could be replaced at modest cost with a ramp.



**Natural England's comments**

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Cremyll to Kingswear stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would

agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Because of current access restrictions (relating to lockdown restrictions and site visits), it may not be possible to agree specific new projects until the establishment phase of the process.

**Relevant appended documents (see section 5):**

5A - MCA/CKW Stretch/R/3/CKW2633 - Devon Countryside Access Forum Disability Access Position Statement 2017

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**Representation number:**

MCA/CKW Stretch/R/4/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

**Other reports within stretch to which this representation also relates:**

CKW3 to CKW9

**Representation in full**

The Devon Countryside Access Forum advises that comprehensive information about ferries and alternative options should be available to assist people undertaking a long-distance walk.

**Natural England's comments**

As part of the implementation process we, together with the access authority and the South West Coast Path Association, will seek to ensure that information about ferries and alternative options will be available to assist people using the coast path and those undertaking long-distance walks. Our reports include an estimate of the capital costs for physical establishment of the new trail and one element of the overall cost for report CKW2 is for a number of new signs and information boards which would be needed on the trail particularly at the start and end points of the alternative route around the Yealm Estuary.

**Relevant appended documents (see section 5):**

N/A

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**Representation number:**

MCA/CKW6/R/1/CKW2660

**Organisation/ person making representation:**

Ramblers Association Devon

**Route section(s) specific to this representation:**

Report CKW 6 The Avon Estuary

**Other reports within stretch to which this representation also relates:**

N/A

### **Representation in full**

**Text at paragraph 6.2.2** Please see the comments made in relation to the ferry in our representations for Report CKW 5.

[Words from CKW 5 representation inserted by Natural England] "The increase in the operating hours of the ferry to an "all the day throughout the year" service is welcomed but this MUST be achieved and not be just an expression of hope that comes to nothing".

**Maps CKW 6a to CKW 6e Sections CKW-6-A001 to CKW-6-A048** Ramblers accept and agree that the "alternative" route provided by the Avon Estuary trail is the obvious and practicable route to take as an alternative to the ferry crossing. However if the "all day throughout the year" ferry service is not put into place there are sections of the alternative route which would be improved by re-routing nearer to the estuary bank (as intimated in your text at paragraph 6.3.2). We will submit comments on that at the appropriate time.

### **Natural England's comments**

We welcome the positive engagement from Ramblers Association Devon during the development of our proposals.

### **Operation of the River Avon ferry**

There is currently a limited seasonal ferry service across the mouth of the estuary between Cockleridge Ham and Bantham. The Bantham Estate has provided assurances that the service is due to increase by the time the coastal access rights commence, to run throughout the year, except on Christmas Day, Boxing Day and during adverse weather conditions. Our proposal is to use our discretion to align the trail to follow the existing South West Coast Path (SWCP) which will utilise the improved ferry service. We will also align an alternative route along the current Avon Estuary Walk around the estuary that users can use when the ferry is not in service, for instance in the evenings and during adverse weather conditions.

We note the point raised by the Ramblers Association that this increase in operating hours must be achieved. The ferry is run as a commercial operation and we judged that its availability, particularly with the increased hours of operation, is adequate for it to form part of the ordinary route of the ECP.

### **Sections CKW-6-A001 to CKW-6-A048**

We note the point raised by the Ramblers Association about improving sections of the alternative route if the improved ferry service is not put into place. Should the ferry service cease altogether or become less suitable for purpose, Natural England will review its trail alignment and if appropriate, will prepare a separate variation report to the Secretary of State to ensure an uninterrupted journey along the trail. If we used our discretion to align the 'ordinary' route of the trail around the estuary to the first pedestrian crossing point at Aveton Gifford, we would look for opportunities to align the England Coast Path closer to the estuary than the existing promoted Avon Estuary Walk.

### **Relevant appended documents (see section 5):**

N/A

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**Representation number:**

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

Maps CKW 6a Cockleridge Ham to Bigbury; CKW 6b Bigbury to Tidal Road; CKW 6c Tidal Road to Little Efford Farm; CKW 6d Little Efford Farm to Stiddicombe Wood.

Also shown in part in Chapter CKW 5, map CKW 5f Bigbury-on-Sea to the Avon Estuary, and Chapter CK7, map CKW 7a Bantham to Butter Cove).

**Other reports within stretch to which this representation also relates:**

N/A

**Representation in full**

*Avon Estuary*

The Devon Countryside Access Forum strongly supports proposals for the Avon Estuary, provided that the anticipated improvements to the ferry service are put in place. The alternative route runs relatively close to the estuary and is the current alternative route for the South West Coast Path.

**Natural England's comments**

We welcome the positive engagement from the Devon Countryside Access Forum during the development of our proposals.

There is currently a limited seasonal ferry service across the mouth of the estuary between Cockleridge Ham and Bantham. The Bantham Estate has provided assurances that the service is due to increase by the time the coastal access rights commence, to run throughout the year, except on Christmas Day, Boxing Day and during adverse weather conditions. Our proposal is to use our discretion to align the trail to follow the existing South West Coast Path (SWCP) which will utilise the improved ferry service. We will also align an alternative route along the current Avon Estuary Walk around the estuary that users can use when the ferry is not in service, for instance in the evenings and during adverse weather conditions.

We note the point raised by the Devon Countryside Access Forum that the anticipated improvements in the ferry service need to be put in place. The ferry is run as a commercial operation and we judged its availability, particularly with the increased hours of operation, to be adequate for it to form part of the ordinary route of the ECP. However, should the ferry service cease altogether or become less suitable for purpose, Natural England will review its trail alignment and if appropriate, will prepare a separate variation report to the Secretary of State to ensure an uninterrupted journey along the trail.

**Relevant appended documents (see section 5):**

N/A

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***Other representations***

**Representation ID:**

MCA/CKW6/R/2/CKW2687

**Organisation/ person making representation:**

South West Coast Path Association

**Name of site:**

Avon Estuary

**Report map reference:**

Report CKW 6, maps CKW 6a to CKW 6e inclusive.

**Route sections on or adjacent to the land:**

CKW-6-A001 to CKW-6-A048 inclusive.

**Other reports within stretch to which this representation also relates**

N/A

**Summary of representation:**

The principle of providing an 'alternative' route around the Avon Estuary, for promotion and use when the very infrequent and often irregular ferry is not running, is strongly supported.

**Natural England's comment:**

We welcome the positive engagement from the South West Coast Path Association during the development of our proposals. We also refer to our comments above for representations MCA/CKW6/R/1/CKW2660 and MCA/CKW5/R/4/CKW2633 relating to the increase in operation of the current ferry service.

