

Coastal Access – Gosport to Portsmouth lengths GPM1, GPM2, GPM4 and GPM5



Representations with Natural England's comments

January 2020

1. Introduction

This document records the representations Natural England has received on the proposals in length reports GPM1, GPM2, GPM4 and GPM5 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 Gosport to Portsmouth they are included here in so far as they are relevant to lengths GPM1, GPM2, GPM4 and GPM5.

2. Background

Natural England's compendium of reports setting out its proposals for improved access to the coast from Gosport to Portsmouth, comprising an overview and five separate length reports, was submitted to the Secretary of State on 1 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 twenty-one representations pertaining to length reports GPM1, GPM2, GPM4 and GPM5, of which seventeen 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. Also included in Section 4 is a summary of the four representations made by other individuals or organisations, referred to as 'other' representations.

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

Representation number:	MCA/GPM1/R/3/GPM0019
Organisation/ person making representation:	[redacted] The Ramblers Association
Route section(s) specific to this representation:	GPM-1-S010 to GPM-1-S017
Other reports within stretch to which this representation also relates:	N/A
Representation in full	
<p>Browndown Training Area, two comments –</p> <p>a) The coastal area from GPM-1-S010 to S017 is a military training area in periodic use, at other times open to the general public. A reasonable route, without much walking on shingle, exists in this training area following a track. We note the entry in table 1.2.7, but believe that with appropriate measures, particularly to manage dogs, this much more pleasant alternative to the pavement route should be drawn to the public’s attention when the ranges are not in use. Military notices at the ends of this path invite responsible public access, but do not make clear the existence of a through route. It is also noted that local dog-walkers are already using this route.</p> <p>b) A further option for this section, which has only recently become practical following the restoration of a boardwalk, is as follows - from near the western end of GPM–1-S013, just east of the junction with the B3385, go into the CROW Access area north of Privett Road (B3333) and follow the track broadly eastwards as far as the footpath SE from the track to the boardwalk. Follow the boardwalk across the reed bed to emerge on Privett Road, opposite the junction with Browndown Road at the eastern end of S013. The pelican crossing close to this junction can then be used to return to the current proposed route a little way east along S014. This has the advantage of being much more pleasant than the route on a well-used cycle path beside a busy ‘B’ road.</p>	
Natural England’s comments	
<p>a. Natural England was not able to propose a route through the military training area at Browndown. The area is subject to a Military Byelaw and is therefore automatically excepted from the coastal access rights under paragraph 13 of Schedule 1 to the CROW Act. In addition, because the land is subject to a military byelaw it does not meet the requirements in the Marine and Coastal Access Act 2009/s296(5) relating to “accessible land”.</p> <p>We acknowledge that the route is already well-used and when the ranges are not in use, walkers may choose to make use of the permissive access. Signage exists at both entrances to the site detailing the current arrangements, including a route along the coast and we feel these are sufficient. Photo 5.1 in Section 5 shows one of these signs.</p> <p>b. Our proposed alignment along Privett Road was determined to be the most convenient and quickest route back to the coast. The proposed modification involves an inland detour, an additional road crossing and adds to the distance travelled without being any closer or providing any view of the coast. The route along Privett Road is well maintained and wide, allowing for pedestrians and cyclists to pass freely.</p> <p>Our proposed route also places significantly less of a maintenance requirement on the Access Authority than the proposed modification which would be routed along earth tracks and a boardwalk.</p>	
Relevant appended documents (see section 5): 5.1 Photo showing signage at Browndown	

Representation number:	MCA/GPM1/R/4/GPM0019
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Organisation/ person making representation:	[redacted] The Ramblers Association
Route section(s) specific to this representation:	GPM-1-S023 to S028 Map 1e
Other reports within stretch to which this representation also relates:	N/A
Representation in full	
<p>Fort Gilkicker and Stokes Bay Golf Course</p> <p>From Fort Gilkicker at the start of GPM-1-S023 an existing path continues along the sea wall as far as Fort Monckton boundary fence. There is then a walkable route around the edge of the golf course following the boundary fence of the fort as far as the car park at GPM-1-S028. We note the entry in table 1.3.2 but we believe that with appropriate measures to keep walkers close to the fence the adoption of this route would greatly reduce the amount of road walking along this stretch, provide better sea views and not add to the total distance of the path. Again, we note that this route is already used by local walkers.</p>	
Natural England's comments	
<p>Section 8.20.5 of the Coastal Access Approved Scheme outlines what we take in to account when proposing the route of the trail at golf courses, in that it should usually be possible to design the line of the trail to ensure that both public access and golfers' needs can be accommodated.</p> <p>In this instance the golf course in question already has a public right of way aligned through the middle of it that requires golfers to regularly stop their game and take in to account members of the public crossing several holes. We have chosen to follow this existing well used route as it provides the most convenient way to continue past Fort Monckton and still provides views of the coast and Isle of Wight in the distance as you walk south along it. Installing a second route through the golf course would not in our opinion strike a fair balance between the operation of that business and the rights of people to have access over that land, creating as it would further disruption to play.</p> <p>However we did give careful consideration to whether a route around the periphery of the golf course was appropriate or possible. In doing so we consulted with the Ramblers, the golf course manager and the Ministry of Defence who own Fort Monckton (directly adjacent to the proposed route).</p> <p>The course manager had serious concerns about a secondary route across the golf course, especially as it would have to run parallel to a number of fairways for a significant distance and run very close to 3 tees. He stated that this would cause significant disruption to play. Whilst the Ramblers state that local walkers follow their proposed modification, this is not the understanding of the golf course, who do not tolerate or wish to encourage the general public straying on to the golf course.</p> <p>The proposed modification, while off road, only saves 400m of road walking and does not increase the feeling of being by the coast, or allow any sea views, due to the presence of very high security fencing and buildings at the high security MOD site.</p> <p>The route along the sea wall in front of the golf course and up to Fort Monckton will remain available to the public should they wish to explore that part of the coastal margin.</p>	
Representation number:	MCA/GPM1/R/5/GPM1793
Organisation/ person making representation:	[redacted] Hampshire Countryside Access Forum

Route section(s) specific to this representation:	GPM-1-S023 to GPM-1-S029 Map 1e
Other reports within stretch to which this representation also relates:	N/A

Representation in full

Fort Gilkicker and Stokes Bay Golf Course

From Fort Gilkicker at the eastern end of GPM-1-S022 the proposed route follows almost a mile of tarmacked roads. Because there is inevitably a significant amount of tarmac along the whole of the Gosport to Portsmouth Stretch it seems appropriate to take advantage of opportunities to avoid tarmac here. This can be done by following the existing path along the sea wall as far as Fort Monckton boundary fence and then following the walkable path around the Fort. The entry in table 1.3.2 is noted, but we believe that with appropriate measures to keep walkers close to the fence the adoption of this route would greatly reduce the amount of road walking along this stretch.

