

Coastal Access – Calshot to Gosport, length CCG3



Representations with Natural England's comments

January 2020

1. Introduction

This document records the representations Natural England has received on length CCG3 of this report 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 Calshot to Gosport they are included here in so far as they are relevant to length CCG3.

2. Background

Natural England's compendium of reports setting out its proposals for improved access to the coast from Calshot to Gosport, comprising an overview and three separate length reports, was submitted to the Secretary of State on 11 July 2019. This began an eight-week period during which representations and objections about each constituent report could be made.

In total, Natural England received 10 representations pertaining to length report CCG3 of the Calshot to Gosport stretch, of which seven 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 3 in their entirety, together with Natural England's comments. Included in Section 4 is a summary of the three representations made by other individuals or organisations, referred to as 'other' representations. Section 5 contains the supporting documents referenced in the representations.

3. Record of ‘full’ representations and Natural England’s comments on them

Representation number:	MCA/CCG Stretch/R/1/CCG1626
Organisation/ person making representation:	<p>The Solent Recreation Mitigation Partnership (<i>Bird Aware Solent</i>)</p> <p>The Solent Recreation Mitigation Partnership is a partnership comprising of the fifteen Solent local authorities (some of whom are themselves in the “full” category as Access Authorities), Natural England, the Royal Society for the Protection of Birds, the Hampshire & Isle of Wight Wildlife Trust, and Chichester Harbour Conservancy. The Partnership for Urban South Hampshire (from 1st August 2019 known as the Partnership for South Hampshire) provide political governance for the Solent Recreation Mitigation Partnership. This response is submitted with their support and backing.</p>
Route section(s) specific to this representation:	Maps CCG 3a to CCG 3f and Directions Maps 3A and 3B
Other reports within stretch to which this representation also relates:	CCG 1 and CCG 2
Representation in full	
<p>As representatives of the SRMP partnership, we welcome the concept of the England Coast Path as something of value to local people and residents, but we have some real concerns that we would like addressing.</p> <p>We recognise and thank you for your timely and inclusive approach to engaging with us during the development of a route for the England Coast Path. As you are aware those parts of the Solent being identified as a potential route for the England Coast Path are covered also by our mitigation programme, identified in our Strategy which was formally adopted by PUSH in December 2017 and replaces the interim Strategy we had been operating under since 2014.</p> <p>We acknowledge the England Coast Path team have consulted with us and hope that the England Coast Path team have benefitted from SRMP partners’ local knowledge and ecological expertise. We understand that this input has formed part of the evidence to define a route which does not lead to additional impacts on the Solent’s SPA birds and their habitats. We appreciate that the proposed England Coast Path route will need to satisfy the Habitats Regulations and that avoidance and mitigation may be required for the chosen route. This is in the same way that SRMP is a response to allowing development to proceed in satisfaction of those same regulations.</p> <p>There are two specific areas of concern that have been expressed by partners that could potentially create conflict between the objectives of the two initiatives, outlined below.</p>	

Increased Visitor Numbers

Partners have expressed concerns that the England Coast Path will lead to a rise in the number of visitors to sensitive parts of the coast. This will cause increased disturbance to the overwintering birds that journey to our SPAs, many of which are red and amber listed.

Whilst the SRMP is employing a range of measures to mitigate against disturbance from increasing housing numbers, it does not have the resources to deal with any further elevation in visitor numbers as a result of the England Coast Path. Therefore there is a real concern of a conflict between these two initiatives. Any rise in visitor numbers as a result of England Coast Path use has the potential to diminish the effectiveness of the SRMP measures. England Coast Path will need to ensure that it provides its own mitigation package to protect against the impact of increased visitor numbers it will create.

Mapping of Spreading Zone

It is understood that in some areas of the England Coast Path the spreading zone will be excepted for reasons of safety or nature conservation. Concern is raised about Ordnance Survey's plans for depicting the 'spreading zone' as a magenta wash and not making any exceptions for excepted areas.

As such, to an England Coast Path user carrying an Ordnance Survey map it will appear that they are free/encouraged to walk on intertidal areas. In large parts of the SRMP area, these can be extremely large, support fragile habitats and be a huge food resource for birds and other species. Increased footfall through these areas would cause great damage to these fragile habitats and enormous disturbance to vulnerable wintering bird populations.

Whilst it is understood that exceptions to the spreading zone will be sign posted on the ground and listed on Natural England's website, enforcement of these would seem to fall to the landowner/occupier. If it is not possible to depict the spreading zone for the England Coast Path accurately on Ordnance Survey maps, we would urge Natural England to reconsider its inclusion on the map entirely.

We are therefore seeking assurance from you about these two concerns in particular, rather than the more general issues you are already aware of and will be incorporating into the Access & Sensitive Features Appraisal

Natural England's comments

Increased visitor numbers

We understand the disturbance pressure affecting the Solent SPAs as a result of increasing demand for places to recreate from a growing population. Improving provision for walking, and particularly high quality, well maintained and promoted routes is one of a number of positive ways of managing demand.

Natural England maintains that over the course of developing our proposals for England Coast Path between Calshot and Gosport we have thought carefully about possible impacts on the European sites and their associated designated features that could be affected. We have taken an iterative approach to developing and refining our access proposals, including thorough discussion with the SRMP and other organisations with relevant local knowledge, and are satisfied that sufficient measures are included to mitigate the risks. After careful

consideration, we believe that the proposals we have made will not be likely to have a significant effect on a European sites that gives rise to the real risk of an adverse effect on its overall integrity. In reaching this conclusion, we have taken account of the relevant conservation objectives for the European sites involved and their ecological characteristics.