**Relevant appended documents (see Section 5):**

N/A

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**Representation ID:**

MCA/CKW6/R/3/CKW0008

**Organisation/ person making representation:**

The Disabled Ramblers

**Name of site:**

N/A

**Report map reference:**

- Map CKW 6a Cockleridge Ham to Bigbury
- Map CKW 6b Bigbury to Tidal Road
- Map CKW 6c Tidal Road to Little Efford Farm
- Map CKW 6d Little Efford Farm to Stiddicombe Wood Map CKW 6e Stiddicombe Wood to Bantham

**Route sections on or adjacent to the land:**

1. Report CKW 6: All route sections generally.
2. Maps CKW 6a to 6e CKW-6-A001 to CKW-6-A048
3. Map CKW 6b Section CKW-6-A016
4. Map CKW 6c Sections CKW-6-A034FW and CKW-6-A036FW

**Other reports within stretch to which this representation also relates**

N/A



## **Summary of representation:**

### **Comment 1**

Disabled Ramblers has concerns where access furniture along the trail is not of a suitable standard for those who use all-terrain mobility vehicles and pushchairs. Natural England should ensure that any existing or new infrastructure does not present a barrier to their ability to progress along the Coast Path.

Disabled Ramblers requests that Natural England address with the necessary parties involved, the issue of existing man-made structures that are a barrier to those who use mobility vehicles; and ensure that all existing and proposed new structures along the Coast Path are suitable for those who use large mobility vehicles, changing infrastructure as needed, and complying with *British Standard BS5709: 2018 Gaps Gates and Stiles*.

### **Comment 2**

Disabled Ramblers requests that the alternative route will be available at all times, even when the ferry is running, as mobility vehicles are unable to use the ferry.

### **Comment 3**

#### **Map 6b Section CKW-6-A016 FP**

There is an impassable kissing gate where this section joins the road.



Disabled Ramblers requests that the kissing gate should be replaced with a simple gap of 1.1m, or a two-way, self-closing pedestrian gate should be installed.

### **Comment 4**

#### **Map CKW 6c Sections CKW-6-A034FW and CKW-6-A036FW**

There are barriers to access at certain points.



Disabled Ramblers requests that the gaps in the wall leading to the off-road footways should be widened to allow large mobility vehicles to manoeuvre safely through, that tracks should be clear of growth and a gate should be removed.

**Natural England's comment:**

We welcome the positive engagement from the Disabled Ramblers. After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Cremyll to Kingswear stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified (including those relating to the barriers and gaps along

route sections CKW-6-A016, CKW-6-A034 and CKW-6-A036), we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Any changes to and improvements of furniture included in our reports do not inhibit use by mobility vehicles where the surrounding nature of the route makes this feasible; all new furniture will meet the British Standard 5709:2018 Gaps, Gates and Stiles.

Because of current access restrictions (relating to lockdown restrictions and site visits), it may not be possible to agree specific new projects until the establishment phase of the process.

Regarding the request from the Disabled Ramblers that the alternative route is available at all times (comment 2), although the ECP alternative route is only formally in operation when the ferry is closed, in practice it is available at all times because it follows the existing estuary promoted route that is underpinned by public rights of way.

#### **Relevant appended documents (see Section 5):**

5C - MCA/CKW6/R/3/CKW0008- Disabled Ramblers Notes on Infrastructure

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## **Length Report CKW7**

### ***Full representations***

#### **Representation number:**

MCA/CKW Stretch/R/1/CKW2633

#### **Organisation/ person making representation:**

Devon Countryside Access Forum

#### **Route section(s) specific to this representation:**

CKW stretch

#### **Other reports within stretch to which this representation also relates:**

CKW3 to CKW9

#### **Representation in full**

The Devon Countryside Access Forum expects, as part of the implementation process, that signage and waymarking will be clear, especially at points of decision where paths may go in different directions. Signage should reflect the nature of the path and be appropriate to the landscape to avoid sign clutter or urbanisation. Users should be encouraged to have maps available, especially away from residential areas.

#### **Natural England's comments**

We welcome the positive engagement from Devon Countryside Access Forum (DCAF) during the development of our proposals. As part of the implementation process we, together with the relevant access authority, will ensure that signage is clear and appropriate, particularly at junctions.

#### **Relevant appended documents (see section 5):**

N/A

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**Representation number:**

MCA/CKW Stretch/R/2/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

**Other reports within stretch to which this representation also relates:**

CKW4, CKW5, CKW7, CKW8, CKW9

**Representation in full**

**Complex roll-back**

The Devon Countryside Access Forum notes the significant number of more complex roll-back locations which have been identified in the reports. There is concern that there is no limit to how far inland roll-back might apply, given excepted land and environmental obligations. The Forum agrees that simple roll-back should take place. The Devon Countryside Access Forum advises that it does not seem appropriate for roll-back to take place in the complex situations cited in the reports. Roll-back does not provide any statutory process for consultation, and could impact on landowners hitherto unaware that their land could be affected.

The Devon Countryside Access Forum advises that it would be more appropriate to publish variation reports in these instances to formally allow landowners and others, such as the DCAF, to make objection or representation.

**Natural England's comments**

In our published Overview document we explain that ordinarily, where roll-back has been proposed and becomes necessary, we would expect the trail to be adjusted to follow the current feature (for example, the cliff edge or top of foreshore). Where we foresee that local circumstances will require more detailed consideration, we provided further information about the situation in the relevant report. We call this 'complex rollback'; such situations may include where the trail can't roll back in the normal way because of an obstruction, excepted land or because of environmental considerations.

We have taken and will continue to take all reasonable steps to discuss implications and options with all parties likely to be affected by such changes, both during the initial planning work that preceded the writing of the reports for each length, and during any future work to plan and implement a 'rolled back' route.

**Relevant appended documents (see section 5):**

N/A

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**Representation number:**

MCA/CKW Stretch/R/3/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum



## **Route section(s) specific to this representation:**

CKW stretch

## **Other reports within stretch to which this representation also relates:**

CKW3 to CKW9

## **Representation in full**

### **Disability access**

The Devon Countryside Access Forum is aware that many sections of the coast path include man-made obstacles such as path furniture (stiles, steps and gate design), narrow chicanes or lack of drop kerbs which make access difficult for people with limited mobility. There are other instances where upgrades to path surface, width or drainage could make access easier. The Forum advises that Natural England considers this in implementing the England Coast Path in Devon and works with land managers and other partners to secure improvements. It may be possible to identify particular stretches of path where the gains to access would be most beneficial. While the Forum recognises that issues of topography might make accessing some areas challenging, there are often many simple actions which can be taken to improve access for disabled people.