Natural England's comments

Section 8.20.5 of the Coastal Access Approved Scheme outlines what we take in to account when proposing the route of the trail at golf courses. In this instance the golf course in question already has a public right of way aligned through the middle of it that requires golfers to regularly stop their game and take in to account members of the public crossing several holes. We have chosen to follow this existing well used route as it provides the most convenient way to continue past Fort Monckton and still provides views of the coast and Isle of Wight in the distance as you walk south along it. Installing a second route through the golf course would not in our opinion strike a fair balance between the operation of that business and the rights of people to have access over that land, creating as it would further disruption to play.

However we did give careful consideration to whether a route around the periphery of the golf course was appropriate or possible. In doing so we consulted with the Ramblers, the golf course manager and the Ministry of Defence who own Fort Monckton (directly adjacent to the proposed route).

The course manager had serious concerns about a secondary route across the golf course, especially as it would have to run parallel to a number of fairways for a significant distance and run very close to 3 tees. He stated that this would cause significant disruption to play.

Whilst the Ramblers state that local walkers follow their proposed modification, this is not the understanding of the golf course, who do not tolerate or wish to encourage the general public straying on to the golf course.

The proposed modification, while off road, only saves 400m of road walking and does not increase the feeling of being by the coast, or allow any sea views, due to the presence of very high security fencing and buildings at the high security MOD site.

The route along the sea wall in front of the golf course and up to Fort Monckton will remain available to the public should they wish to explore that part of the coastal margin.

Representation number:	MCA/GPM1/R/6/GPM1793
Organisation/ person making representation:	[redacted] Hampshire Countryside Access Forum (HCAF)
Route section(s) specific to this representation:	GPM-1-S031 to GPM-1-S035 Map 1e & 1f

Other reports within stretch to which this representation also relates:	N/A
Representation in full	
<p>Haslar Sea Wall – potential for longer term improvement</p> <p>As noted in the Overview to the report, there is potential for a great improvement to the current route once the development of the former Haslar Hospital site is completed. (GPM-1-S031 to GPM-1-S035). The Forum is keen to ensure that a watching brief is kept on this section so that opportunities can be taken when appropriate.</p>	
Natural England’s comments	
<p>We agree with HCAF. Natural England and Gosport Borough Council have agreed to work together to ensure any future opportunities for improvements to the trail in this area are identified and acted upon, as outlined in the Future Changes section of the GPM 1 report.</p>	

Representation number:	MCA/GPM Stretch/R/1/GPM1792
Organisation/ person making representation:	<p>[redacted] The Solent Recreation Mitigation Partnership (Bird Aware Solent)</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 South Hampshire provide political governance for the Solent Recreation Mitigation Partnership. This response is submitted with their support and backing as such we are treating it as a “full” representation.</p>
Route section(s) specific to this representation:	This representation refers to the whole report
Other reports within stretch to which this representation also relates:	GPM 2, 3,4 and 5
Representation in full	
<p>As representatives of the Solent Recreation Mitigation Partnership (SRMP), 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 ECP. As you are aware those parts of the Solent being identified as a potential route for the ECP 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 ECP team have consulted with us and hope that the ECP 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 ECP route will need to satisfy the</p>	

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.

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.

Increased Visitor Numbers

Partners have expressed concerns that the ECP 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 ECP. Therefore there is a real concern of a conflict between these two initiatives. Any rise in visitor numbers as a result of ECP use has the potential to diminish the effectiveness of the SRMP measures. ECP 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

The "spreading room" is the part of the coastal margin that the public has access to by foot for its enjoyment. It is understood that in some areas of the ECP 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 ECP 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 NE'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 ECP accurately on Ordnance Survey maps, we would urge NE 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 Gosport and Portsmouth 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 26, '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 ECP 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 ECP 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.

Representation number:	MCA/GPMStretch/R/3/GPM0019
Organisation/ person making representation:	[redacted] The Ramblers Association
Route section(s) specific to this representation:	General comments applicable to the whole Gosport to Portsmouth stretch
Other reports within stretch to which this representation also relates:	GPM 2, 3, 4, 5

Representation in full

1. General Observations

Hampshire Ramblers are very pleased with the hard work by Natural England on the proposals for this stretch of the new Coastal Path. We are particularly gratified that NE have chosen to route the path around Portsmouth Harbour. This will have the benefit of linking a number of sites of great historic interest. These include Clarence Yard Victualling area, Explosion Museum and the former armaments depot at Priddys Hard, the remains of the D Day loading ramps at Hardway, the former tram depot at Hoeford, the area of interesting buildings around Fareham Quay, Portchester Castle, Hilsea Lines and the Naval Dockyard at Portsmouth. The route also passes through an area of dense population and close to some areas with a high degree of social deprivation. Here the provision and signage encouragement for the use of a coastal path will enhance the walking environment for recreational and general wellbeing of the nearby communities. It is also beneficial for tourism.

Ramblers particularly welcome the following –

Wicor Foreshore

It is pleasing to note that the short stretch of foreshore from Wicor Recreation Ground from GPM-3-S029 to the junction with the alternative route at S036 is being utilised. This only floods for short periods at spring tides.

Portchester Castle

This will provide one of the highlights of the path around Portsmouth Harbour.

Camber Dock

We are pleased that NE has proposed the route around Camber Docks. This route also has the strong support of local residents who have an effective campaign to maintain the historic access to this interesting dock area.

Ramblers also note that over time there will be considerable opportunity for further improvement to parts of the route where MoD disposal and/or further development are due to take place, see our further representation about these opportunities.

Natural England's comments

Natural England welcome the Ramblers support for the proposed route alignment at the above locations.

