

Coastal Access – St Mawes to Cremyll lengths 1 and 3-8



Representations with Natural England's comments

March 2020

1. Introduction

This document records the representations Natural England has received on lengths SMC1 and SMC3 to SMC8 of this report from persons or bodies. It also sets out any Natural England comments on these representations.

2. Background

Natural England's compendium of reports setting out its proposals for improved access to the coast from St Mawes to Cremyll, comprising an overview and eight separate length reports, was submitted to the Secretary of State on 20 June 2019. This began an eight-week period during which representations and objections about each constituent report could be made.

In total, Natural England received 29 representations pertaining to lengths SMC1 and SMC3 to SMC8 of the St Mawes to Cremyll stretch, of which 16 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 13 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

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| Representation number: | MCA/SMC1/R/1/SMC2580 |
| Organisation/ person making representation: | [Redacted], Cornwall Countryside Access Forum (CCAF) |
| Route section(s) specific to this representation: | SMC-1-S002 and SWC-1-S003 |
| Other reports within stretch to which this representation also relates: | N/A |
| Representation in full | |

The current ferry service operates summer only. It therefore seems to be the case that the Scheme's requirements for a continuous route around the coast, generally available at all states of the tide (Scheme section 4.4) are not met if the route is not available for c.6 months of the year. However, the Report states that the ferry service is "set to become a full time service. This is a key reason for our decision; should the full time service cease to be viable at any point, we would review the alignment here." If indeed a full time service is provided, the alignment is supported. If the ferry ceases to be full time, then Natural England must be required to adhere to their commitment to review the situation in order that the Scheme's continuity requirement be met.

Natural England's comments

See paragraph 1.2.17 of report *SMC 1: St Mawes to Nare Head* which states that "The route of the trail in this report incorporates the use of a ferry from St Mawes to Place. Should the ferry service become unsuitable for the purpose, Natural England will review the trail alignment and, if appropriate, will prepare a separate variation report to the Secretary of State to ensure an uninterrupted journey for this part of the coast".

Relevant appended documents (see section 5): N/A

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| Representation number: | MCA/SMC1/R/2/SMC2580 |
| Organisation/ person making representation: | [Redacted], Cornwall Countryside Access Forum (CCAF) |
| Route section(s) specific to this representation: | SMC-1-S012 |
| Other reports within stretch to which this representation also relates: | N/A |
| Representation in full | |
| <p>The route crosses the neck of the headland of Amsterdam Point. A more seaward route would be preferable here. Natural England's claim is that the current sea views are good, whereas a route around the headland would be in woodland and that the current route is more direct. However, it would be possible to provide a more seaward route not entirely in woodland which would provide more views up the Percuil River, not currently available, while maintaining the current views. Further, while the route should, according to the Approved Scheme, be "reasonably direct", this does not mean the most direct route should be chosen if the result is that the best route for enjoyment of the coastal environment is not followed.</p> | |
| Natural England's comments | |

4.7.1 of the Approved Coastal Access Scheme, states that “where there is an existing national trail along the coast - or another clear walked line along the coast, whatever its status - we normally propose to adopt it as the line for the England Coast Path”

However in making our proposals we considered carefully opportunities to improve the line of the existing South West Coast Path and have made proposals to that effect in 12 places along this stretch. In doing so we had to assess whether the alignment would deliver significant improvements in terms of the other statutory criteria and principles set out in this Scheme, as well as whether the new alignment makes sense in terms of cost to the public purse.

Our reasoning for the proposed alignment is set out in Table 1.3.3 of report *SMC 1: St Mawes to Nare Head*: the alignment of the route was proposed after contact with the landowner and Access Authority. There was concern from the Access Authority about the potential cost of ongoing maintenance of establishing a route around Amsterdam Point. The existing walked route of the South West Coast Path was preferred, which has good views of the sea, is more direct and has a strong coastal feel.

Relevant appended documents (see section 5):

N/A

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| Representation number: | MCA/SMC1/R/3/SMC2580 |
| Organisation/ person making representation: | [Redacted], Cornwall Countryside Access Forum (CCAF) |
| Route section(s) specific to this representation: | SMC-1-S102 and SMC-1-S103 |
| Other reports within stretch to which this representation also relates: | N/A |
| Representation in full | |
| It is accepted that the original line of the SWCP seaward of the hotel is not viable long-term. In these circumstances the proposed route, with its slight change in alignment from the current permissive walked line, is the most suitable available. | |
| Natural England’s comments | |
| We welcome the positive engagement from CCAF during the development of our proposals and their supportive comments. | |

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| Representation number: | MCA/SMC1/R/7/SMC2588 |
| Organisation/ person making representation: | [Redacted], Ramblers’ Association, Cornwall |