Our Habitats Regulations Assessment (see page 29, 'Bird Aware Solent', under 'D2. Contextual statement on the current status, influences, management and condition of the European Site and those qualifying features affected by the plan or project') states that:

“Proposals for coastal access have been made following a series of workshops and discussions with Bird Aware Solent representatives during which we have checked that detailed design of the access proposals is compatible with the Solent Recreation Mitigation Strategy and latest thinking on how it will be delivered, including site-specific infrastructure and awareness raising measures.”

Our programme to establish the England Coast Path is complementary to the Partnership's strategy; it seeks to enable responsible access to the Solent coast and inform visitors about the ecological sensitivities. Through meetings and a series of workshops we have developed our proposals in close liaison with Bird Aware Solent and have fully considered the Bird Aware Solent evidence base and both the interim and definitive mitigation strategy. A key feature of the Bird Aware Solent strategy is the provision of coastal rangers to educate and inform coastal visitors about the wintering bird sensitivities and how to enjoy the site, whilst avoiding disturbing the feeding and roosting birds. Our proposals for the alignment and detailed design of the Coast Path complement the work of the rangers. The definitive strategy aims to widen the range of mitigation from the interim strategy through providing on-the-ground access management projects specific to each site, including measures such as interpretation panels. Although a definitive list of these projects has yet to be finalised, Bird Aware Solent and Natural England colleagues have liaised to identify the likely projects that would be effective to reduce recreational disturbance in the Solent based on evidence.

Representatives of the England Coast Path team have provided updates on the proposals to Bird Aware Solent meetings. These sessions have generated useful feedback which we have used in developing our proposals. This document has been developed in consultation with Natural England's staff involved in Bird Aware Solent.

Ongoing maintenance of the path and the associated mitigation measures have been considered within the Overview and individual reports for the stretch.

Mapping of Spreading Zone

How coastal margin is to be mapped on the OS maps does not form part of our proposals.

The decision as to how to depict on OS 1:25,000 maps the England Coast Path and the 'coastal margin' created on approved stretches by the Access to the Countryside (Coastal Margin) (England) Order 2010 resulted from detailed discussions with the Coastal Access National Stakeholder Group. This group, representing a balance of interests including user, conservation and land manager representative organisations, considered it imperative that the

route of the England Coast Path and the coastal margin should both be depicted. This decision reflected the importance afforded by the stakeholder group to acknowledge the statutory duty to establish both a 'long distance walking route' around the coast of England and to identify a margin of land within which the public will also have access, subject to what follows.

Coastal margin will generally have, as a large component, land which is subject to coastal access rights but in some areas contains much land which is not subject to these rights. This may be because either it is excepted land, as set out in Schedule 1 of CROW, or because it is subject to statutory restriction.

It follows that, in contrast to the position with CROW 'open access land', the depiction of coastal margin on OS maps is not a depiction of 'access land' per se, but a depiction of the status of the land, rather as national park boundaries are depicted on the maps. This distinction was central to the decision to depict coastal margin distinctively on OS maps.

The depiction of coastal margin on OS digital and paper products with a magenta wash comes with a clear, concise explanation in the key: "All land within the 'coastal margin' (where it already exists) is associated with the England Coast Path and is by default access land, but in some areas it contains land not subject to access rights - for example cropped land, buildings and their curtilage, gardens and land subject to local restrictions including many areas of saltmarsh and flat that are not suitable for public access. The coastal margin is often steep, unstable and not readily accessible. Please take careful note of conditions and local signage on the ground"

The key also gives the link to the National Trails website <http://www.nationaltrail.co.uk/> which is the official source for information on the England Coast Path.

The new coastal access arrangements bring greater clarity on the ground about the rights of public access to coastal land.

It is in the interest of all parties that information regarding these new rights and about the new coastal margin designation is depicted accurately and consistently on OS maps, with appropriate explanation.

This approach to depicting the England Coast Path and coastal margin on OS maps has been in use since 2014. Natural England is unaware of any issues that have resulted in practice from this approach. This is despite the inclusion of some very substantial areas of developed or other excepted land with the magenta wash – for example:

- On the Isle of Portland, because of the need for the approved route of the England Coast Path to cut across the north east corner of the island, the mapped coastal margin includes Portland Port, the Verne prison, houses, other buildings and their curtilage.
- On the Tees estuary, the coastal margin comprises extensive areas of industry and business interspersed with brownfield sites and areas where access rights are excluded to protect wintering birds

Relevant appended documents (see section 5): n/a

Representation number:

MCA/CCG Stretch/R/2/CCG0019

Organisation/ person making representation:	[Redacted] on behalf of The Ramblers
Route section(s) specific to this representation:	CCG 3 whole report
Other reports within stretch to which this representation also relates:	CCG 1 and CCG 2
Representation in full	
<p>The Hampshire Ramblers are pleased to have been consulted during the process of developing proposals for the Calshot to Gosport stretch of the England Coast Path. Unlike many 'consultations' that we are invited to take part in we believe that on this occasion there has been genuine interest in our points of view, even if it has not always been possible to accommodate them.</p> <p>Our major Representations on this section are generally well-known to NE, but we nevertheless wish to put them on record.</p>	
Natural England's comments	
<p>Natural England welcome the Ramblers support for the proposed route alignment at the above locations.</p>	
Relevant appended documents (see section 5): n/a	