To give an example, the kerb in this photo (on the existing South West Coast Path) makes access through the gate difficult but could be replaced at modest cost with a ramp.



### **Natural England's comments**

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Cremyll to Kingswear stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Because of current access restrictions (relating to lockdown restrictions and site visits), it may not be possible to agree specific new projects until the establishment phase of the process.

## **Relevant appended documents (see section 5):**

**Representation number:**

MCA/CKW Stretch/R/4/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

**Other reports within stretch to which this representation also relates:**

CKW3 to CKW9

**Representation in full**

The Devon Countryside Access Forum advises that comprehensive information about ferries and alternative options should be available to assist people undertaking a long-distance walk.

**Natural England's comments**

As part of the implementation process we, together with the access authority and the South West Coast Path Association, will seek to ensure that information about ferries and alternative options will be available to assist people using the coast path and those undertaking long-distance walks. Our reports include an estimate of the capital costs for physical establishment of the new trail and one element of the overall cost for report CKW2 is for a number of new signs and information boards which would be needed on the trail particularly at the start and end points of the alternative route around the Yealm Estuary.

**Relevant appended documents (see section 5):**

N/A

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**Representation number:**

MCA/CKW7/R/1/CKW2660

**Organisation/ person making representation:**

Ramblers Association Devon

**Route section(s) specific to this representation:**

Maps CKW 7c and Map CKW 7j; CKW-7-S026 to CKW-7-S028

**Other reports within stretch to which this representation also relates:**

N/A

**Representation in full**

**Map CKW 7c, Sections CKW-7-S026 to CKW-7-S027 and text in paragraph 7.3.2** Other options considered. Ramblers suggest that if a route seaward of the properties here referred to is achievable then that should be the route of the trail.

**Map CKW 7c Section CKW-7-S028** Similar to the above, if a route seaward of the properties here (Seamark House) is achievable then that should be the route of the trail. However we are aware of the diversion of the SW Coast Path in this location in recent years.

**Map CKW 7j and text in paragraph 7.2.18** We accept the use of the Salcombe to East Portlemouth ferry for this crossing of the Kingsbridge estuary as it provides a full time every day service. In the event that it ceases to provide an adequate service we welcome the opportunity to work with Natural England to create a complete public footpath route around the entire Kingsbridge estuary, an area currently largely denied public access.

### **Natural England's comments**

We welcome the positive engagement from Ramblers Association Devon during the development of our proposals.

### **Sections CKW-7-S026 to CKW-7-S027**

In developing our proposals we considered aligning the trail along a field boundary between the existing South West Coast Path (SWCP) and the cliff edge, seaward of a number of properties, as set out in table 7.3.2 of report CKW7. We opted for the proposed route because the cliff has eroded almost to the edge of the gardens in some places and as such we felt that it was not a safe or particularly enjoyable alignment. We also had concerns about its short to medium term viability due to the ongoing erosion. In addition we felt that the existing alignment was suitable for the trail as it is on a quiet track with minimal traffic and good sight lines.

### **Section CKW-7-S028**

Some years ago in this location, the route of the SWCP was aligned along the cliff top seaward of a number of properties and their gardens. However due to erosion the path became unsafe to use and the SWCP was diverted along a landward route. As a seaward cliff top alignment would still be unsafe to use, we proposed that the trail here would follow the existing SWCP as currently walked and managed.

### **Operation of the Salcombe to East Portlemouth ferry**

We note the point raised by the Ramblers Association about the operation of the Salcombe to East Portlemouth ferry, which currently carries passengers daily throughout the year. However, should the ferry service cease altogether in the future or become less suitable for purpose, Natural England will review its trail alignment and if appropriate, will work with stakeholders and landowners to prepare a separate variation report to the Secretary of State to ensure an uninterrupted journey along the trail.

### **Relevant appended documents (see section 5):**

N/A

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### ***Other representations***

#### **Representation ID:**

MCA/CKW7/R/2/CKW0008

#### **Organisation/ person making representation:**

The Disabled Ramblers

**Name of site:**

N/A

**Report map reference:**

- Map CKW 7a Bantham to Butter Cove
- Map CKW 7b Butter Cove to Thurlestone Golf Course
- Map CKW 7c Thurlestone Golf Course to Thurlestone Sands
- Map CKW 7d Thurlestone Sands to Whitechurch
- Map CKW 7e Whitechurch to Bolberry Down
- Map CKW 7f Bolberry Down to Stannings Rocks
- Map CKW 7g Stannings Rocks to The Warren
- Map CKW 7h The Warren to The Rags
- Map CKW 7i The Rags to North Sands Bay
- Map CKW 7j North Sands Bay to Salcombe Ferry

**Route sections on or adjacent to the land:**

1. Report CKW 7: All route sections generally.
2. Map CKW 7c Thurlestone Sands

**Other reports within stretch to which this representation also relates**

N/A

**Summary of representation:****Comment 1**

Disabled Ramblers has concerns where access furniture along the trail is not of a suitable standard for those who use all-terrain mobility vehicles and pushchairs. Natural England should ensure that any existing or new infrastructure does not present a barrier to their ability to progress along the Coast Path.

Disabled Ramblers requests that Natural England address with the necessary parties involved, the issue of existing man-made structures that are a barrier to those who use mobility vehicles; and ensure that all existing and proposed new structures along the Coast Path are suitable for those who use large mobility vehicles, changing infrastructure as needed, and complying with *British Standard BS5709: 2018 Gaps Gates and Stiles*.

**Comment 2 – Map CKW7c Thurlestone Sands**

There are barriers to access at certain points including unsuitable gates and the footbridge at CKW-7-S021. Disabled Ramblers requests that all infrastructure is checked for suitability for use by those with all terrain mobility vehicles and changes made where necessary. Also that the positioning of the permanent structures at the car park take into account the need for access by large mobility vehicles who wish to access the trail.

**Natural England's comment:**

We welcome the positive engagement from the Disabled Ramblers. After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Cremyll to Kingswear stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.



Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified (including those relating to the area around Thurlestone Sands and the permanent structures at the car park), we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Any changes to and improvements of furniture included in our reports do not inhibit use by mobility vehicles where the surrounding nature of the route makes this feasible; all new furniture will meet the British Standard 5709:2018 Gaps, Gates and Stiles.