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| Route section(s) specific to this representation: | Between SMC-1-S002 and SWC-1-S003, SMC-1-S013 |
| Other reports within stretch to which this representation also relates: | N/A |
| Representation in full | |
| St Mawes to Place Ferry | |
| <p>The report states that the ferry timetable will be extended to run all year round. It makes no mention of how this is to be funded or assessment of the financial viability of running during the winter. The intended frequency of the ferry in the winter period is not stated. It is our view that the ferry will need substantial funding for winter working and will need a minimum frequency of about hourly to avoid walkers having to wait in a remote area for a considerable time. Although the report states that should all year-round working cease, the situation will be reviewed, our concern is that while there is presently funding for a path around the Percuil River, in the future this is unlikely and the situation will not meet the requirements of the Coastal Access Scheme.</p> <p>The ferry presently does not operate if wind strength is forecast to be above force 4. Wind strengths in the winter are generally considerably greater than in the summer, leading to much greater disruption to the service.</p> <p>The report accepts that there would be some recreational benefit of a path around the river. A few years ago, the National Trust dedicated paths on the east side of the River and these have proved very popular with locals and those from further afield. All the land on both sides of the River is designated as an Area of Outstanding Natural Beauty, so is likely to be very much enjoyed by walkers. A path along both sides of the river and back to the starting point by ferry would make a beautiful walk. We therefore recommend that the proposal be modified by the addition of a path around the Percuil River.</p> | |
| Route Section SMC-1-S013FP | |
| <p>At OS grid reference SW849323, the South West Coast Path does not slavishly follow the line of the public path shown on the definitive map but cuts off the corner. This is a much more desirable line used by most walkers as it has a less steep gradient, is more direct and probably has better views. We strongly recommend that the present route of the SWCP is retained as the route of the England Coast Path.</p> | |
| Natural England's comments | |
| <p>The ferry between St Mawes and Place is a commercial venture that will provide an all year round ferry service in addition to the existing river taxi. The ferry operator is intending to use the larger ferry, with covered cabin which is more resilient to bad weather, from the Falmouth to St Mawes service in the winter months on a call off basis, tide permitting.</p> <p>We note that Ramblers' Association, Cornwall would like to see a route around the Percuil River and we agree with him that there would be some recreational benefits in doing so, however we have chosen not to make such a proposal in this report. See table 1.3.3 for our analysis of this decision.</p> | |

Our proposed alignment for section SMC-1-S013 follows a public right of way at the edge of the field, closer to the sea than the South West Coast Path, at the request of the landowner. We have made a cartographic error on this section, the colour of the route line on our report map for SMC-1-S013 should, in part, be “trail not using existing walked route” rather than “trail using existing South West Coast Path”. The alignment of the route is correct, Natural England have corrected their online data. We ask the Secretary of State to take note.

Relevant appended documents (see section 5):

5a MCA/SMC1/R/7/SMC2588, **5b** MCA/SMC1/R/7/SMC2588 and **5c** MCA/SMC1/R/7/SMC2588.

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| Representation number: | MCA/SMC3/R/1/SMC2580 |
| Organisation/ person making representation: | [Redacted], Cornwall Countryside Access Forum (CCAF) |
| Route section(s) specific to this representation: | SMC-3-S072 to SMC 3-S075 |
| Other reports within stretch to which this representation also relates: | N/A |

Representation in full

The route uses a footpath parallel and adjacent to the B3273 road between the southern end of Pentewan Sands and the entrance to Pentewan Sands Holiday Park, and a pavement alongside the road between the Holiday Park entrance and Pentewan village road. Neither of these lengths gives sea views of any note and neither is really suitable for a National Trail, especially the pavement length. No route seaward of this alignment has been proposed because (a) the presence of steep cliffs to the south, (b) the presence of the St Austell River to the north and (c) the current route is more direct. It is suggested that a more seaward route, more suitable for a National Trail, is feasible, in that (a) while the presence of steep cliffs is acknowledged, a link between the current route and the southern end of the Sands seems possible; (b) a private bridge exists across the St Austell River; (c) a more seaward route need not be appreciably less direct; in any event, while the Approved Scheme indicates that the route should be “reasonably direct”, this does not mean that the most direct route should be chosen if the result is that the best route for the enjoyment of the coastal environment is not followed. In summary, while it may not be possible to avoid the full length of SMC-3-S072 to SMC-3-S075, at least part of this length should be positioned in a more appropriate alignment.

Natural England’s comments

See *Table 3.3.3 Other options considered* of report SMC 3: Dodman Point to Drennick for our reasons for the proposed route. The steep cliffs at the southern end of

Pentewan Beach and the St Austell River to the north of the beach mean that a beach route would not be practical.

There is a private bridge owned by Pentewan Sands, over the St Austell River. The bridge is currently locked daily at 4:30pm and at weekends for security reasons. There are business units north of the bridge which would mean negotiating access with the owners. A route through the holiday park would need to start at the entrance to the holiday park, due to the unstable nature of the cliffs to the south, which is midway along the beach. The holiday park itself is landscaped in places, so sea views in these areas would be limited. Overall concluded that overall the proposed route struck the best balance in terms of the criteria described in chapter 4 of the Coastal Access Scheme.

Relevant appended documents (see section 5): N/A

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| Representation number: | MCA/SMC3/R/3/SMC2588 |
| Organisation/ person making representation: | [Redacted], Ramblers Association Cornwall |
| Route section(s) specific to this representation: | <i>SMC-3-S069 to SMC-3-S080</i> |
| Other reports within stretch to which this representation also relates: | N/A |
| Representation in full | |
| <p>From SMC-3-S069FP to SMC-3-S073 the proposed route is visually separated from the main road but suffers from noise from fairly fast and heavy traffic. Views of the sea are probably limited.</p> <p>SMC-3-S074 and SMC-3-S075 are along a footway adjacent to a busy road with fast moving traffic. The footway is screened from the sea by a fence, a treed hedge and caravan site giving very little feel of being near the coast.</p> <p>SMC-3-S076 is along a road with no footways, is narrow in places and gives almost no views of the sea. The proposed route therefore is far from the ideal set out in the Coastal Access Scheme.</p> <p>The report gives the following reasons for adopting this route rather than a more seaward one:</p> <ul style="list-style-type: none"> • The Holiday Park has steep cliffs to the south and the St Austell River to the north meaning an access strip would not be practical. • The proposed route is more direct to Pentewan Village <p>There are steep cliffs to the south of the Holiday Park but they can be avoided. The proposed route does not appear to be the most direct route to Pentewan village except by car and is not the most direct route along the coast. There is no requirement in the Coastal Access Scheme to divert the path away from the coast in order to route</p> | |

it through villages further inland. There is a suitable bridge across the St Austell River at the top of the beach.

We attach an aerial photograph on which a possible route has been shown in blue. It is not possible to check its suitability or feasibility on the ground as we have no right of access to do so. However a careful examination of maps and photographs suggests that it is feasible, possibly with a few variations of the route.