Representation number:	MCA/CCG Stretch/R/3/CCG0019
Organisation/ person making representation:	[Redacted] on behalf of The Ramblers
Route section(s) specific to this representation:	CCG 3 whole report
Other reports within stretch to which this representation also relates:	CCG 1 and CCG 2
Representation in full	
<p>We note that in the text of the reports under 'Establishing the Trail' there are commitments for waymarking the Trail. Whilst walking the proposed route and using the published mapping we noted a number of locations where clear new signage is vital. This is particularly the case at a number of locations on the Calshot to Itchen Bridge section. In due course we wish to be involved with the details of signing the route.</p>	
Natural England's comments	
<p>We recognise the Ramblers' local knowledge and believe that the clarity & usability of the trail would benefit from continued liaison with this group during the establishment phase.</p> <p>Our report proposes a number of interpretation panels and also commits us to properly signing new sections of path. The proposed general location of the interpretation panels are shown on the reports maps but we would appreciate the Ramblers' input when determining the precise installation locations of these panels and other waymarkers.</p>	

Relevant appended documents (see section 5): n/a

Representation number:	MCA/CCG Stretch/R/4/CCG1650
Organisation/ person making representation:	Hampshire Countryside Access Forum
Route section(s) specific to this representation:	CCG 3 whole report
Other reports within stretch to which this representation also relates:	CCG 1 and CCG 2
Representation in full	
<p>HCAF has welcomed the excellent communications maintained by Natural England during the process of developing proposals for the Southampton Town Quay to Gosport stretch of the England Coast Path. (The section from Calshot to the Hythe Ferry is covered by the New Forest Access Forum).</p> <p>HCAF believes that the consultation process has been very effective and should stand as an example to others.</p> <p>During this process our discussions have frequently turned to the two areas where HCAF have some concerns, therefore our Representations are expected to be familiar to Natural England.</p>	
Natural England's comments	
<p>Natural England welcome and are grateful for the HCAF's support during the development of our proposals.</p>	
Relevant appended documents (see section 5): n/a	

Representation number:	MCA/CCG3/R/5/CCG1650
Organisation/ person making representation:	Hampshire Countryside Access Forum
Route section(s) specific to this representation:	Solent Breezes Holiday Village, section CCG-3-S019 to S033 - Map 3c
Other reports within stretch to which this representation also relates:	n/a
Representation in full	
<p>The consideration given to different options concerning the section around Solent Breezes from CCG-3- 019 FP to the western end of - 033 is noted.</p> <p>The England Coast Path proposal here provides no improvement to the existing unsatisfactory situation. Walkers are expected to use a section of very busy access road,</p>	

S025, with no pavement or other provision for pedestrians. The section between the north end of S028 and the western end of S033 can be particularly muddy and difficult during winter months. The report states that the horse field tenants would not like to have a path reducing the amount of grazing available for their animals. However, HCAF believes that it ought to be possible to devise an alternative route that significantly reduces the length of the route not on the coast and that does not create a serious impact to the paddocks

Natural England’s comments

This is a complex area within the stretch and several alignment options were considered during development of our proposals. After several site visits and much discussion with relevant landowners it was determined that the proposed route struck the best balance between private and public interests.

Site visits to Chilling Lane demonstrated that vehicles are slowed by ‘15mph’ signage in addition to several speed bumps along the lane. The length of the site lines and the width of the Chilling Lane here are considered adequate for walkers and vehicles to safely pass. Some verges are present to provide refuge from the traffic. No concerns over use of this route were raised during discussions with the access authority. This route is currently part of the promoted “Solent Way”.

Sections CCG-3-S026 to CCG-3-S031, when travelling eastwards, return walkers quickly to a coastal route along a well used and popular route. Our proposals align around the edge of the field at S030 and S031. At site visits (including one in November) we did not consider this area as likely to become muddy to such an extent that infrastructure or resurfacing would be required. No user groups or other people reported this as being a problem.

Routes both seawards and landwards of Chilling Lane were explored. Northwards the ground is very boggy and not appropriate for a pathway.

A southerly alignment departing from Chilling Lane at CCG-3-S024 and running along the northern boundary of the holiday village was discounted as it descended into lower boggy ground and would need to cross a wide creek. This would require significant infrastructure and maintenance costs but would provide little extra recreational value as the route would give no coastal views. Privacy impacts were also raised about running the footpath adjacent to the rear of the holiday homes that open on to the fields.

As stated in the report, discussions were held with the tenants about a stock-proof fenced ‘channel’ for walkers adjacent to the road. The tenants felt this would greatly reduce the area available for grazing horses and bring the horses in to more direct contact with the public. Several gates would also be needed to cross the various pens within the fields.

We would have liked to have seen an improvement to the existing access arrangements in this area, but for the reasons set out above and in our report it was not possible.