Representation number:	MCA/GPMStretch/R/4/GPM0019
Organisation/ person making representation:	[redacted] The Ramblers Association
Route section(s) specific to this representation:	GPM-1-S031 to GPM-1-S035 GPM-2-S055 to GPM-2-S082 GPM-4-S025 to GPM-4-S035
Other reports within stretch to which this representation also relates:	GPM 2 and 4
Representation in full	
<p>Whilst the proposals for the ECP route from Gosport to Portsmouth represent a welcome and very significant achievement Ramblers believe that there are a number of longer-term potential opportunities as a result of planned future developments in the area. These include -</p> <p>9. Haslar Sea Wall – potential for longer term improvement The potential for a great improvement to the current route is noted once the development of the former Haslar Hospital site is completed. (GPM-1-S031 to GPM-1-S035). This will restore through access to the sea wall which was lost in the 1980's when as a security measure the access at the eastern end of the sea wall was sealed off.</p> <p>10. Route northwards from Monks Walk along the Foreshore Past Defence Munitions and Fleetlands – potential for longer term improvement It is noted that this was considered and rejected. This foreshore is a most attractive section of the harbourside. (GPM-2-S055 to GPM-2-S077, or beyond to S082). It should be kept in mind that when any change of use or land disposal takes place, as is likely in the future, that there will be opportunities for really attractive extensions and improvements to the proposed Coast Path. This would avoid one of the worst sections of the current proposal, along the A32.</p> <p>11. Tipner – potential for longer term improvement The proposed route through this area is less than satisfactory. (From the southern end of GPM-4-S025 to S035). If the development of the bridge for pedestrians, cyclists and rapid bus goes ahead this could reduce the need for improvements. Because of the current use and changes being made to this area we feel that a watching brief should be kept on developments with opportunities for enhancement to the existing route taken whenever these arise.</p>	
Natural England's comments	

Natural England notes the Ramblers comments above. These desires for future improvements are shared by Natural England, Portsmouth City Council, Gosport Borough Council and Fareham Borough Council, all of whom have agreed to work closely to ensure that future opportunities are identified and acted upon, as outlined in the Future Changes section of the GPM 1 report.

Representation number:	MCA/GPMOverview/R/1/GPM1793
Organisation/ person making representation:	[redacted] Hampshire Countryside Access Forum
Route section(s) specific to this representation:	General observations about whole route
Other reports within stretch to which this representation also relates:	GPM 2, 3, 4, 5
Representation in full	
<u>General Observations</u>	
<p>The Hampshire Countryside Access Forum (HCAF) welcomes the decision to route the England Coast Path around Portsmouth Harbour and commends the proposed route for doing a good job of offering the best coastal route it can in a highly urban industrial stretch of coastline.</p> <p>Natural England's early engagement with the Forum when formulating initial proposals is appreciated.</p> <p>Our representations, some of which are longer-term, seek to make further improvements in some of the most difficult sections of the route.</p>	
Natural England's comments	
<p>Natural England appreciates the Forum's support for our decision to route around Portsmouth Harbour and notes their desire to ensure future opportunities for improvements to the route are acted on.</p>	

Representation number:	MCA/GPMOverview/R/2/GPM1793
Organisation/ person making representation:	[redacted] Hampshire Countryside Access Forum
Route section(s) specific to this representation:	Comments about all areas of excluded spreading room
Other reports within stretch to which this representation also relates:	GPM 2, 3, 4, 5
Representation in full	
Permanent Access Exclusion from spreading room, Magenta wash on OS maps	
<p>We support the proposed areas of excepted land under Section 25A. There are large areas on this stretch where this applies. Views over this sensitive habitat are provided by the route. It is important that that public safety is not jeopardised by inappropriate access, and that disturbance to wildlife in such areas is reduced to as little as possible.</p> <p>The Hampshire Countryside Access Forum believes that the way spreading room will be displayed on OS maps (using the national 'magenta wash' notation) could put these habitats at risk of disturbance, cause confusion for walkers and create signpost clutter in the countryside in order to enforce the exceptions.</p> <p>The Forum believes that such large areas of permanently excepted spreading room should either be depicted differently or not shown at all on OS maps.</p> <p>This is a national issue but is particularly relevant on this stretch of the coast path.</p>	

Natural England's comments

To avoid duplication we refer the Secretary of State to our detailed comments on the depiction of coastal margin on Ordnance Survey Explorer maps in representation MCA/GPM/Stretch/R/1/GPM1792 (Bird Aware SRMP).

In addition we would like to clarify for the avoidance of any doubt that the 'excepted land' to which HCAF refers is we believe in fact our proposal to exclude access by direction under S25A of CROW because the mud flats are unsuitable for public access.

In addition, it should be noted that because of the duty to periodically review the need for directions to exclude access, no direction could truly be said to be permanent. The potential impermanence of directions and excepted land is another reason why these areas could not be depicted differently on the OS mapping as HCAF suggests.

Representation number:	MCA/GPM2/R/1/GPM0019
Organisation/ person making representation:	[redacted] The Ramblers Association
Route section(s) specific to this representation:	GPM-2-S025 to GPM-2-S030
Other reports within stretch to which this representation also relates:	N/A

Representation in full**4. Explosion Museum**

Between GPM-2-S025 and S030 it is possible, and preferable, to follow the route through the entrance and parking area for the Gosport Explosion Museum of Naval Firepower. This enables users to view some of the Museum's outdoor exhibits, it is slightly shorter and more straightforward than the route used in the proposal. This proposed route is the one normally used by walkers and cyclists during museum open times and would leave the route proposed in the report as an alternative when the Museum is closed.

Natural England's comments

The entrance and parking area referred to has gates at both ends which are locked outside of the opening hours of the museum. Whilst it would have some advantages as highlighted by The Ramblers Association, we also consider that it would not provide any more of a coastal experience than the route we have proposed.

Having spoken to the Museum operators (owners) about the route, they raised concerns about the compatibility of the Coast Path and the security arrangements of the site. The owner's preference was for our proposed route.

However the existing informal arrangements will continue therefore the route outlined by the Ramblers will be available to the public during the museum opening hours.