Natural England's comments

See *Table 3.3.3 Other options considered* of report SMC 3: Dodman Point to Drennick for our reasons for the proposed route. The steep cliffs at the southern end of Pentewan Beach and the St Austell River to the north of the beach mean that a beach route would not be practical.

There is a private bridge owned by Pentewan Sands, over the St Austell River. The bridge is currently locked daily at 4:30pm and at weekends for security reasons. There are business units north of the bridge which would mean negotiating access with the owners. A route through the holiday park would need to start at the entrance to the holiday park, due to the unstable nature of the cliffs to the south, which is midway along the beach. The holiday park itself is landscaped in places, so sea views in these areas would be limited. Overall concluded that overall the proposed route struck the best balance in terms of the criteria described in chapter 4 of the Coastal Access Scheme.

Relevant appended documents (see section 5):

- *5d MCA/SMC3/R/3/SMC2588 Pentewan aerial photograph showing possible improved route in blue*
- *5e MCA/SMC3/R/3/SMC2588 View of the south end of Sconhoe Beach showing the cliff height reducing to almost nothing at the rear of the caravan site*

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| Representation number: | MCA/SMC4/R/1/SMC2580 |
| Organisation/ person making representation: | [Redacted], Cornwall Countryside Access Forum |
| Route section(s) specific to this representation: | SMC-4-S031 to SMC-4-S033 |
| Other reports within stretch to which this representation also relates: | N/A |

Representation in full

The proposed route cuts across the neck of the headland. The seaward route around the headland has not been chosen because (a) the proposed route is more direct; (b) it is supported by the landowner and (c) the headland would be available as coastal margin. However, (a) while the route is meant to be “reasonably direct”, this does not mean that the most direct route should be chosen if the result is that the best route for the enjoyment of the coastal environment is not followed; (b) a landowner has the opportunity to object to a proposed line, setting out a reasoned argument why it should not be chosen, at this stage, rather than the best line in terms of the Approved Scheme not being chosen at the outset; (c) there is no requirement for the public to be physically

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| able to access all land in the coastal margin. Given these factors, and the fact that the alignment around the edge of the headland provides sea views that the proposed line does not, then the seaward alignment should be followed. |
| Natural England's comments |
| 4.7.1 of the Approved Coastal Access Scheme, states that "where there is an existing national trail along the coast - or another clear walked line along the coast, whatever its status - we normally propose to adopt it as the line for the England Coast Path" In making our proposals we considered carefully opportunities to improve the line of the existing South West Coast Path, which is also a public right of way in this area and have made proposals to that effect in 12 places along this stretch. In doing so we had to assess whether the alignment would deliver significant improvements in terms of the other statutory criteria and principles set out in this Scheme, as well as whether the new alignment makes sense in terms of cost to the public purse. The headland is used by the public as spreading room and that will continue. In discussion with the Access Authority it was decided to propose that the alignment of the route remains on the most seaward public right of way due to significant erosion events on the headland. |
| Relevant appended documents (see section 5): N/A |

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| Representation number: | MCA/SMC4/R/2/SMC2580 |
| Organisation/ person making representation: | [Redacted], Cornwall Countryside Access Forum |
| Route section(s) specific to this representation: | SMC-4-S052 to SMC-4-S054 |
| Other reports within stretch to which this representation also relates: | N/A |
| Representation in full | |
| The proposed route cuts across the neck of this headland. The seaward route has not been chosen because (a) the proposed route is more direct and (b) the seaward route would be available as coastal margin. However, (a) while the route should be "reasonably direct", that does not mean that the most direct route should be chosen if the result is that the best route for the enjoyment of the coastal environment is not followed; (b) there is no requirement for the public to be physically able to access all land in the coastal margin. Given these factors and the fact that the seaward route around the edge of the headland provides sea views that the proposed line does not, then the seaward alignment should be followed. | |
| Natural England's comments | |
| 4.7.1 of the Approved Coastal Access Scheme, states that "where there is an existing national trail along the coast - or another clear walked line along the coast, whatever its status - we normally propose to adopt it as the line for the England Coast Path" | |

In making our proposals we considered carefully opportunities to improve the line of the existing South West Coast Path, which is also a public right of way, and have made proposals to that effect in 12 places along this stretch. In doing so we had to assess whether the alignment would deliver significant improvements in terms of the other statutory criteria and principles set out in this Scheme, as well as whether the new alignment makes sense in terms of cost to the public purse.

Relevant appended documents (see section 5): N/A

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| Representation number: | MCA/SMC6/R/1/SMC2580 |
| Organisation/ person making representation: | [Redacted], Cornwall Countryside Access Forum |
| Route section(s) specific to this representation: | SMC-6-S013 |
| Other reports within stretch to which this representation also relates: | N/A |
| Representation in full | |
| <p>On this length the current and proposed route follows a public road. While a minor road, in summer this can become very busy and as it is narrow and usually has parked cars, a traffic hazard to walkers exists, unsuitable for a National Trail. It is thus desirable that the route be moved off the road for safety reasons, and open land exists seaward of the road. The route has not been moved because (a) the current route is more direct and (b) the adjacent field is frequently used as an event venue. However, it is not true to say that a realigned route would be less direct; a route through the adjacent field would be exactly the same length; in any event, while the route should be “reasonably direct”, this does not mean that the most direct route should be chosen (to repeat, not the case here) if the result is that the best route for the enjoyment of the coastal environment, including in this case the safest route, with no traffic hazard, is not followed; (b) a route on the edge of the adjacent field, either on the seaward side or next to the road, would not preclude use for events if and when they occur.</p> | |
| Natural England’s comments | |
| <p>See <i>Table 6.3.3 Other options considered</i> of report SMC 6: Polperro to Seaton which sets out our reasons for proposing the alignment of the route. The owner of the field seaward of the proposed trail did not want the route to pass through it as they use the site as a wedding and events venue. The road is quiet and is wide enough to be safe for walkers as vehicles drive slowly and are aware of the presence of walkers. No parking is permitted on the road, at any time, between 1st June and 30th September.</p> | |
| Relevant appended documents (see section 5): N/A | |