Relevant appended documents (see section 5): n/a

Representation number:	MCA/CCG3/R/3/CCG0019
Organisation/ person making representation:	The Ramblers

Route section(s) specific to this representation:	Solent Breezes Holiday Village, section CCG-3-S019 to S033 - Map 3c
Other reports within stretch to which this representation also relates:	n/a
Representation in full	
<p>The consideration given to different options concerning the section around Solent Breezes from CCG-3-S019 FP to the western end of -S033 is noted. The proposal here provides no improvement to the existing dire situation. Walkers are expected to use a section of remarkably busy access road, S025, with no pavement or other provision for pedestrians. The section between the north end of S028 and the western end of S033 can be particularly muddy and difficult during winter months. The report states that the horse field tenants would not like to have a path reducing the amount of grazing available for their animals. However, this route is walked by thousands and the potential benefits of any improvement here outweigh the detriment to a very small group. We would strongly encourage NE to at least reconsider a route avoiding the busy access road by using a path through the western edge of the paddocks. This would have the added benefit of reducing the distance walked away from the coast.</p>	
Natural England's comments	
Please refer to our comments to representation MCA/CCG3/R/5/CCG1650 from the Hampshire Countryside Access Forum.	
Relevant appended documents (see section 5): n/a	

Representation number:	MCA/CCG3/R/2/CCG0016
Organisation/ person making representation:	The Open Spaces Society
Route section(s) specific to this representation:	Map CCG 3a
Other reports within stretch to which this representation also relates:	Use of the ferry service is covered in CCG 2 but this representation was only submitted in relation to CCG 3
Representation in full	
<p>The Open Spaces Society considers that the England Coast Path should cross the River Hamble not by the Hamble-Warsash (Pink) ferry as proposed, but by the A27 road-bridge crossing, with the path extended up both sides of the Hamble estuary to the A27. This was option 1.</p> <p>We submit that the ferry is uncertain and unreliable, with no timetable (relying on passengers using a mobile phone to call it up); it is inaccessible several times a year due to high tides; it cannot operate in all weather conditions; it is difficult to gain access to it, and it is not viable financially during the winter. We therefore believe that it is unsuitable as the sole means of crossing the Hamble estuary.</p>	

The A27 road bridge has a wide footway on both sides of the road; it is reliable and permanent. This would result in an attractive path on both sides of the Hamble, through pleasant and interesting places with an opportunity to enjoy the rich birdlife here. The Hamble River Valley Forum has identified such a route. Of course, the ferry remains an option, when it is available, for those who wish to use it.

Natural England's comments

Several representations on a similar theme were received for Report CCG 2.

Natural England's approach to rivers and estuaries is generally to use the first reliable crossing point, be it a bridge or ferry. Our approach is covered in detail under Chapter 10 of the Coastal Access Approved Scheme ("the Scheme"). It is at our discretion whether we propose to carry on up a river to the first crossing point or use a ferry and we always give careful consideration over which option we propose. In this circumstance we took in to account whether the cost of extending the trail to the first public bridge would be proportionate to the extra public enjoyment of the coast that would result. As per section 10.1.16 of the Scheme we decided that this would not be the case due to the extent of diversion that would be necessary: to achieve a fair balance between private and public interests, to avoid large areas of excepted land and environmentally sensitive sites and the fact there is a ferry downstream of the bridge. The following covers this in more detail.

As per section 10.3 of the Scheme, the existence of a ferry service is an important factor in our decision over how to cross an estuary. We proposed using the Hamble Ferry as conversations with the ferry operator and owner, [redacted], evidenced that the ferry runs year round (except Christmas day) and has only had a very small number of non-service hours in past years, due to either mechanical breakdown or storms with sustained winds of force 6 and above. The Ferry Operating hours are: Summer 09.00 - 18.00 and Winter 09.00 - 16.00 daily. The operator is very happy to promote the ferry service as part of the England Coast Path and refutes the claims the ferry service is not reliable.

Should the ferry cease to run or reduce its service then we would look at the alternatives to provide a continuous route and submit a variation report.

Aside from the fact there is a regular ferry, any route up and down the river would involve significant inland diversions away from the coast to avoid excepted land (buildings, gardens and their curtilage, a railway line, boat yards and marinas). During early dialogue with landowners and those with a legal interest, concerns were raised over the potential impacts of a route up the river such as the creation of coastal margin and any subsequent spreading room. Our decision to use the ferry was supported by those landowners.

The River Hamble is covered by the Solent and Southampton Water Ramsar, Solent and Southampton Water Special Protection Area, Solent Maritime Special Area of Conservation and the Lee-on-the-Solent to Itchen Estuary SSSI. Any route up river would need to take in to account the notified features of these sites. Our initial assessments and consultation suggested that due to the sensitivity of the bird features and the saltmarsh, mudflats and creeks on the western side of the river, it would be necessary to divert away from the coast in several locations and/or use other mitigation measures to prevent any likely significant effects on the features.

The Solent Recreation Mitigation Partnership, The Wildlife Trust and Natural England site officers had concerns about increased disturbance to over wintering and breeding birds through routing the England Coast Path up the river. On the eastern side of the river for example, where there is already a riverside PRow. That path and its use is evidenced as creating serious disturbance issues and due to concerns over an increase in use by becoming part of the England Coast Path and the possible impact of coastal margin/spreading room we decided not to propose it as part of the England Coast Path.

Based on our investigations during Stage 2, any route up river would likely predominantly use existing access with no new routes closer to the coast. The only new access rights created would likely be over agricultural land. We also estimated 250-300 new legal interests affected, a need for public safety, land management and nature conservation directions to restrict access thus limiting any spreading room and significant infrastructure works on the eastern side.

We also took in to account the cost of aligning, reporting and then opening and maintaining a new national trail and how that would place an increased responsibility on Hampshire County Council as the access authority.

Relevant appended documents (see section 5):

England Coast Path, Calshot to Gosport, representation by Hamble River Valley Forum, August 2019 at 5.1

4. Summary of ‘other’ representations making non-common points, and Natural England’s comments on them

Representation ID:	MCA/CCG Stretch/R/5/CCG1619
Organisation/ person making representation:	Solent Protection Society
Name of site:	CCG 3 whole report
Report map reference:	Maps 3a to 3f
Route sections on or adjacent to the land:	
Other reports within stretch to which this representation also relates	CCG 1 and CCG 2
Summary of representation:	
The Society supports the proposals and is pleased with the links that have been proposed to join up various sections of path and create a more continuous route. It hopes that Natural England will monitor options for improvements to the trail at Fawley oil refinery should circumstances change. The small detours required on the eastern shore of Southampton Water at Netley and the Holiday Park are a pity.	