Representation number:	MCA/GPM2/R/2/GPM0019
Organisation/ person making representation:	[redacted] The Ramblers Association
Route section(s) specific to this representation:	GPM-2-S044 to GPM-2-S054, GPM-2-OA002 to GPM-2-OA005

Other reports within stretch to which this representation also relates:	N/A
Representation in full	
5. Quay Lane	
<p>We are pleased to see the use of the foreshore right of way as far as Quay Lane boatyard GPM-2-S044. From this point it is much shorter and with better sea views to continue west, then north along Quay Lane, and take the existing well used path between the easternmost building on the industrial estate and the sea, to re-join the planned route at the end of S054. We note the entry in table 2.3.3 and recognise that it is possible that at very high spring tides this route may become unavailable for short periods, but we have never seen it so flooded as to be unusable.</p> <p>This suggestion would greatly shorten the proposed route and avoid an unnecessary diversion inland away from the coast.</p> <p>The proposed sections S047 to S054 could be joined with OA002 to OA005 to create a ‘high water’ alternative if necessary.</p> <p>Though a very short section, this proposal would provide the greatest benefit for the least cost</p>	
Natural England’s comments	
<p>We welcome the positive comments in support of a route on the foreshore as far as Quay Lane boatyard.</p> <p>We discounted continuing the route along the Public Right of Way until Monks Walk, for the following reasons (as summarised in report GPM 2, section 2.3.3 Other options considered: Maps GPM 2a, 2b and 2c: Hardway to Holbrook):</p> <ul style="list-style-type: none"> • The route along the foreshore is boggy and would not be available during high tide. • Part of the mudflats here are sensitive high tides roosts for bird species that are notified features of the local protected sites. • There is a drainage pipe that is not a suitable surface to walk over, and would require infrastructure works to cross. The access authority (Hampshire County Council), advised against major infrastructure works in this area, based on cost and feasibility due to the tidal location. • Under our proposals, the public footpath would remain available for people to use as part of the spreading room, but would not form part of the designated trail. <p>Also, the landowner of a breaker’s yard in the Industrial Estate was consulted regarding route proposals in this area. They advised not using a route along the seaward side of their property (east of GPM-2-S054), as activities in the yard there could pose a health and safety risk to walkers. The chosen route would divert around the areas where these activities take place. There were also concerns that this was not a visually pleasant walk, due to its industrial nature.</p> <p>It was felt that the chosen route was the most feasible option and provided a good walking surface suitable for all users.</p>	

Representation number:	MCA/GPM2/R/3/GPM0019
Organisation/ person making representation:	[redacted] The Ramblers Association
Route section(s) specific to this representation:	GPM-2-S058 to S061
Other reports within stretch to which this representation also relates:	N/A

Representation in full
6. Near Monks Walk
Beyond Monks walk at the western end of GPM-2-S058 the long stretch along the combined footway and cycleway beside Heritage Way can be reduced by taking the mown and well used existing path through the woodland to emerge at the junction of Gunners Way with Heritage Way. This is a much quieter, traffic free, and a more natural environment with a more pleasant walking surface. Heritage Way can then be crossed at the western end of S061 to join the existing proposed route.
Natural England's comments
The route amendment proposed by the Ramblers near GPM-2-S058 would only offer an addition of around 225 metres of off-road walking, adjacent to our proposed route which uses the pavement. A route change here will not provide any benefits in terms of sea views or a more coastal feel, as the route is diverting inland at this point, to divert around the MoD site and link up with the A32.
The proposed amendment would also place a higher maintenance requirement on the access authority and is no more direct or convenient than the proposed route.

Representation number:	MCA/GPM2/R/4/GPM0019
Organisation/ person making representation:	[redacted] The Ramblers Association
Route section(s) specific to this representation:	Part of section GPM-2-S072
Other reports within stretch to which this representation also relates:	N/A

Representation in full
7. A 32
The long walk along the footway of the busy A32, GPM-2-S068 to S082, is very unattractive but unavoidable at present. However, it should be noted that for several hundred metres there is a more attractive existing walked route set back from the road on its eastern side. This starts to the north of the junction with Camp Road as far as Foxbury Lane (all part of GPM-2-S072). This route is behind bushes following the boundary fence of the RNAD land.
Natural England's comments
The proposed route amendment here would not provide any additional sea views or a more coastal feel, with the MoD and other large industrial buildings blocking any distant views of the harbour. It is no more convenient or easy to use than our proposed route on the pavement and would place a higher maintenance requirement on the access authority to maintain.
We consulted with the landowner (the MoD) regarding the possibility of using this walking route. The MoD expressed concerns about making this route a formal one, given the high-security nature of the DSDA Gosport and Fleetlands sites, as this route runs right up against their fence line (the hedgerows described are for visual screening). The decision was thus made to follow the pavement along the A32. The space between the hedge and the fencing, described by the Ramblers as a "path" is maintained for security purposes by the MOD and is not suitable for use as a path.
As such we feel the route is currently in the most suitable location.

Representation number:	MCA/GPM4/R/1/GPM0019
Organisation/ person making representation:	[redacted] The Ramblers Association
Route section(s) specific to this representation:	GPM-4-S001 to GPM-4-S024