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| Representation number: | MCA/SMC6/R/2/SMC2580 |
| Organisation/ person making representation: | [Redacted], Cornwall Countryside Access Forum (CCAF) |
| Route section(s) specific to this representation: | SMC-6-S058 to SMC-6-S072 |
| Other reports within stretch to which this representation also relates: | N/A |
| Representation in full | |
| <p>The current route uses a path immediately adjacent to a minor road and the minor road itself, none of this length with any sea views or coastal character, for a distance approaching 2 km. The proposal takes the route seaward and well away from the road. The sea views and the coastal environment on the proposed route are excellent. This change is very welcome and strongly supported.</p> | |
| Natural England's comments | |
| <p>We welcome the positive engagement from CCAF during the development of our proposals and their supportive comments.</p> | |
| Relevant appended documents (see section 5): N/A | |

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| Representation number: | MCA/SMC6/R/6/SMC2588 |
| Organisation/ person making representation: | [Redacted], Rambers Association Cornwall |
| Route section(s) specific to this representation: | SMC-6-S027 to SMC-6-S028 |
| Other reports within stretch to which this representation also relates: | N/A |
| Representation in full | |
| <p>We suggest that these sections should be subject to rollback. There was a cliff fall in the winter 2013/ 2014 on SMC-6-S028FP which resulted in temporary fencing being erected to keep walkers away from the cliff edge and a minor realignment of the path. If this has happened recently, there is a good chance of it happening in the future on nearby parts of the cliff.</p> | |
| Natural England's comments | |
| <p>The Environment Agency data that we use to identify areas likely to be affected by erosion did not indicate that erosion was likely to take place in the area, nor was it mentioned by the Access Authority.</p> <p>The land on which route section SMC-6-S028 is aligned is owned by the Access Authority. Natural England would not oppose adding rollback to this stretch and adjacent stretches in light of the anecdotal evidence provided.</p> | |

Relevant appended documents (see section 5): N/A

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| Representation number: | MCA/SMC6/R/7/SMC2588 |
| Organisation/ person making representation: | [Redacted], Ramblers Association Cornwall |
| Route section(s) specific to this representation: | SMC-6-S058 to SMC-6-S072 |
| Other reports within stretch to which this representation also relates: | N/A |
| Representation in full | |
| <p>We strongly support the route adopted in the region of the Murrayton Monkey Sanctuary. It avoids the rather monotonous road walking of the present South West Coast Path and will have much more of an atmosphere of the coastal margin. We really look forward to walking again this area of great character which has been denied to the public for several years.</p> | |
| Natural England's comments | |
| <p>We welcome the positive engagement from Ramblers Cornwall during the development of our proposals and their supportive comments.</p> | |
| Relevant appended documents (see section 5): N/A | |

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| Representation number: | MCA/SMC6/R/8/SMC0989 |
| Organisation/ person making representation: | [Redacted] |
| Route section(s) specific to this representation: | SMC-6-S002 to SMC-6--S003 |
| Other reports within stretch to which this representation also relates: | N/A |
| Representation in full | |
| <p>Map 6a fails to show some of the properties (buildings) that extend up the existing tarmacked foot path and then foot path track leading out of Polperro (known as 'The Warren'). Garden plots are shown without their houses. Privately owned land that extends seaward beyond the footpath is also omitted. I note that later built residential properties in Brent Field are clearly marked. For future reference this seems to be an omission that should be corrected.</p> | |
| Natural England's comments | |

We welcome this representation. We do not produce our own base maps, we use a layer provided to us by Ordinance Survey, we will pass your comments on to them.

Relevant appended documents (see Section 5):

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| Representation number: | MCA/SMC7/R/1/SMC2580 |
| Organisation/ person making representation: | [Redacted], Cornwall Countryside Access Forum |
| Route section(s) specific to this representation: | SMC-7-S003 to SMC-7-S014 |
| Other reports within stretch to which this representation also relates: | N/A |
| Representation in full | |
| <p>The proposed route here is seaward of the current line. It gives consistent sea views and is much safer, avoiding as it does a lengthy and sometimes narrow and winding trafficked road. Because of potential difficulties on occasions at very high tides, the old route is presented as an alternative. The new route is welcomed and supported, for the reasons set out above, and the existence of the alternative recognised as appropriate. The only other comment is that the new route misses all the facilities of Downderry, so that where the alternative or access routes to the alternative are signed it would be useful to include mention of facilities.</p> | |
| Natural England's comments | |
| <p>We welcome the positive engagement from the South West Coast Path Association during the development of our proposals and their supportive comments. We will work with the Access Authority to ensure that any new signage is appropriate for the area.</p> | |
| Relevant appended documents (see section 5): N/A | |

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| Representation number: | MCA/SMC7/R/2/SMC2580 |
| Organisation/ person making representation: | [Redacted], Cornwall Countryside Access Forum |
| Route section(s) specific to this representation: | SMC-7-S057 |

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| Other reports within stretch to which this representation also relates: | N/A |
| Representation in full | |
| <p>On this length the route follows the “Military Road”, a well-used public road with no footway. There is thus a potential traffic hazard to walkers and, although generally giving good views, this safety issue is not ideal for a National Trail. It is accepted that there is a history of cliff instability on the seaward side of the road, coupled with the existence of numerous private cabins, and that this may make it difficult to position a walking route here. However, for at least part of the length there appears to be potential for a route on the landward side which, given the topography, would still provide good sea views without the traffic danger.</p> | |
| Natural England’s comments | |
| <p>Natural England has worked with the Access Authority and the National Trust, which owns some of the land on Military Road, to take the proposed route off the road wherever possible.</p> | |
| Relevant appended documents (see section 5): N/A | |