Because of current access restrictions (relating to lockdown restrictions and site visits), it may not be possible to agree specific new projects until the establishment phase of the process.

**Relevant appended documents (see Section 5):**

5C - MCA/CKW7/R/2/CKW0008 - Disabled Ramblers Notes on Infrastructure

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## Length Report CKW8

### *Full representations*

**Representation number:**

MCA/CKW Stretch/R/1/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

**Other reports within stretch to which this representation also relates:**

CKW3 to CKW9

**Representation in full**

The Devon Countryside Access Forum expects, as part of the implementation process, that signage and waymarking will be clear, especially at points of decision where paths may go in different directions. Signage should reflect the nature of the path and be appropriate to the landscape to avoid sign clutter or urbanisation. Users should be encouraged to have maps available, especially away from residential areas.

**Natural England's comments**

We welcome the positive engagement from Devon Countryside Access Forum (DCAF) during the development of our proposals. As part of the implementation process we, together with the relevant access authority, will ensure that signage is clear and appropriate, particularly at junctions.

**Relevant appended documents (see section 5):**

N/A

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**Representation number:**

MCA/CKW Stretch/R/2/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

**Other reports within stretch to which this representation also relates:**

CKW4, CKW5, CKW7, CKW8, CKW9

**Representation in full****Complex roll-back**

The Devon Countryside Access Forum notes the significant number of more complex roll-back locations which have been identified in the reports. There is concern that there is no limit to how far inland roll-back might apply, given excepted land and environmental obligations. The Forum agrees that simple roll-back should take place. The Devon Countryside Access Forum advises that it does not seem appropriate for roll-back to take place in the complex situations cited in the reports. Roll-back does not provide any statutory process for consultation, and could impact on landowners hitherto unaware that their land could be affected.

The Devon Countryside Access Forum advises that it would be more appropriate to publish variation reports in these instances to formally allow landowners and others, such as the DCAF, to make objection or representation.

**Natural England's comments**

In our published Overview document we explain that ordinarily, where roll-back has been proposed and becomes necessary, we would expect the trail to be adjusted to follow the current feature (for example, the cliff edge or top of foreshore). Where we foresee that local circumstances will require more detailed consideration, we provided further information about the situation in the relevant report. We call this 'complex rollback'; such situations may include where the trail can't roll back in the normal way because of an obstruction, excepted land or because of environmental considerations.

We have taken and will continue to take all reasonable steps to discuss implications and options with all parties likely to be affected by such changes, both during the initial planning work that preceded the writing of the reports for each length, and during any future work to plan and implement a 'rolled back' route.

**Relevant appended documents (see section 5):**

N/A

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**Representation number:**

MCA/CKW Stretch/R/3/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

## Other reports within stretch to which this representation also relates:

CKW3 to CKW9

### Representation in full

#### Disability access

The Devon Countryside Access Forum is aware that many sections of the coast path include man-made obstacles such as path furniture (stiles, steps and gate design), narrow chicanes or lack of drop kerbs which make access difficult for people with limited mobility. There are other instances where upgrades to path surface, width or drainage could make access easier. The Forum advises that Natural England considers this in implementing the England Coast Path in Devon and works with land managers and other partners to secure improvements. It may be possible to identify particular stretches of path where the gains to access would be most beneficial. While the Forum recognises that issues of topography might make accessing some areas challenging, there are often many simple actions which can be taken to improve access for disabled people.

To give an example, the kerb in this photo (on the existing South West Coast Path) makes access through the gate difficult but could be replaced at modest cost with a ramp.



#### Natural England's comments

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Cremyll to Kingswear stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Because of current access restrictions (relating to lockdown restrictions and site visits), it may not be possible to agree specific new projects until the establishment phase of the process.

#### Relevant appended documents (see section 5):

5A - MCA/CKW Stretch/R/3/CKW2633 - Devon Countryside Access Forum Disability Access Position Statement 2017

**Representation number:**

MCA/CKW Stretch/R/4/CKW2633

**Organisation/ person making representation:**

Devon Countryside Access Forum

**Route section(s) specific to this representation:**

CKW stretch

**Other reports within stretch to which this representation also relates:**

CKW3 to CKW9

**Representation in full**

The Devon Countryside Access Forum advises that comprehensive information about ferries and alternative options should be available to assist people undertaking a long-distance walk.

**Natural England's comments**

As part of the implementation process we, together with the access authority and the South West Coast Path Association, will seek to ensure that information about ferries and alternative options will be available to assist people using the coast path and those undertaking long-distance walks. Our reports include an estimate of the capital costs for physical establishment of the new trail and one element of the overall cost for report CKW2 is for a number of new signs and information boards which would be needed on the trail particularly at the start and end points of the alternative route around the Yealm Estuary.

**Relevant appended documents (see section 5):**

N/A

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***Other representations*****Representation ID:**

MCA/CKW8/R/1/CKW2673

**Organisation/ person making representation:**

Stokenham Parish Council

**Name of site:**

Torcross

**Report map reference:**

Map CKW 8i

**Route sections on or adjacent to the land:**

CKW-8-S107 FP to CKW-8-S110 FP

**Other reports within stretch to which this representation also relates**

N/A

**Summary of representation:**

It is considered by Stokenham Parish Council that the reinstatement of the coast path at Torcross is not the best use of public funds. Storm damage to this section of the path in 2018

rendered it unusable and it is suggested that any repairs may be short lived as this section is very exposed to the sea and susceptible to continuing coastal erosion.

The current coast path diversion is down some steep steps inward of the closed coast path onto Tor Church Road which is an acceptable alternative and we understand that the owner of The White House/Little House has offered her front garden as a route to the steps on the diverted path. Another alternative, subject to agreement with the owners, could be to leave the coast path along the access road for The White House and Cliff House and join Tor Church Road further up.

**Natural England's comment:**

We welcome the positive engagement from Stokenham Parish Council during the development of our proposals.

Our proposals at Torcross include reinstating the footpath at Torcross Point (route sections CKW-8-S107 to CKW-8-S110) at an estimated cost to the England Coast Path project of £43,800. This section of the coast path was damaged during Storm Emma in March 2018 and the access authority Devon County Council put a temporary closure on the footpath on safety grounds where a section of cliff had collapsed beneath the footpath, and a temporary inland diversion in place (see map below).



Devon County Council have proposed reinstatement works that would involve rock pinning, filling voids with concrete and building a full height stone wall and are seeking contributions from partners and stakeholders including Natural England to fund these works. They have undertaken similar works to the coast path at Hope Cove in the South Hams in 2016 and at Mothecombe Slip, also in the South Hams in 2017. Independent geotechnical advice has been commissioned by Devon County Council who would be undertaking the inspection and maintenance and the works are expected to last 100 years.