<p>Other reports within stretch to which this representation also relates:</p>	<p>GPM 3</p>
<p>Representation in full</p>	
<p>8. Port Solent and environs</p> <p>Route sections GPM-4-S001 alongside the very busy A27 to GPM-4-S022 are very unpleasant because of constant traffic and include several complicated dual carriageway crossings at controlled lights. (NB there is one busy crossing at the eastern end of S005 where there are no pedestrian lights to aid crossing, this is dangerous).</p> <p>The consideration given in the report to the development of the nearby Country Park is noted. This development is progressing apace and is due to open in 2020. Once the Country Park is open – this is imminent – Ramblers feel that an alternative to this whole section should be considered, utilising the existing track and bridge beside the M275. At present there is a locked gate at Hilsea Roundabout, on the north side of Tipner Lake, adjacent to GPM-4-S024, which provides access to a track running parallel to the M 275, at the foot of the embankment. This leads to a bridge under the M 275 which could provide access to the new Country Park. The track would require fencing between it and the motorway but in other respects would fulfil the brief for the coastal path – providing sea views, greatly reducing the distance on pavement or cycleway beside busy main roads. It would link with existing paths starting southwards from GPM-3-S090 running down the west side of the Port Solent development, crossing the sea lock on the existing bridge, and then running through the Country Park. Development of this route would greatly enhance access to the Country Park for the residents of Portsmouth, one of the most densely populated cities in Europe.</p> <p>8a. Lakeside Development</p> <p>The preferred route is above. However, has consideration been given or consultation undertaken, for the use of the cycleway and footpath around the IBM site at Lakeside? This starts at the subway GPM-4-S036 CP and continues on a pleasant route parallel with the link to the Motorway, then loops round the lake to head SE and eventually re-join the roadside path at GPM-4-S022 RD</p>	
<p>Natural England's comments</p>	
<p>8. Port Solent and environs</p> <p>The Rambler's desires for future improvements are shared by Natural England and Portsmouth City Council, who have agreed to work closely to ensure any future opportunities are identified and acted upon, as outlined in the Future Changes section of the GPM 4 report.</p> <p>We note the comments about the roadside environment of the route along the A27, but believe the chosen route to be the best available under present circumstances. Regarding the road crossing at the eastern end of GPM-4-S005 which The Ramblers suggest is potentially dangerous; this is the turning off the main road to access the Marriott Hotel. The traffic will be speed-restricted at the crossing point, as the hotel car park specifies a 5mph speed limit. There are dropped kerbs on either side of the road and pedestrian barriers, indicating that this is a pedestrian crossing point. This is also a very busy urban environment where road users are expecting pedestrians to be using the crossing points. No concerns were raised at this location by the highways department in their road safety assessment reports.</p> <p>Regarding The Ramblers's suggested modification to the route that would make use of the existing M275 bridge – our thoughts about this are summarised in GPM 4: section 4.3.2 (Other options considered: Map(s) GPM 4a to GPM 4c: Port Solent to Portsea Island. It is currently not possible to access Tipner from Horsea Island (see future changes) – there is currently no bridge to Portsea Island that is suitable for pedestrians. The Highways Authority was consulted as landowner of the access track running along the embankment parallel to the M275. They advised against opening this as a public walking route on the grounds of serious health and safety concerns; this is a secure area not designed for public access. There is currently nothing in place to stop people from accessing the motorway and vehicles moving at high speed. An access route here would require significant security fencing and barriers to provide separation from the high-speed traffic using the motorway above.</p>	

We feel the proposed route is cost-effective, convenient and easy to follow (in places following an existing long distance walking trail, the Pilgrim's Way). It was also proposed because of the long term ambition to create a pedestrian link from Tipner to Horsea Island as outlined in the future changes section at 4.2.18 of GPM 4.

8a Lakeside Development:

With regards to the query raised about a possible route adjustment at the Lakeside Development – the landowner at the Lakeside site, IBM, was consulted early on in the development stage of the route.

This area was discounted as we could not reach an agreement with them – they wanted to maintain current security arrangements, with the gates locked at certain times, and we did not believe this compatible with the Coast Path route at this location. Whilst the lakeside route was off road it was no more direct or convenient to use as a way of returning to the coast. With the ambition to open the country park route in the near future (as above) we felt our proposed alignment in these locations achieved the fairest balance.

Representation number:	MCA/GPM4/R/2/GPM1793
Organisation/ person making representation:	[redacted] Hampshire Countryside Access Forum
Route section(s) specific to this representation:	GPM-4-S001 to GPM-4-S022
Other reports within stretch to which this representation also relates:	GPM 3
Representation in full	
Port Solent and Horsea Island Country Park	
Route sections alongside the very busy A27 from GPM-4-S001 to GPM-4-S022 are very unpleasant because of constant traffic and include several crossings of busy junctions at controlled lights.	
Again, the Forum recognises that the potential for further improvements when development takes place is identified in the report. However, we feel that given the relatively advanced plans for the Horsea Island Country Park some definitive planning of a new route through the park and around Port Solent should be considered now. The park is due to open in 2020. We understand that the Ramblers have identified some potential for an improved route.	
Natural England's comments	
Natural England acknowledges the Forum's comments relating to the future changes along this part of the stretch. These desires for future improvements are shared by Natural England and Portsmouth City Council, who have agreed to work closely to ensure any future opportunities are identified and acted upon, as outlined in the Future Changes section of the GPM 4 report.	
Please refer to our comments made in response to representation MCA/GPM4/R/1/GPM0019, and our analysis in GPM 4: section 4.3.2 (Other options considered: Map(s) GPM 4a to GPM 4c: Port Solent to Portsea Island). There is currently no suitable bridge to Portsea Island from Horsea Island for pedestrians. The Ramblers' proposed modified route along the currently-locked access track adjacent to the motorway was considered but necessarily discounted, after consultation with the landowner of the track.	
Portsmouth City Council could not provide a definite start date for any of the works in regards the opening of the country park or the bridge and so we did not feel it appropriate to suggest a route at this time.	

Representation number:	MCA/GPM4/R/3/GPM1793
Organisation/ person making representation:	[redacted] Hampshire Countryside Access Forum

Route section(s) specific to this representation:	GPM-4-S026 to GPM-4-S034
Other reports within stretch to which this representation also relates:	N/A
Representation in full	
<p>Tipner</p> <p>The proposed route through this area is not very satisfactory. Again, the Forum believes that a very close watching brief should be taken on proposed developments in this area, including the suggested bridge between Tipner and Horsea Island that is mentioned in the reports.</p>	
Natural England's comments	
<p>These desires for future improvements, are shared by Natural England and Portsmouth City Council, who have agreed to work closely to ensure any future opportunities are identified, as outlined in the Future Changes section of the GPM 4 report. Natural England will then consider whether it is appropriate to submit a variation report proposing a change to the approved route.</p>	