<p>SPS accepts that the best of the three options has been chosen at the three estuary crossings.</p> <p>Finally SPS supports the proposed S25A directions proposed throughout the report to exclude the public from the seaward coastal margin.</p> <p>The Society hopes that adequate signage is installed along the route to inform the public of the exclusions and that in critical areas fencing is proposed to physically restrict public and particularly dog access.</p> <p>This will be important if the proposed Fawley Waterside development takes place which will put increased pressure on the path and its margins at the south west corner. However the Society stresses that they strongly support the path going on the seaward side of the proposed development.</p>
<p>Natural England's comment:</p> <p>Natural England acknowledge these comments in response to our stretch proposals, and are grateful for the statements of support. With regards to signage we have proposed to install interpretation panels to inform users of the local environmental sensitivities and where appropriate use of fencing to guide walkers and dogs away from the most sensitive areas.</p>
<p>Relevant appended documents (see Section 5): n/a</p>

Representation ID:	MCA/CCG3/R/1/CCG1651
Organisation/ person making representation:	Private individual
Name of site:	Titchfield/Hill Head
Report map reference:	map 3e
Route sections on or adjacent to the land:	CCG-3-SO67 and CCG-3-S068
Other reports within stretch to which this representation also relates	n/a
Summary of representation:	As a beach hut owner [redacted] would like a dogs on leads restriction along the promenade as currently dogs are allowed to run free. This sometimes causes problems with dogs snatching food, urinating against seats and defecating on the beach.
Natural England's comment:	

We do not agree that a direction to restrict dogs to leads is necessary on these sections of coast. This area is already available to the public and has high levels of use. Under the coastal access legislation a person who brings a dog with them must keep it under “effective control”, which means they must: keep the dog on a lead; or keep it within sight, remain aware of its actions and have reason to be confident that the dog will return reliably and promptly to them on command; and in either case, keep the dog on land with coastal access rights or other land to which the person has a right of access. We believe that this is sufficient in these circumstances.

Relevant appended documents (see Section 5): n/a

Representation ID:	MCA/CCG3/R/4/CCG0008
Organisation/ person making representation:	The Disabled Ramblers
Name of site:	CCG 3 whole report
Report map reference:	Maps 3b, 3c, 3d and 3e
Route sections on or adjacent to the land:	
Other reports within stretch to which this representation also relates	CCG 1 and CCG 2
Summary of representation:	
<p>The Disabled Ramblers is concerned that the accessibility statement 3.2.8 and 3.2.9 in Report CCG 3 has not recognised that there is a significant and increasing number of people with reduced mobility using various mobility vehicles to enjoy routes on more rugged terrain.</p> <p>They request that NE takes all reasonable steps to make the trail as easy as possible for disabled people and those with reduced mobility and be mindful of British Standard BS5709:2018 Gaps Gates and Stiles and reconsider suitability of existing infrastructure indicated as being retained because in many cases this bars legitimate access for this group of people.</p>	
Natural England’s comment:	
<p>Section 4.3 of the Scheme – ‘Adjustments for disabled people and others with reduced mobility’ guides our approach to aligning the trail to ensure that it is as inclusive as possible.</p> <p><i>“4.3.8 We follow the principles set out in our publication “By All Reasonable Means” to make the trail as easy to use as we reasonably can for disabled people and others with reduced mobility, whilst accepting that such opportunities will often be constrained by practical limitations, such as the rugged nature of the terrain or the availability of visitor transport and facilities (see section below). Where there is a choice of routes (after taking into account all the key principles in chapters 4 and 5 of the Scheme), we favour the one that is accessible to the widest range of people or most easily adapted for that purpose.</i></p>	

4.3.9 Throughout the trail, we avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances. For example, where we install infrastructure in preparation for the introduction of the rights (or replace existing infrastructure, once it has reached the end of its useful life) we normally use:

- gaps to cross field boundaries where livestock control is not an issue;
- gates rather than stiles where livestock will be present, designed to enable access by people with wheelchairs; and
- graded slopes rather than steps if practicable.

4.3.10 Where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility. This may include improvements to the information available about those lengths of trail that are already accessible to a wide range of people. We also ask local representatives to help us identify, prioritise and design suitable and affordable physical improvements to the trail according to their local needs and the available budget. They might typically identify:

- particular sections of trail that are well-served by public transport and visitor facilities, but have physical barriers to access for people with reduced mobility which could realistically be removed; or
- sections with potential to provide key strategic links through adjustments that are readily achievable.

4.3.11 In all this, we will have regard to any concerns about making it easier in practice for people to enter land unlawfully with vehicles; the importance of conserving cultural heritage features and landscape character in the design of the trail and infrastructure; land management needs, for example the need for crossing points to be designed to prevent livestock from escaping; the costs involved; and the need for crossing points between fields to facilitate access for horse riding or cycling where there are existing rights or permissions for these activities.”

Our proposals for CCG 3 include two locations where the new or retained infrastructure may restrict access to those with reduced mobility:

- A bridge retained at CCG-3-S037. This is in a remote location with narrow paths to and from the bridge across sand and shingle. There is an ascent/descent through dunes/cliff east of the bridge.
- New barriers at CCG-3-S044 - railings along the cliff edge being added for safety reasons given the proximity to the cliff edge at this narrow section. However access to and from this section of the path is along a narrow, steep incline.