We considered other options for the trail at Torcross Point but the current inland coast path diversion using steep concrete steps and a narrow road, with much poorer views, isn't deemed to be wholly adequate and in our view doesn't meet the standards expected for a national trail.

The other option suggested by Stokenham Parish Council to leave the coast path along the access road for The White House and Cliff House and join Tor Church Road further up was also considered but this would be further inland with poorer views and would mean walkers using a narrow road with traffic.

However, should the reinstatement of the footpath at Torcross Point not go ahead, Natural England will review its trail alignment in this location. We have included proposals for route sections CKW-8-S107 to CKW-8-S110 to 'roll-back' either in direct response to coastal erosion or in order to link with other parts of the route that need to roll back as a direct result of coastal erosion (see table 8.3.4 of report CKW8). In this location, should the 'roll back' provision be used, we foresee that local circumstances will require more detailed consideration and we will work with the access authority, landowners and all parties likely to be affected by such changes, to plan and implement a 'rolled back' route.

**Relevant appended documents (see Section 5):**

N/A

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**Representation ID:**

MCA/CKW8/R/2/CKW2687

**Organisation/ person making representation:**

South West Coast Path Association

**Name of site:**

Torcross

**Report map reference:**

Map CKW 8i

**Route sections on or adjacent to the land:**

CKW-8-S107 to CKW-8-S110 inclusive.

**Other reports within stretch to which this representation also relates**

N/A

**Summary of representation:**

The proposal to use the traditional route at Torcross and thus avoid the need to use the more inland route which has in recent times been necessary is strongly welcomed.

**Natural England's comment:**

We welcome the positive engagement from the South West Coast Path Association during the development of our proposals and the support for our proposals to reinstate the footpath at Torcross Point.

**Relevant appended documents (see Section 5):**

N/A

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**Representation ID:**

MCA/CKW7/R/2/CKW0008

**Organisation/ person making representation:**

## The Disabled Ramblers

### **Name of site:**

N/A

### **Report map reference:**

- Map CKW 8a East Portlemouth Ferry to Portlemouth Down
- Map CKW 8b Portlemouth Down to Seacombe Sand
- Map CKW 8c Seacombe Sand to Elender Cove
- Map CKW 8d Elender Cove to Horseley Cove
- Map CKW 8e Horseley Cove to Lannacombe Beach
- Map CKW 8f Lannacombe Beach to Great Mattiscombe Sand
- Map CKW 8g Great Mattiscombe Sand to Hallsands
- Map CKW 8h Hallsands to Beesands
- Map CKW 8i Beesands to Torcross

### **Route sections on or adjacent to the land:**

1. Report CKW 8: All route sections generally.
2. Map CKW 8g, CKW-8-S075 Start Point

### **Other reports within stretch to which this representation also relates**

N/A

### **Summary of representation:**

#### **Comment 1**

Disabled Ramblers has concerns where access furniture along the trail is not of a suitable standard for those who use all-terrain mobility vehicles and pushchairs. Natural England should ensure that any existing or new infrastructure does not present a barrier to their ability to progress along the Coast Path.

Disabled Ramblers requests that Natural England address with the necessary parties involved, the issue of existing man-made structures that are a barrier to those who use mobility vehicles; and ensure that all existing and proposed new structures along the Coast Path are suitable for those who use large mobility vehicles, changing infrastructure as needed, and complying with *British Standard BS5709: 2018 Gaps Gates and Stiles*.

#### **Comment 2 – Start Point CKW-8-S075**

The car park at Start Point is a suitable place for users of wheelchairs and mobility scooters to access the Coast Path to visit the lighthouse. Between the car park and the lighthouse, there are two large metal gates across the road.





These are one way gates which are difficult, and for many impossible, for users of mobility scooters to reach the latch to open and close the gates. Disabled Ramblers requests that both gates should be changed to suitable structures to enable access by those who use mobility vehicles.

**Natural England's comment:**

We welcome the positive engagement from the Disabled Ramblers. After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Cremyll to Kingswear stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified (including those relating to the gates at Start Point), we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Any changes to and improvements of furniture included in our reports do not inhibit use by mobility vehicles where the surrounding nature of the route makes this feasible; all new furniture will meet the British Standard 5709:2018 Gaps, Gates and Stiles.

Because of current access restrictions (relating to lockdown restrictions and site visits), it may not be possible to agree specific new projects until the establishment phase of the process.

**Relevant appended documents (see Section 5):**

5C - MCA/CKW8/R/3/CKW0008 - Disabled Ramblers Notes on Infrastructure

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**Representation ID:**

MCA/CKW8/R/4/CKW2892

**Organisation/ person making representation:**



Natural England

**Name of site:**

Tinsey Head

**Report map reference:**

Map CKW 8h

**Route sections on or adjacent to the land:**

CKW-8-S090. Field near Tinsey Head

**Other reports within stretch to which this representation also relates**

N/A

**Summary of representation:**

The access authority, Devon County Council raised an issue on 28 February 2020 (after publication of the proposals) relating to a new set of cracks that has appeared in the path in a field north of Hallsands beach, approaching Tinsey Head (route section CKW-8-S090). These cracks have occurred near to a slump area that appeared in 2019 and although not directly connected to last year's slump area, the appearance is very similar to how that slump started and there are likely to be further earth movements with consequent impacts on the coast path in the near future. New temporary fencing and a diversion of the South West Coast Path has been put in place.

**Natural England's comment:**

In this location, cracks have appeared and it is likely that further slumping will occur in the near future. We believe that because of this the proposed location of the England Coast Path is no longer fit for purpose.

Because of current access restrictions (relating to lockdown restrictions and site visits), it may not be possible to agree a new alignment until later this year. However, once lockdown restrictions are lifted and site visits can once more be undertaken, we will work with Devon County Council and the landowner (the National Trust) to identify and map a new route for the coast path inland of section CKW-8-S090. We would ask that the Secretary of State approves this revised route alongside the remaining proposals for report CKW8.