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| Representation number: | MCA/SMC7/R/5/SMC2588 |
| Organisation/ person making representation: | [Redacted], Ramblers Association Cornwall |
| Route section(s) specific to this representation: | SMC-7-S043 to SMC--S046 |
| Other reports within stretch to which this representation also relates: | N/A |
| Representation in full | |
| <p>The present South West Coast Path National Trail in the Tregantle Fort area has a route to seaward of the Fort which is available much of the time and an alternative route along the road when firing takes place. The route to seaward of the fort meets the requirements of the Coastal Access Scheme much better than the route on the landward side of the fort in all respects other than that it is not available all the time. We therefore recommend that the seaward route is adopted as the England Coast Path with the landward route available as an alternative in the same way as the Seaton to Donderry sections proposal. The report gives no reason for the decision to adopt the line of SMC-7-S043 to 46 as the England Coast Path and apparently abandon the seaward route.</p> <p>Paragraph 7.2.5 of the report states that the SWCP will be realigned to the route adopted by the England Coast Path. If for any reason this alternative proposal fails to meet the requirements of the Scheme, we recommend that the path to seaward of the Fort is retained as part of the South West Coast Path.</p> | |
| Natural England’s comments | |
| <p>8.22.1 of the Approved Coastal Access Scheme, states that “Coastal access will not compromise defence needs. Much land used for defence purposes on the coast is</p> | |

excepted from the access rights under the existing CROW rules, being land regulated by byelaws under section 14 of the Military Lands Act 1892 or section 2 of the Military Lands Act 1990. On any other land used for defence purposes where access rights would apply on the coast, the Secretary of State may use the powers under section 28 of CROW to restrict or exclude access as necessary for the purposes of defence or national security.”

Tregantle Fort is a Ministry of Defence coastal firing range that is covered by The Tregantle Ranges Byelaws 1982 and therefore Natural England is not able to propose alignment through it. This is the case even though a ‘secondary’ route for the SWCP is aligned through the ranges on a permissive basis when the range is not being used by the Ministry of Defence. We understand this permissive arrangement will continue unaffected by our proposals.

In our reports for the most part we state that where we have proposed improvements to the existing route line of the SWCP, or where its walked line differs slightly from the route originally approved by the Secretary of State because the path has evolved over time to cope with coastal erosion or other processes, we intend to use a separate variation report to change the route of the SWCP to reflect the approved line of the England Coast Path.

However in the exceptional situation at Tregantle Fort, we think it is right for the ‘secondary’ SWCP route through the land to remain in place, on a different alignment from the ECP route. We omitted to address this point in our proposals. We ask that if the Secretary of State is minded to approve the proposals in their current form, he should make it clear he understands that it is Natural England’s intention that the ECP and the ‘secondary’ route of the SWCP through the ranges should remain separate.

Relevant appended documents (see section 5):

- 5f MCA/SMC7/R/5/SMC2588 Map showing the route of the South West Coast Path from Magic Maps (Defra) website.

4. Record of ‘other’ representations and Natural England’s comments on them

| Representations containing similar or identical points | |
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| Representation ID | Organisation/ person making representation: |
| MCA/SMC1/R/5/SMC2717 | [Redacted], South West Coast Path Association |
| MCA/SMC1/R/8/SMC2321 | Gerrans Parish Council |
| Name of site: | Amsterdam Point |
| Report map reference: | Map SMC 1a: St Mawes to Carricknath Point |
| Route sections on or adjacent to the land: | SMC-1-S012 to SMC-1-S013 |
| Other reports within stretch to which this representation also relates | N/A |

Summary of point: Those making representations would prefer the route to be aligned around Amsterdam Point.

Natural England's comment: 4.7.1 of the Approved Coastal Access Scheme, states that "where there is an existing national trail along the coast - or another clear walked line along the coast, whatever its status - we normally propose to adopt it as the line for the England Coast Path"

However in making our proposals we considered carefully opportunities to improve the line of the existing South West Coast Path and have made proposals to that effect in 12 places along this stretch. In doing so we had to assess whether the alignment would deliver significant improvements in terms of the other statutory criteria and principles set out in this Scheme, as well as whether the new alignment makes sense in terms of cost to the public purse.

Our reasoning for the proposed alignment is set out in Table 1.3.3 of report *SMC 1: St Mawes to Nare Head*: the alignment of the route was proposed after contact with the landowner and Access Authority. There was concern by the Access Authority about the potential cost of ongoing maintenance of establishing a route around Amsterdam Point. The existing walked route of the South West Coast Path was preferred, which has good views of the sea, is more direct and has a strong coastal feel.

Relevant appended documents (see Section 5): N/A

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| Representation ID: | MCA/Whole Stretch/R/1/SMC2715 |
| Organisation/ person making representation: | [Redacted] |
| Name of site: | Whole stretch |
| Report map reference: | |
| Route sections on or adjacent to the land: | |
| Other reports within stretch to which this representation also relates | SMC 2, SMC 3, SMC 4, SMC 5, SMC 6, SMC 7, SMC 8 |
| Summary of representation: The route should not be called England Coast Path in Cornwall. | |
| Natural England's comment: As set out on page 6 of the St Mawes to Cremyll Overview the trail in Cornwall will continue to be branded as the South West Coast Path and not specifically the England Coast Path. | |
| Relevant appended documents (see Section 5): N/A | |