Representation number:	MCA/GPM5/R/1/GPM1793
Organisation/ person making representation:	[redacted] Hampshire Countryside Access Forum
Route section(s) specific to this representation:	GPM-5-S044 to GPM-5-S052
Other reports within stretch to which this representation also relates:	N/A
Representation in full	
<p>Camber Dock</p> <p>We are pleased that NE has proposed the route around Camber Docks. This route also has the strong support of local residents who have an effective campaign to maintain the historic access to this interesting dock area. However, HCAF is concerned that this is always a busy working area and therefore questions how often this section of the route will actually be open to the public. We query whether the site owners have given any realistic indication to NE as to how often they will need to close the route for operational or event reasons? A good alternative route is proposed, and we are concerned that this maybe quickly become the default.</p>	
Natural England's comments	
<p>Natural England welcomes the Forum's positive comments in support of the route around the Camber Dockyard.</p> <p>Section 6.7.13 of our Coastal Access Approved Scheme handbook describes outline directions as follows:</p> <p>"Where the exact periods when a restriction or exclusion will be needed are not yet known but it has clearly been established that one may be necessary in specified circumstances, we may give an 'outline' direction, which allows any actual periods of restriction or exclusion to be determined later by a specified person. Outline directions may be used in relation to land management, public safety, fire prevention, nature conservation or heritage preservation concerns."</p> <p>We may place conditions on the use of an outline direction for any of the purposes above to ensure that it is only used to the extent necessary.</p> <p>Due to the unpredictable nature of the activities on the site, we are not able to clearly specify time periods during which access is not to be restricted or excluded. Instead, our direction is prescriptive to</p>	

include geographical boundaries (the area where the dock activities take place) but not a specific date or time that it will take place. We will manage this through the provision of signage, making it clear that the access will be restricted **whenever it is necessary** for the Port to be able to carry out its work. We will work with the landowner of the Dockyard and the Access Authority (Portsmouth City Council) to devise appropriate text for the signs.

We note that there are regularly small-scale diversions for walkers around specific activities already at this site. From our discussions with the site managers we expect for this arrangement to continue and that for full scale closures of the Camber to be minimal.

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

Representation ID:	MCA/GPM1/R/1/GPM1743
Organisation/ person making representation:	[redacted] Defence Infrastructure Organisation (DIO)
Name of site:	Land north-east of Fort Monckton, Gosport
Report map reference:	Map GPM 1e: Gosport Lifeboat Station to Clayhall
Route sections on or adjacent to the land:	GPM -1-S029
Other reports within stretch to which this representation also relates	N/A
Summary of representation:	
<p>DIO intending to negotiate the leasehold acquisition of the Fort Road car park (the area shown on the map supplied with the representation). The intention is to create a secure car park to support Fort Monckton, which is running short on space. DIO request that route of the footpath here runs along the northern edge of this proposed car park - access to the seafront in both directions would remain unaffected.</p>	
Natural England’s comment:	
<p>Having considered this request, Natural England supports the proposed modification. We chose the original route as it followed a desire line on the ground, skirting the southern part of the car park therefore reducing coastal margin. We have liaised with the Defence Infrastructure Organisation (DIO) to agree the new route position.</p> <p>Natural England asks the Secretary of State to approve the modification set out in the aerial image submitted by the DIO on the 23rd August 2019. We have followed this map in our amendments, and have updated our GI layers and length map accordingly. One infrastructure point has been moved and another removed as a result of these minor changes to section GPM-1-S029.</p>	
Relevant appended documents (see section 5):	
5.2 DIO map submitted with representation ‘Fort Road car park’	
5.3 Aerial image submitted by DIO of suggested re-routing of path	
5.4 Recently-modified length map: ‘Map GPM 1e: Gosport Lifeboat Station to Clayhall’, showing revised route at this location	

Representation ID:	MCA/GPM1/R/2/GPM1576
Organisation/ person making representation:	Private Individual
Name of site:	Land north-east of Fort Monckton, plus Haslar Immigration Centre, Gosport
Report map reference:	Map GPM 1e: Gosport Lifeboat Station to Clayhall
Route sections on or adjacent to the land:	GPM-1-S029
Other reports within stretch to which this representation also relates	N/A
Summary of representation:	
Would like to see parts of Fort Road car park and Haslar Immigration Removal Centre (past which the ECP will run) turned into wildflower meadows.	
Natural England's comment:	
The outcomes that [redacted] asks for are outside the scope of our proposals.	
Relevant appended documents (see section 5): 5.5 Map submitted with representation	

Representation ID:	MCA/GPMStretch/R/2/GPM0159
Organisation/ person making representation:	[redacted] Gosport Borough Council
Name of site:	Comments about stretch as a whole, but also refers to: Haslar Road, Gosport, PO12 2AS Haslar Immigration Removal Centre, Dolphin Way, Gosport, PO12 2AW Royal Clarence Yard Retained Area, Weevil Lane, Gosport, PO12 1FR Hardway, Priory Road, PO12 4LG Heritage Way, Gosport Fareham Road/A32, Gosport
Report map reference:	All maps - GPM Map 1a to GPM Map 1f
Route sections on or adjacent to the land:	GPM-1-S031 to GPM-1-S035, GPM-1-S027 to GPM-1-S033, GPM-2-S010 FW to GPM-2-S014, GPM-2-S037, GPM-2-S054 and GPM-2-S063, GPM-2-S066 to GPM-2-S082
Other reports within stretch to which this representation also relates	GPM 2
Summary of representation:	
Supportive comments of our proposal to align a continuous trail around Portsmouth Harbour, subject to their being no adverse impacts upon areas of nature conservation or operational MOD land.	
Gosport BC welcome that the report takes notice of 'future change' and suggestions are made by Gosport BC for potential future route changes at several locations.	

The Council welcomes proposed interpretation panels in the borough and would like additional ones at Lee-on-the-Solent and Stokes Bay. They express an interest in working with NE on ECP interpretation panel content, to highlight Gosport's heritage sites.

The representation contains a query about 'Planting of scrub to reinforce physical and visual separation between the path and foreshore' and whether this is planned within their borough.

Natural England's comment:

Natural England welcomes the Council's support for our decision to route around Portsmouth Harbour and notes their desire to ensure future opportunities for improvements to the route are acted on.

We would be happy to work closely with the Borough Council about the content and design of our interpretation panels, however we do not believe any additional panels are needed at Lee-On-the-Solent or Stokes Bay. The panels we have proposed across the stretch as a whole, were deemed necessary by our Habitats Regulations Assessment as mitigation for the possible increase in disturbance by increased visitors. The two locations above were not deemed sensitive to these pressures.

Representation ID:	MCA/GPM5/R/2/GPM1794
Organisation/ person making representation:	[redacted] Council of Solent Protection Society
Name of site:	Old Portsmouth - Camber Docks
Report map reference:	Maps GPM 5a to GPM 5c
Route sections on or adjacent to the land:	GPM-5-S042 to GPM-5-S057
Other reports within stretch to which this representation also relates	N/A

Summary of representation:

The Society notes the proposed route around Camber Docks, as it believes that there is a long-established assumed public right of access to walk the perimeter here.