**Relevant appended documents (see Section 5):**

5D - MCA/CKW8/R/4/CKW2892 - Email from [redacted] to [redacted] 28-02-2020

5E - MCA/CKW8/R/4/CKW2892 – Email from [redacted] to [redacted] 09-03-2020

## **5. Supporting documents**

5A - MCA/CKW Stretch/R/3/CKW2633 - Devon Countryside Access Forum Disability Access Position Statement 2017



**Devon Countryside Access Forum**  
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County Hall  
Topsham Road  
EXETER EX2 4QD

Tel: 07837 171000  
01392 382084

[devoncaf@devon.gov.uk](mailto:devoncaf@devon.gov.uk)  
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## **Devon Countryside Access Forum**

### **Physical Disability Access Position Statement**

The Devon Countryside Access Forum recognises that everyone, whether residents or visitors, should be able to enjoy recreation in Devon's natural environment.

#### **The issue**

This Position Statement sets out recommendations for improving access to the countryside for people with limited mobility, including on Public Rights of Way and cycle/multi-use trails, and points readers to more detailed information.

Although this Statement focuses particularly on physical disabilities, it is worth noting that limited mobility affects a range of people, including parents with children in buggies; elderly or frail people, who might use an electric mobility scooter or wheelchair; and people with walking aids. Improving access for wheelchairs and large off road electric mobility scooters can improve access for all.

Research shows that people with limited mobility are less likely to say they can access 'green spaces' and are less likely to visit the countryside. This is because they experience barriers that can be impossible to navigate. Barriers can include:

- stiles;
- steps;
- narrow gates, entrances, paths and exits;
- difficult or high handles and latches on gates;
- logs or earth mounds;
- steep gradients and cross-gradients; and
- overgrown vegetation.

The DCAF recognises that there are some routes that cannot be made accessible because of flights of steps or unavoidably narrow sections. However, many barriers can be removed at relatively low cost, opening up significant areas of countryside to more disabled people. The aim should be to achieve the least restrictive option.

Disabled people are now benefiting from ongoing technological improvements in mobility aids. Now, electric and all terrain scooters/buggies, such as the off-road Trampler, can cope with more challenging gradients (25%) and cross gradients as well as having good ground clearance. All terrain type scooters are quite capable of going across grass fields and open moorland. Such off road scooters can even manage distances of 20 to 40 miles. A modest improvement to a gate may open up more extensive areas for access.

The Devon Countryside Access Forum is a local access forum. It is required, in accordance with Sections 94 and 95 of the Countryside and Rights of Way (CROW) Act 2000, to provide advice as to the improvement of public access to land for the purposes of open-air recreation and enjoyment.



Access managers often under-estimate the capability of this new generation of off-road mobility scooters and may think access cannot be improved if routes are not suitable for wheelchairs, whereas it is highly likely that a Tramper off road scooter could cope adequately.

### **Making improvements**

Major modifications to routes using very specific criteria are often inappropriate, especially in rural areas, or very expensive but relatively minor changes can often result in a much more accessible and enjoyable route, particularly for people with all-terrain scooters.

Improvements must be agreed with landowners and should consider how disabled people might be able to access the route while maintaining necessary measures to control farm animals and any vehicles. In some instances changes will not be possible. Historic or locally important structures should be respected.

Some possible improvements include:

- Replacing stiles and kissing gates with 1.5 m wide gates with good latches and trombone handles. Where self-closing gates are required a two-way gate is preferable. Kissing gates that can be operated by radar keys may be an option in some locations. (e.g. National Trust Parke estate and Fremington Quay nature reserve). Latches are often over-looked but can ensure gates can be easily opened and closed. They should be positioned where they can be reached and in good condition. Long handles which can be reached at different heights are useful to open gates.
- Ensuring the path width and surface are suitable for wheelchairs, buggies and trampers helps many people. This does not mean that a route requires a road surface – minimising puddles, roots and ruts may be all that is needed. Many disabled people still want a countryside experience.
- Ramps rather than steps on approaches to bridges would greatly assist those with disabilities. Where steps are unavoidable, rest or landing areas should be included or there should be signposting to an alternative reasonable route.
- DCAF advises site managers to explore options for facilitating access for Trampler all terrain mobility scooters or making these available for hire, as has been successfully developed by Countryside Mobility South West.
- Routes for cyclists should take into account reclining bikes, trikes and modified bikes as well as Trampler type mobility scooters. These can be longer, lower or wider than a standard bike when navigating a gate or turning space.

### **Planning for better access**

The Forum advises that improvements to Public Rights of Way should incorporate the highest possible access standards from the outset, and that managers should regularly consider potential enhancements. For example, Parish Councils may be planning improvements to Public Rights of Way through Neighbourhood Plans and should consult disabled people on changes. This will ensure costly mistakes that inhibit access are avoided and that people are informed where it is not possible to make an adjustment and improvement. In planning or designing *new* routes the above recommendations should be

considered from the beginning to achieve the highest standards possible. A number of organisations have good practice guides to ensure disability access standards can be implemented.

It is also worth noting that improving access to the countryside isn't necessarily limited to improving paths and gateways. People with limited mobility may have other needs too. There are additional aspects to consider and these include:

- Connectivity (access to the site via accessible public transport, disabled parking bays or safe paths).
- Rest (stopping off points such as picnic tables, pubs, cafes and wheelchair (or mobility scooter) accessible toilets).
- Information (providing clear, easy to read information about the route or site so that people can plan their visit with confidence and consider making information usable by visually sighted and/or Deaf persons)
- Sensory enhancements such as scented plants for visually impaired people. Also, suitable lighting and clear edges to paths in urban areas.

## Legislation

Under the Equality Act 2010, Public Authorities (including County, District, Town and Parish Councils) have a pro-active legal duty to advance equality for disabled people. This includes meeting disabled people's needs. The Act also places a requirement on providers of services to the public to ensure people are not unlawfully discriminated against and that reasonable adjustments are anticipated and made for disabled people. Landowners who have public access or public rights of way across their land are not providers of public services, and therefore cannot be obliged under the Act to make reasonable adjustments, for example by changing a stile to a gate. Landowners who provide permissive access must comply with the Equality Act by considering what reasonable adjustments can be made for disabled people. However, this does not oblige them to put in place anything that would be an unreasonable cost, ineffective or impractical. More information:

<https://www.equalityhumanrights.com/en>

<http://www.legislation.gov.uk/ukpga/2010/15/contents>

<https://new.devon.gov.uk/equality/policy-and-legislation/equality-legislation>

The Department of Transport legislation states that Class 3 mobility scooters must have a maximum speed of 4 mph on pavements and 8 mph on roads, a width of 85 cm and an unladen weight of 150 kg. This class includes Tramper mobility scooters and the TGA 3 wheel Supersport.