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| Representation ID: | MCA/SMC1/R/4/SMC2717 |
| Organisation/ person making representation: | [Redacted], South West Coast Path Association |
| Name of site: | Percuil Ferry |
| Report map reference: | Map SMC 1a: St Mawes to Carricknath Point |
| Route sections on or adjacent to the land: | SMC-1-S002 and SWC-1-S003 |
| Other reports within stretch to which this representation also relates | N/A |
| Summary of representation: If the full-time service is provided, the alignment is supported. If the ferry ceases to be full time, then Natural England must be required to adhere to their commitment to review the situation in order that the Scheme's continuity requirement be met. | |
| Natural England's comment: See paragraph 1.2.17 of report <i>SMC 1: St Mawes to Nare Head</i> which states that "The route of the trail in this report incorporates the use of a ferry from St Mawes to Place. Should the ferry service become unsuitable for the purpose, Natural England will review the trail alignment and, if appropriate, will prepare a separate variation report to the Secretary of State to ensure an uninterrupted journey for this part of the coast". | |
| Relevant appended documents (see Section 5): N/A | |

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| Representation ID: | MCA/SMC1/R/6/SMC2717 |
| Organisation/ person making representation: | [Redacted], South West Coast Path Association |
| Name of site: | Nare Hotel |
| Report map reference: | Map SMC 1h: Pendower Beach to Carne |
| Route sections on or adjacent to the land: | SMC-1-S102 and SMC-1-S103 |
| Other reports within stretch to which this representation also relates | N/A |

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| Summary of representation: It is accepted that the original line of the SWCP seaward of the hotel is not viable long-term. In these circumstances the proposed route, with its slight change in alignment from the current permissive walked line, is the most suitable available. |
| Natural England's comment: We welcome the positive engagement from SWCPA during the development of our proposals and their supportive comments. |
| Relevant appended documents (see Section 5): N/A |

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| Representation ID: | MCA/SMC1/R/8/SMC2321 |
| Organisation/ person making representation: | [Redacted], Gerrans Parish Council |
| Name of site: | Place Cove |
| Report map reference: | Map SMC 1a: St Mawes to Carricknath Point |
| Route sections on or adjacent to the land: | SMC-1-S007 to SMC-1-S010 |
| Other reports within stretch to which this representation also relates | N/A |
| Summary of representation: Gerrans Parish Council would like the route to follow the sea wall at Place House. | |
| Natural England's comment: The sea wall in front of Place House is very narrow and we feel that it is not appropriate or safe to walk along, nor would be a route beside the sea wall as this would mean walking in the garden of Place House. The proposed route behind Place House follows a public right of way, and the existing South West Coast Path, via St Anthony's Church which is a place of interest. | |
| Relevant appended documents (see Section 5): N/A | |

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| Representation ID: | MCA/SMC3/R/2/SMC2717 |
| Organisation/ person making representation: | [Redacted], South West Coast Path Association |
| Name of site: | Pentewan |
| Report map reference: | Map SMC 3g: Tregiskey to Pentewan |

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| Route sections on or adjacent to the land: | SMC-3-S072 to SMC 3-S075 |
| Other reports within stretch to which this representation also relates | N/A |
| Summary of representation: The proposed alignment of the route has no sea views. There is a private bridge across the St Austell River which could be used, and a more seaward route would be reasonably direct. | |
| Natural England's comment: See <i>Table 3.3.3 Other options considered</i> of report SMC 3: Dodman Point to Drennick for our reasons for the proposed route. The steep cliffs at the southern end of Pentewan Beach and the St Austell River to the north of the beach mean that a beach route would not be practical. There is a private bridge owned by Pentewan Sands, over the St Austell River. The bridge is currently locked daily at 4:30pm and at weekends for security reasons. There are business units north of the bridge which would mean negotiating access with the owners. A route through the holiday park would need to start at the entrance to the holiday park, due to the unstable nature of the cliffs to the south, which is midway along the beach. The holiday park itself is landscaped in places, so sea views in these areas would be limited. Overall concluded that overall the proposed route struck the best balance in terms of the criteria described in chapter 4 of the Coastal Access Scheme. | |
| Relevant appended documents (see Section 5): N/A | |

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| Representation ID: | MCA/SMC4/R/3/SMC2717 |
| Organisation/ person making representation: | [Redacted], South West Coast Path Association |
| Name of site: | Carrickowel Point |
| Report map reference: | Map SMC 4b: Gwendra Point to Carrickowel Point Map SMC 4c: Carrickowel Point to Gull Island |
| Route sections on or adjacent to the land: | SMC-4-S031 to SMC-4-S033 |
| Other reports within stretch to which this representation also relates | N/A |
| Summary of representation: The South West Coast Path Association propose that the route should go around Carrickowel Point. | |

Natural England's comment: 4.7.1 of the Approved Coastal Access Scheme, states that "where there is an existing national trail along the coast - or another clear walked line along the coast, whatever its status - we normally propose to adopt it as the line for the England Coast Path."

In making our proposals we considered carefully opportunities to improve the line of the existing South West Coast Path, which is also a public right of way in this area, and have made proposals to that effect in 12 places along this stretch. In doing so we had to assess whether the alignment would deliver significant improvements in terms of the other statutory criteria and principles set out in this Scheme, as well as whether the new alignment makes sense in terms of cost to the public purse. The headland is used by the public as spreading room and that will continue. In discussion with the Access Authority it was decided to propose that the alignment of the route remains on the most seaward public right of way due to significant erosion events on the headland.