In drawing up our proposals we have taken all reasonable steps to make the trail as easy as possible for disabled people and those with reduced mobility and been mindful of British Standard BS5709:2018 Gaps Gates and Stiles. In certain places we have been able to make targeted adjustments to make the trail more accessible for people with reduced mobility:

- At Chilling Lane (CCG-3-S028) we have removed a barrier (wooden post and rail) and replaced with a single waymarker bollard and some surfacing work.
- For example at certain locations, such as CCG-3-S033 & CCG-3-S035 we shall be resurfacing the existing path which would enable users with reduced mobility to better use the route.

Relevant appended documents (see Section 5):

The Disabled Ramblers photos; see 5.2

5. Supporting documents

5.1 Open Spaces Society MCA/CCG3/R/2/CCG0016

Hamble River Valley Forum map of suggested alignment – West and East side of River Hamble



*Riverside walk up the Hamble River estuary
from Warsash towards Swanwick & Bursledon*

England Coast Path

Calshot to Gosport

REPRESENTATION BY
HAMBLE RIVER VALLEY FORUM
August 2019

- The Hamble River Valley Forum (HRVF) is a partnership of local Parish and Town Councils in the Hamble River Valley. It enables the councils to work together with user groups such as river users, ramblers and the public to improve and protect the river and its valley.
- In 2016 in response to representatives of Natural England (NE) seeking local groups views on the route of the England Coast Path the HRVF made a presentation regarding reasons for the route to include the Hamble River estuary.

HRVF stated that for the England Coast Path to be a permanent asset for the future it must use the A27 Road Bridge and not the Hamble-Warsash Ferry as the first crossing point of the Hamble River.

The main reasons were:

The Hamble River estuary is an important part of the coast and is one of the country's leading boating and recreational centres, therefore it should be included in the England Coast Path. It would provide enormous recreational benefits by providing improved coastal access for the public to enjoy sites and scenes on the route, including the cultural and heritage benefits of the villages on the Hamble peninsula. It would be an added attraction for visitors and tourists that would be beneficial to them and local businesses.

The Hamble-Warsash Ferry operates limited hours, most of the year 9am-4pm, therefore much of the day (especially for people who are working) the England Coast Path would not be able to be used. Due to weather conditions, extremely high tides and essential holidays such as Christmas it cannot guarantee to be operating.

The Gosport ferry is one of the best ferries on this area of the coast, with long operating hours, but the England Coast Path does not use it as the first crossing point and provides a route around Portsmouth Harbour. HRVF welcomed and supported NE provision of a path around Portsmouth Harbour for walkers to enjoy and said that the Hamble River estuary should have the same to ensure there is no gap in the England Coast Path at any time.

- The current request for comments on the proposals for the England Coast Path Calshot to Gosport, HRVF submits the following representation. HRVF has not changed its view that Option 1 on page 21 of 'Calshot to Gosport Overview' is its preferred option but acknowledges the decision for Option 2 in the report.

If Option 2 is taken forward it is essential that an 'Alternative Route' is provided via the A27 Road Bridge following existing riverside footpaths/ROWs and the 'Strawberry Trail' for when the Hamble- Warsash Ferry is not available. A similar alternative route has been provided at Netley for when on a few occasions each year there is an extremely high tide.

The Hamble-Warsash Ferry operates limited hours (9am-4pm Monday to Friday and 8am to 5pm summer weekends) and the service is subject weather permitting it is safe to run. Most times of the year the England Coast Path outside of the hours 9am-4pm would not be accessible to walkers and the public.

An 'Alternative Route' is required to ensure the England Coast Path can be used at all times and to avoid long waits when the ferry is not operating. No matter what information is provided about the ferry's operational hours some people using the England Coast Path will be caught out and stranded to their great disappointment.