However it has concerns about wording in the proposals and how the current tenant on the site may use the closures for an extended period rather than the short term as detailed in section 5.2.17 of GPM 5. The Society queries how often this route will be closed for use by the landowner for long periods.

Natural England's comment:

Natural England welcomes the comments from the Society in support of the route around the Camber Dockyard.

For ease of reference and to avoid repetition, please refer to our comments in response to representation MCA/GPM5/R/1/GPM1793 above which deals with the same points.

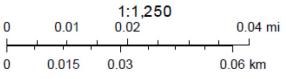
5. Supporting documents



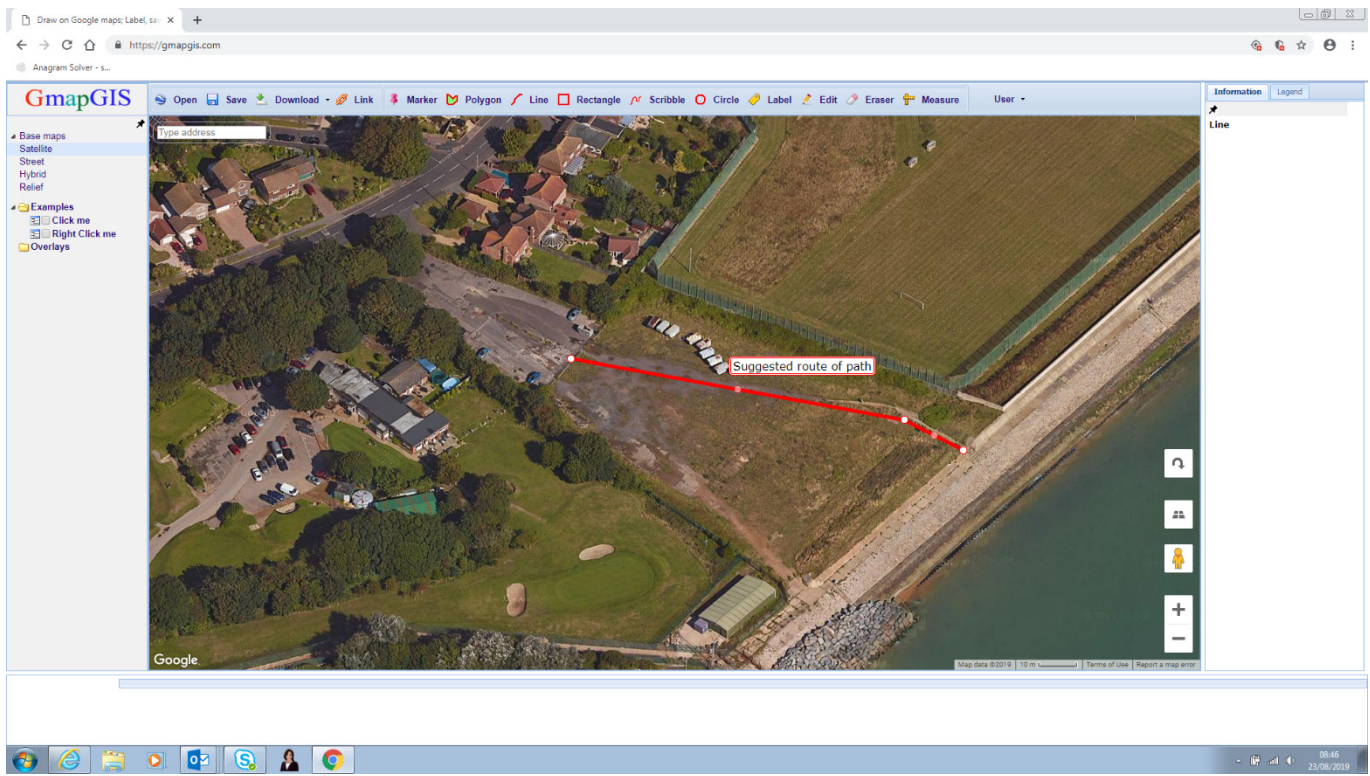
5.1 Photo showing signage at Browdown (MCA/GPM1/R/3/GPM0019)