Relevant appended documents (see Section 5): N/A

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| Representation ID: | MCA/SMC4/R/4/SMC2717 |
| Organisation/ person making representation: | [Redacted], South West Coast Path Association |
| Name of site: | Appletree Point |
| Report map reference: | Map SMC 4c: Carrickowel Point to Gull Island |
| Route sections on or adjacent to the land: | SMC-4-S052 to SMC-4-S054 |
| Other reports within stretch to which this representation also relates | N/A |
| Summary of representation: The South West Coast Path Association propose that the route should go around Appletree Point. | |
| <p>Natural England's comment: 4.7.1 of the Approved Coastal Access Scheme, states that "where there is an existing national trail along the coast - or another clear walked line along the coast, whatever its status - we normally propose to adopt it as the line for the England Coast Path."</p> <p>In making our proposals we considered carefully opportunities to improve the line of the existing South West Coast Path, which is also a public right of way, and have made proposals to that effect in 12 places along this stretch. In doing so we had to assess whether the alignment would deliver significant improvements in terms of the other statutory criteria and principles set out in this Scheme, as well as whether the new alignment makes sense in terms of cost to the public purse.</p> | |
| Relevant appended documents (see Section 5): N/A | |

| Representations containing similar or identical points | |
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| Representation ID | Organisation/ person making representation: |
| MCA/SMC6/R/3/SMC2717 | South West Coast Path Association |
| MCA/SMC6/R/5/SMC2615 | [Redacted] |
| Name of site: | Talland |
| Report map reference: | Map SMC 6b: Talland to Hore Stone |
| Route sections on or adjacent to the land: | SMC-6-S013 |
| Other reports within stretch to which this representation also relates | N/A |
| Summary of point: The South West Coast Path Association and [redacted] feel that the proposed route on this section should not be aligned to a minor road east of Talland due to safety issues. | |
| Natural England's comment: See <i>Table 6.3.3 Other options considered</i> of report SMC 6: Polperro to Seaton which sets out our reasons for proposing the alignment of the route. The owner of the field seaward of the proposed trail did not want the route to pass through it as they use the site as a wedding and events venue. The road is quiet and is wide enough to be safe for walkers as vehicles drive slowly and are aware of the presence of walkers. No parking is permitted on the road, at any time between 1 st June and 30 th September. | |
| Relevant appended documents (see Section 6): | |
| <ul style="list-style-type: none"> - 5g MCA/SMC6/R/5/SMC2615 - 5h MCA/SMC6/R/5/SMC2615 | |

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| Representation ID: | MCA/SMC6/R/4/SMC2717 |
| Organisation/ person making representation: | [Redacted], South West Coast Path Association |
| Name of site: | Bodigga Cliff to Keveral Beach |
| Report map reference: | Map SMC 6f: Bodigga Cliff to Keveral Beach |
| Route sections on or adjacent to the land: | SMC-6-S058 to SMC-6-S072 |

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| Other reports within stretch to which this representation also relates | N/A |
| Summary of representation: The South West Coast Path Association welcome and strongly support the proposed route between Bodigga Cliff and Keveral Beach. | |
| Natural England's comment: We welcome the positive engagement from the South West Coast Path Association during the development of our proposals and their supportive comments. | |
| Relevant appended documents (see Section 5): N/A | |

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| Representation ID: | MCA/SMC7/R/3/SMC2717 |
| Organisation/ person making representation: | [Redacted], South West Coast Path Association |
| Name of site: | Downderry |
| Report map reference: | Map SMC 7a: Seaton to Downderry |
| Route sections on or adjacent to the land: | SMC-7-S003 to SMC-7-S014 |
| Other reports within stretch to which this representation also relates | N/A |
| Summary of representation: The route in Downderry is welcomed and supported, as is the optional alternative. South West Coast Path Association suggests that any signage should include information about local facilities. | |
| Natural England's comment: We welcome the positive engagement from the South West Coast Path Association during the development of our proposals and their supportive comments. We will work with the Access Authority to ensure that any new signage is appropriate for the area. | |

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| Representation ID: | MCA/SMC7/R/4/SMC2717 |
| Organisation/ person making representation: | [Redacted], South West Coast Path Association |
| Name of site: | Military Road, Whitsand Bay |

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| Report map reference: | Map SMC 7h: Freathy to Tregonhawke |
| Route sections on or adjacent to the land: | SMC-7-S057 |
| Other reports within stretch to which this representation also relates | N/A |
| Summary of representation: South West Coast Path Association would like the proposed route to be taken off Military Road at Whitsand Bay as much as possible and suggested using the landward side of the road. | |
| Natural England's comment: Natural England has worked with the Access Authority and the National Trust, which owns some of the land on Military Road, to take the proposed route off the road wherever possible. | |
| Relevant appended documents (see Section 5): N/A | |