<https://www.gov.uk/mobility-scooters-and-powered-wheelchairs-rules/rules-for-class-3-invalid-carriages>



## Best Practice

For photos showing good practice and details of wheelchair and mobility scooter specifications see the DCAF website [www.devon.gov.uk/dcaf](http://www.devon.gov.uk/dcaf)

For more comprehensive information on standards, particularly when establishing a new route, see:

- The Fieldfare Trust – [www.fieldfare.org.uk](http://www.fieldfare.org.uk)  
<http://www.fieldfare.org.uk/countryside-for-all/countryside-for-all-good-practice-guide/>  
This site includes information on the BT Countryside for All project.
- Disabled Ramblers UK - <http://disabledramblers.co.uk/>  
The Disabled Ramblers helps mobility-challenged people get back out into the countryside. Disabled ramblers have several categories of footpath from level 1 for manual wheelchairs to level 3 for off road scooters. Full details are on the website.
- Natural England's Trial of self-closing bridlegates  
<http://publications.naturalengland.org.uk/publication/4580441024102400>  
The summary and conclusions make recommendations for disability access following a trial involving walkers, horse-riders, cyclists, disabled users and landowners.
- Sensory Trust information fact sheets -  
<http://www.sensorytrust.org.uk/information/factsheets/>

For more general information on current initiatives in Devon which benefit disability access see:

- Countryside Mobility SW (tramper buggy hire project)  
<http://www.countrysidemobility.org/>
- Living Options Devon Heritage Ability project - [www.heritageability.org](http://www.heritageability.org)

The Devon Countryside Access Forum is a statutory local access forum set up under the Countryside and Rights of Way Act 2000. Its members are volunteers, appointed by Devon County Council, to provide independent advice on "the improvement of public access to land for the purposes of open-air recreation and enjoyment". The members represent the interests of landowners/land managers, access users and other interests such as tourism and conservation.

5B - MCA/CKW2/R/1/CKW2879 – Weblink to records of near misses and accidents encountered by horse riders on roads

This is data of some of the recorded near misses or accidents riders have encountered while riding on roads. Many drivers believe that horses should not be ridden on the roads, but the dire lack of substantial bridleways in the area forces us to spend more time on the roads. If we have access to more off road riding, the number of near misses or accidents will be significantly reduced.

[https://www.bhs.org.uk/our-work/safety/incident-map?utm\\_source=Facebook&utm\\_medium=social&utm\\_campaign=SocialSignIn](https://www.bhs.org.uk/our-work/safety/incident-map?utm_source=Facebook&utm_medium=social&utm_campaign=SocialSignIn)

## DISABLED RAMBLERS NOTES ON INFRASTRUCTURE

### Useful figures

- **Mobility Vehicles**
  - **Legal Maximum Width of Category 3 mobility vehicles: 85cm** Same width is needed all the way up to pass through any kind of barrier to allow for handlebars, armrests and other bodywork.
  - **Length:** Mobility vehicles vary in length, but **173cm is a guide minimum length.**
- **Gaps** should be 1.1 minimum width on a footpath (BS5709:2018)
- **Pedestrian gates** The minimum clear width should be 1.1m (BS5709:2018)
- **Manoeuvring space** One-way opening gates need more manoeuvring space than two-way opening ones and some mobility vehicles may need a three metre diameter space.
- **The ground** before, through and after any gap or barrier must be flat otherwise the resulting tilt effectively reduces the width

### Infrastructure

Infrastructure on the route of the England Coast Path should be assessed by Natural England for suitability for those with limited mobility, and particularly for those riding large or all-terrain mobility vehicles. The assumption should always be that these individuals will be alone, and will need to stay sitting on their mobility vehicle, ie they will not be accompanied by someone who could open a gate and hold it open for them. The principle of the least restrictive option should always be applied.

- **New infrastructure**

New infrastructure should comply with Bristol Standard with BS 5709: 2018 Gaps, Gates and Stiles.
- **Existing infrastructure**

The creation of the England Coast Path provides a perfect opportunity to improve the trail to make it as accessible as possible. Unsuitable existing infrastructure could be removed now and, where necessary, replaced with new, appropriate infrastructure in line with BS 5709: 2018 Gaps, Gates and Stiles.

### Gaps

A Gap is always the preferred solution for access, and the least restrictive option (BS 5709:2018). The minimum clear width of gaps on footpaths should be 1.1metres (BS 5709:2018).

### Bollards

On a footpath, these should be placed to allow a minimum gap of 1.1metres through which large mobility vehicles can pass.

**Pedestrian gates** A two-way, self-closing gate closing gate with trombone handle and Centrewire EASY LATCH is the easiest to use – if well maintained, and if a simple gap is unacceptable. Yellow handles and EASY LATCH allow greater visibility and assist those with impaired sight too. <https://centrewire.com/products/easy-latch-for-2-way-gate/> One-way opening gates need more manoeuvring space than two-way and some mobility vehicles may need a three metre diameter space to manoeuvre around a one-way gate. The minimum clear width of pedestrian gates should be 1.1metres (BS 5709:2018).

### Field gates

Field gates (sometimes used across roads) are too large and heavy for those with limited mobility to use, so should always be paired with an alternative such as a gap, or pedestrian gate. However if this is not possible, a York 2 in 1 Gate <https://centrewire.com/products/york-2-in-1/> could be an alternative, with a self-closing, two-way opening and yellow handles and EASY LATCH.

## Bristol gates

(Step-over metal gate within a larger gate.) These are a barrier to mobility vehicles, as well as to pushchairs, so should be replaced with an appropriate structure. If space is limited, and a pedestrian gate not possible, a York 2 in 1 Gate <https://centrewire.com/products/york-2-in-1/> could be an alternative, with a self-closing, two way opening, and yellow handle and EASY LATCH for the public access part of the gate.

## Kissing gates

A two-way, self-closing gate is hugely preferable to a kissing gate, but in certain situations a kissing gate might be needed. Many kissing gates can be used by smaller pushchairs and small wheelchairs, but are impassable by mobility scooters and other mobility vehicles. Unless an existing kissing gate has been specifically designed for access by large mobility vehicles, it should be replaced, if possible with a suitable gate (see above). If a kissing gate really must be used, Disabled Ramblers recommend the [Centrewire Woodstock Large Mobility](#) kissing gate, fitted with a RADAR lock, which can be used by those riding mobility vehicles. NB this is the only type kissing gate that is large enough to be used by all-terrain and large mobility vehicles.