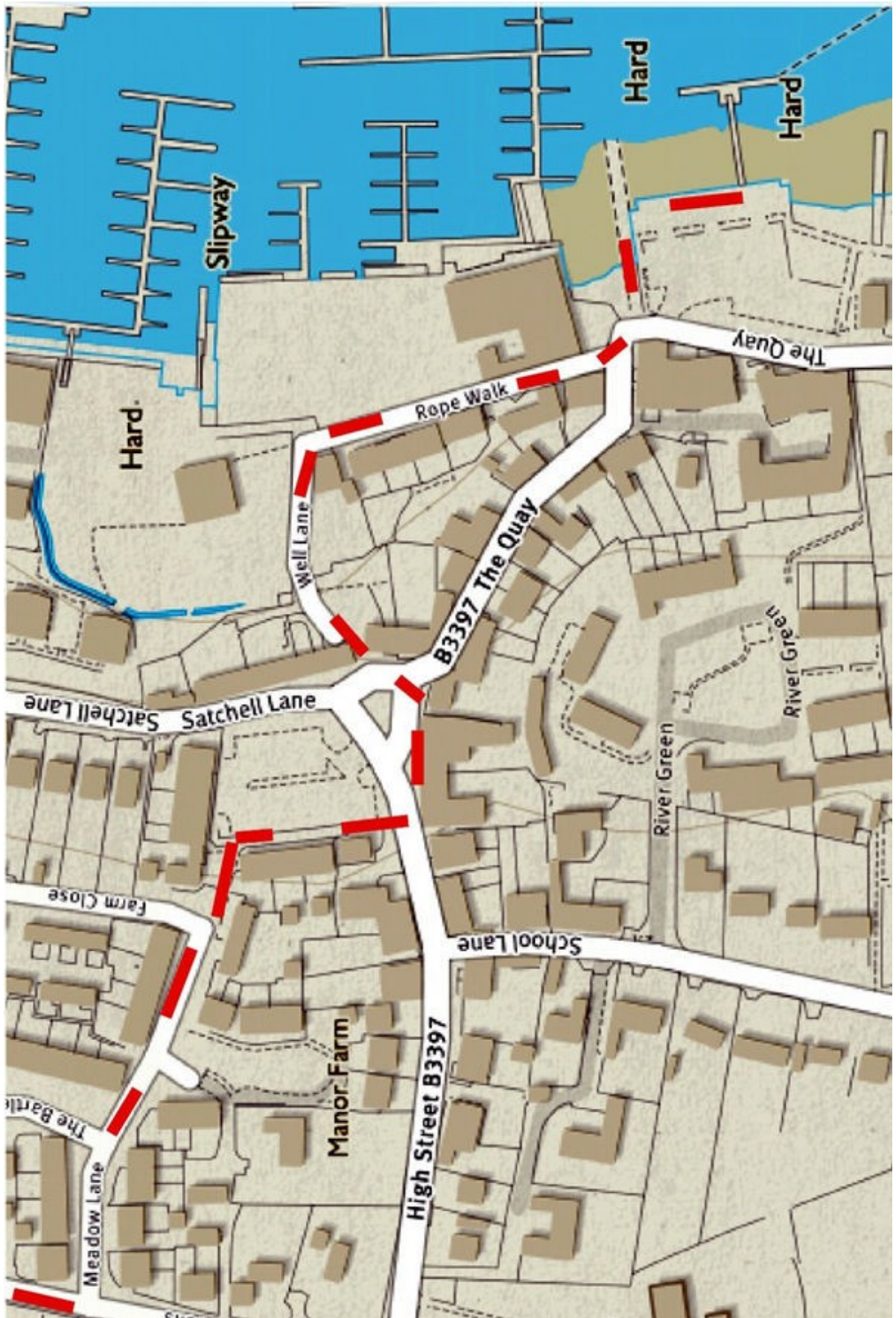
The Hamble River estuary is important nationally and is a significant part of the coast and providing an 'Alternative Route' would provide an opportunity to improve coastal access and recreational benefits. This is particularly important to walkers, tourists and future visitors of the area.

An 'Alternative Route' would enable visitors and tourists to use Bursledon station as a rail link to the Calshot to Gosport section of the path. The only other rail link is in urban Southampton.

An 'Alternative Route' would also reduce the need for a variance report in the future.

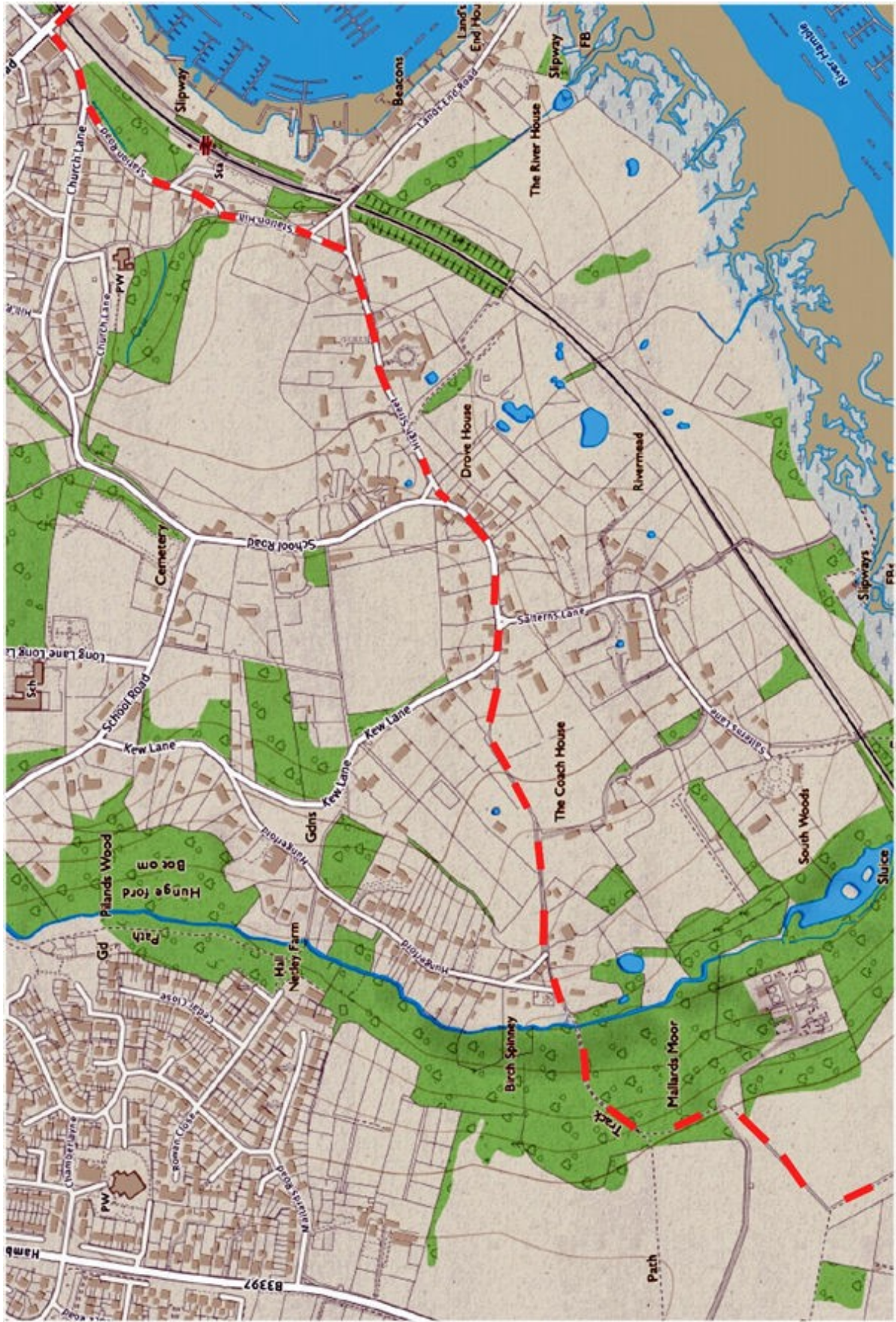
So as not to give NE any extra work, HRVF submits an 'Alternative Route' using the existing riverside walk on the east side of the river and the 'Strawberry Trail' that runs parallel to the river from Hamble to Bursledon.