5. Supporting documents

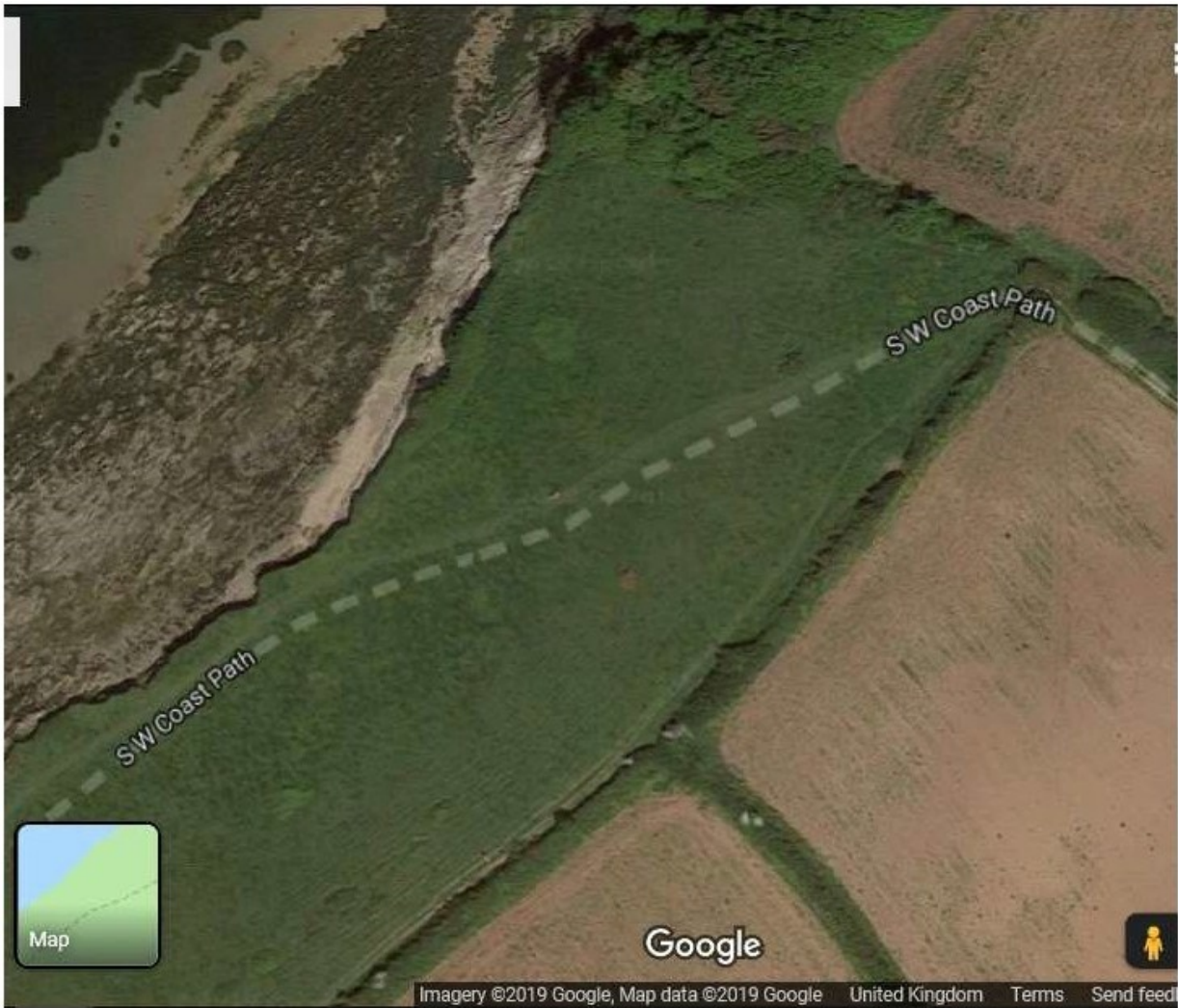
5a. MCA/SMC1/R/7/SMC2588 The present route of the South West Coast Path from Magic website



5b MCA/SMC1/R/7/SMC2588 Aerial photograph 2005 showing the trampled route, taken from Cornwall Council website



5c MCA/SMC1/R/7/SMC2588 Aerial photograph 2019 showing the trampled route, taken from Google Maps



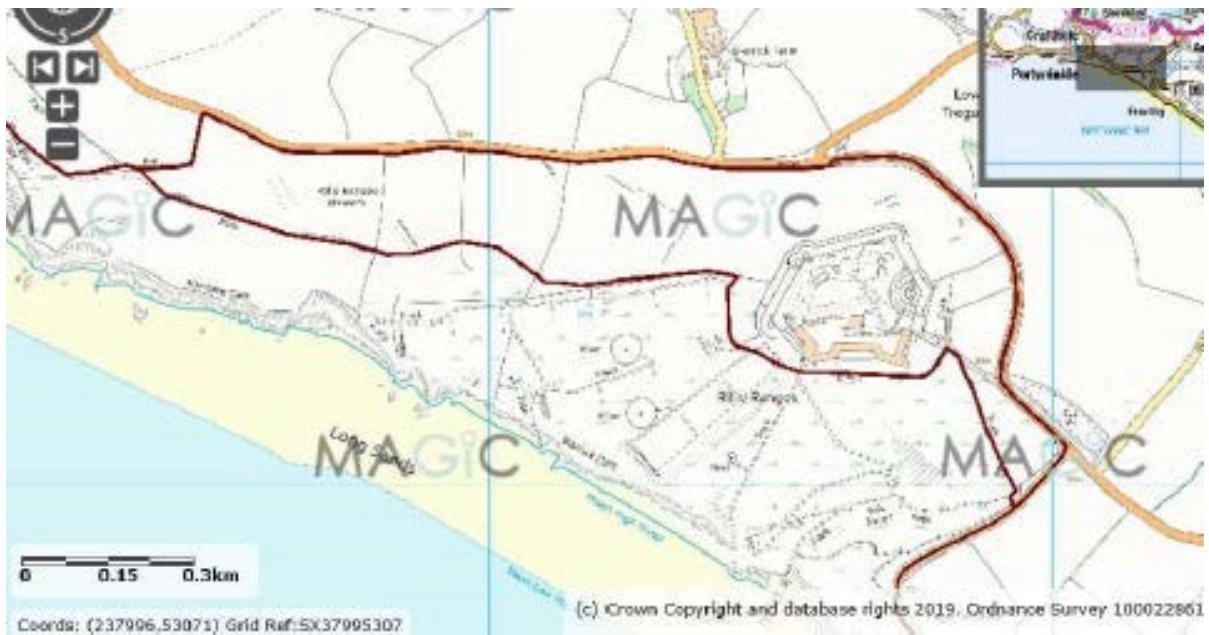
5[d]a MCA/SMC3/R/3/SMC2588 Pentewan aerial photograph showing possible improved route in blue



5[e]b MCA/SMC3/R/3/SMC2588 View of the south end of Sconhoe Beach showing the cliff height reducing to almost nothing at the rear of the caravan site



5[f]a MCA/SMC7/R/5/SMC2588 Map showing the route of the South West Coast Path from Magic Maps (Defra) website.



5[g]a MCA/SMC6/R/5/SMC2615

This image has been redacted from this record due to containing personal information.

5[h]b MCA/SMC6/R/5/SMC2615

This image has been redacted from this record due to containing personal information.