### Note about RADAR locks on Kissing gates

Often mobility vehicle riders find RADAR locks difficult to use, so they should only be used if there is not a suitable alternative arrangement. Here are some of the reasons why:

- Rider cannot get off mobility vehicle to reach the lock
- Rider cannot reach lock from mobility vehicle (poor balance, lack of core strength etc)
- Position of lock is in a corner so mobility vehicle cannot come alongside lock to reach it, even at an angle
- RADAR lock has not been well maintained and no longer works properly.
- Not all disabled people realise that a RADAR key will open the lock, and don't know how these kissing gates work. There must be an appropriate, informative, label beside the lock.

## Board walks, Footbridges, Quad bike bridges

All of these structures should be designed to be appropriate for use by large mobility vehicles, be sufficiently wide and strong, and have toe boards (a deck level edge rail) as edge protection. On longer board walks there may also be a need to provide periodic passing places.

## Sleeper bridges

Sleeper bridges are very often 3 sleepers wide, but they need to be at least 4 sleepers wide to allow for use by mobility vehicles.

## Steps

Whenever possible, step free routes should be available to users of mobility vehicles. Existing steps could be replaced, or supplemented at the side, by a slope or ramp. Where this is not possible, an alternative route should be provided. Sometimes this might necessitate a short diversion, regaining the main route a little further on, and this diversion should be signed.

## Cycle chicanes and staggered barriers

Cycle chicanes are, in most instances, impassable by mobility vehicles, in which case they should be replaced with an appropriate structure. Other forms of staggered barriers, such as those used to slow people down before a road, are very often equally impassable, especially for large mobility vehicles.

## Undefined barriers, Motorcycle barriers, A frames, K barriers etc.

Motorcycle barriers are to be avoided. Often they form an intimidating, narrow gap. Frequently put in place to restrict the illegal access of motorcycle users, they should only ever be used after very careful consideration of the measured extent of the motorcycle problem, and after all other solutions have been considered. In some areas existing motorcycle barriers are no longer necessary as there is no longer a motorcycle problem: in these cases the barriers should be removed.



If no alternative is possible, the gap in the barrier should be adjusted to allow riders of large mobility vehicles to pass through. Mobility vehicles can legally be up to 85 cm wide so the gap should be at least this; and the same width should be allowed all the way up from the ground to enable room for handle bars, arm rests and other bodywork. The ground beneath should be level otherwise a greater width is needed. K barriers are often less intimidating and allow for various options to be chosen, such as a shallow squeeze plate which is positioned higher off the ground. <http://www.kbarriers.co.uk/>

### **Stepping stones**

Stepping stones are a barrier to users of mobility vehicles, walkers who are less agile, and families with pushchairs. They should be replaced with a suitable alternative such as a footbridge (which, if not flush with the ground should have appropriate slopes at either end, not steps). If there are good reasons to retain the stepping stones, such as historic reasons, a suitable alternative should be provided nearby, in addition to the stepping stones.

### **Stiles**

Stiles are a barrier to mobility vehicles, walkers who are less agile, and families with pushchairs. They should be replaced with suitable alternative infrastructure. If there are good reasons to retain the stile, such as historic reasons, an alternative to the stile, such as a pedestrian gate, should be provided nearby in addition to the stile.

### **Urban areas and Kerbs**

In urban areas people with reduced mobility may well be using pavement scooters which have low ground clearance. Where the trail follows a footway (eg pavement) it should be sufficiently wide for large mobility vehicles, and free of obstructions. The provision and correct positioning of dropped kerbs at suitable places along the footway is essential. Every time the trail passes over a kerb, a dropped kerb should be provided.

Disabled Ramblers March 2020



Fri 28/02/2020 17:51

[Redacted]

Hallsands & Tinsey Head

To [Redacted]

Message

- access at N end of beach reasonably dry.jpg (243 KB)
- 2020 cracks (4).jpg (390 KB)
- 2020 cracks (3).jpg (267 KB)
- 2020 cracks (2).jpg (366 KB)
- 2020 cracks (1).jpg (245 KB)
- safety fencing around 2020 cracks (2).jpg (126 KB)
- safety fencing around 2020 cracks (1).jpg (158 KB)

[Redacted]

I walked the Coast Path between Hallsands and Beesands this week.

On the positive side, the access at the northern end of Hallsands beach was reasonable; there's still a claggy area, but there was an area inland of this that was relatively dry, and also you could access from the shingle lower down too without going up over your ankles in mud.

On the not so positive side, a new set of cracks has appeared in the path, somewhat north of last year's slump; in fact in the fourth field northwards of Hallsands beach, approaching Tinsey Head.

Although not directly connected with last year's slump area, the cracks' appearance is very similar to how that slump started, so I suspect we are in for a similar development here. Apparently when the NT were out there at the weekend, they were able to get a road pin 750mm or so down into the ground along one of the cracks.

Best wishes,

[Redacted]

Highways and Traffic Management  
Devon County Council  
Tel: 01392 383000  
Email: [prow@devon.gov.uk](mailto:prow@devon.gov.uk)

Access at N end of beach reasonably dry

[Image redacted as not relevant to the representation]

2020 cracks (1)





2020 cracks (2)



2020 cracks (3)





2020 cracks (4)



Safety fencing around 2020 cracks (1)






Safety fencing around 2020 cracks (2)



[Redacted]

FW: Path Survey - cliff fall Tansey Head

[Redacted]

Message  IMG\_20200303\_145054.jpg (8 MB)

Here we go again!

Regards,

[Redacted]

Highways and Traffic Management  
Devon County Council  
Tel: 01392 383000  
Email: [pro@devon.gov.uk](mailto:pro@devon.gov.uk)  
[Privacy Notice](#)

[Redacted]

**Subject:** FW: Path Survey - cliff fall Tansey Head

Hi All

Email from [Redacted] has been further movement and it needs fencing off again urgently!

More to add to the jobs list

[Redacted]

South Devon Coast and Countryside  
01548 562344 or 07824521953  
'Like' our Facebook page: National Trust South Devon Countryside  
#NTNature or visit: [www.nationaltrust.org.uk/nature](http://www.nationaltrust.org.uk/nature)



[Redacted]

**Subject:** Path Survey - cliff fall Tansey Head

Hi [Redacted]

I am sure you are aware of this. I did my survey last week and noticed that cracks are appearing in the path outside of the area fenced off. I assume this is a temporary fence and that you will be installing a stock-proof fence in the near future.

People were walking around the fenced area but there is the potential of them walking up to the fence line and putting themselves in danger. (notice the post has fallen in the movement too, I think.

I expect you are monitoring the situation but thought I should mention it.

When do you hope to establish a more permanent fence?

[Redacted]

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