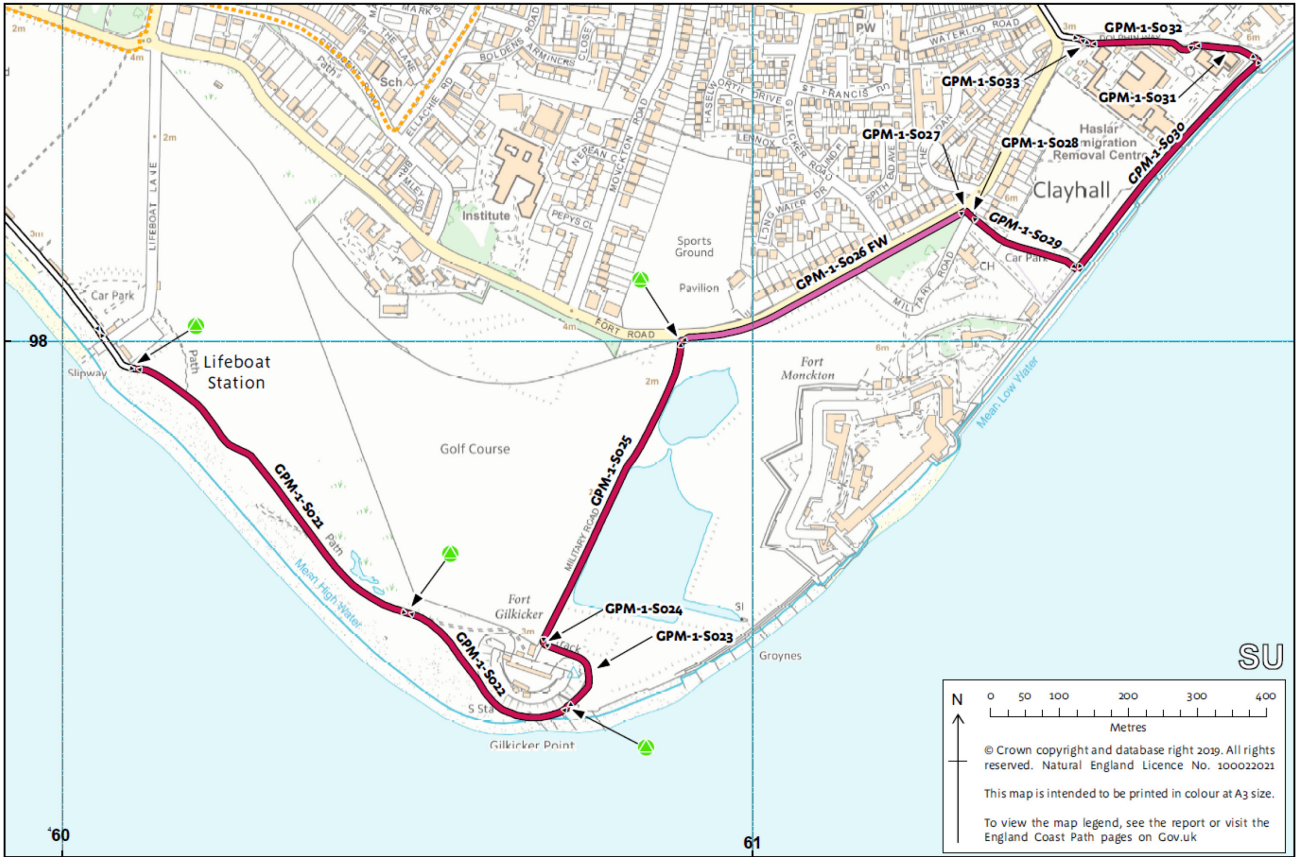
August 21, 2017



5.2 DIO map submitted with representation 'Fort Road car park' (MCA/GPM1/R/1/GPM1743)

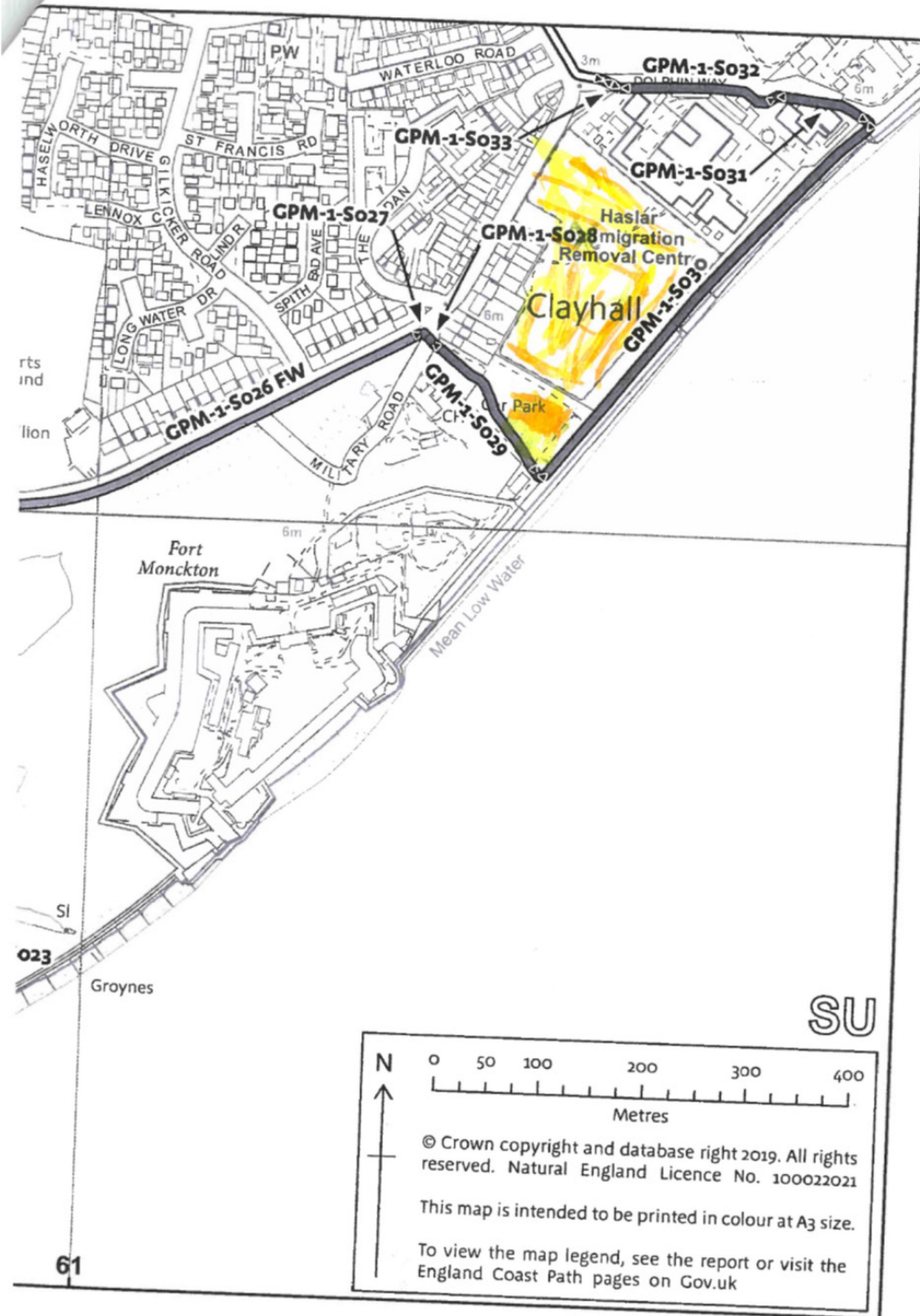


5.3 Aerial image submitted by DIO of suggested re-routing of path (MCA/GPM1/R/1/GPM1743)



Map GPM 1e: Gosport Lifeboat Station to Clayhall

5.4 Recently-modified length map: 'Map GPM 1e: Gosport Lifeboat Station to Clayhall', showing revised route at this location (MCA/GPM1/R/1/GPM1743)



Map GPM 1e: Gosport Lifeboat Station to Clayhall

5.5 Map submitted with representation (MCA/GPM1/R/2/GPM1576). Note that additional supplementary material (letters) submitted with this representation has been redacted from this record due to containing personal information.