HRVF hopes in the future opportunities can be taken to make the path on the west side closer to the river and extend above the A27 road bridge to Botley.

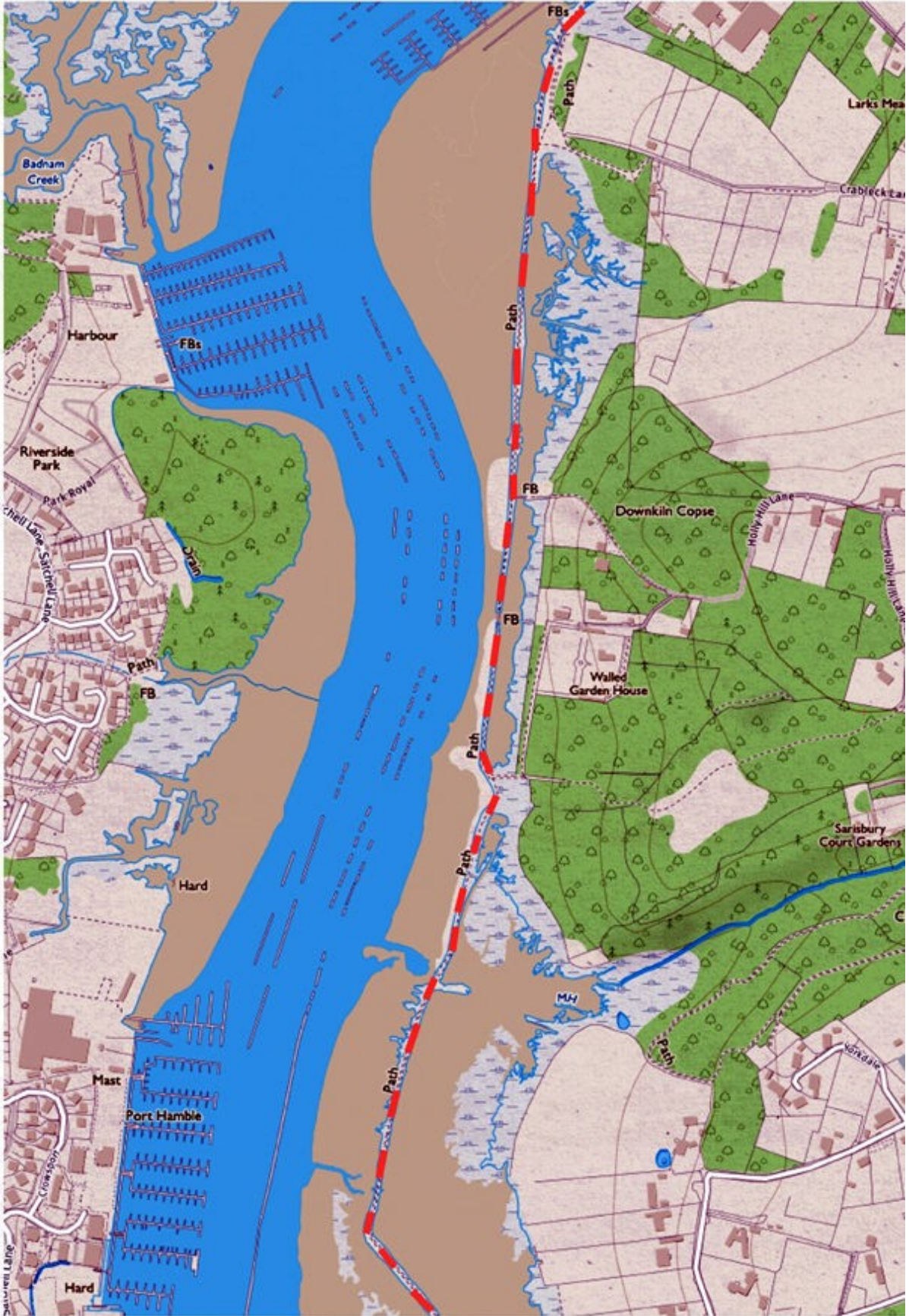














5.2 The Disabled Ramblers Photos – MCA/CCG3/R/4/CCG008

Note that additional supplementary material (photos of The Disabled Ramblers on a number of different terrains) submitted with this representation has been redacted from this record due to containing personal information.