

Coastal Access – Aust to Brean Down lengths ABD2 to ABD5 and ABD7 to ABD10



Representations with Natural England's comments

July 2020

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1. Introduction

This document records the representations Natural England has received on the proposals in length reports ABD2 to ABD5 and ABD7 to ABD10 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 Aust to Brean Down they are included here in so far as they are relevant to lengths ABD2 to ABD5 and ABD7 to ABD10 only.

2. Background

Natural England's compendium of reports setting out its proposals for improved access to the coast from Aust to Brean Down, comprising an overview and 10 separate length reports, was submitted to the Secretary of State on 25 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 47 representations pertaining to length reports ABD2 to ABD5 and ABD7 to ABD10, of which 15 were made by organisations or individuals whose representations must be sent in full to the Secretary of State in accordance with paragraph 8(1)(a) of Schedule 1A to the National Parks and Access to the Countryside Act 1949. These 'full' representations are reproduced in Section 4 in their entirety, together with Natural England's comments. Also included in Section 4 is a summary of the 32 representations made by other individuals or organisations, referred to as 'other' representations, together with Natural England's comments. Section 5 contains the supporting documents referenced against the representations.

3. Layout

The representations and Natural England's comments on them are separated below into the lengths against which they were submitted. Each length below contains the 'full' and 'other' representations submitted against it, together with Natural England's comments. Where representations refer to two or more lengths, they and Natural England's comments will appear in duplicate under each relevant length. Note that although a representation may appear within multiple lengths, Natural England's responses may include length-specific comments which are not duplicated across all lengths in which the representation appears. The supporting documents in section 5 are also separated into the lengths against which they were submitted.

4. Representations and Natural England's comments on them

Length Report ABD2

Full representations

Representation number:	<i>MCA / ABD Stretch/ R/6/ ABD1417</i>
Organisation/ person making representation:	<i>The Ramblers (Avon Area)</i>
Route section(s) specific to this representation:	-
Other reports within stretch to which this representation also relates:	<i>ABD1 and ABD3</i>
Representation in full	
<p>The various parties involved in developing these proposals should be commended for the amount of work that has gone into reaching this stage so far and Natural England are to be commended for publishing a very comprehensive set of proposals. The report identifies various improvements to provide better access, path surfaces and protection to sensitive areas of habitat and, from a user's perspective, these proposals seem reasonable. This is a significant opportunity to improve public access to this stretch of coast, with benefits for residents, businesses and visitors. More people will have easier and more extensive access to the coastal environment for open-air recreation, which is widely acknowledged to have significant benefits for human health and well-being.</p> <p>An area of concern relates to the Severn Way flood defence improvements.</p> <p>Site: Land Off New Passage Road, And The A403 (Severn Road) South Gloucestershire Severnside</p> <p>Description: The Avonmouth Severnside Enterprise Area (ASEA) ecological mitigation and flood defence scheme includes works at three sites within South Gloucestershire, as follows:</p> <ul style="list-style-type: none"> - Area 1 Scheme (Aust to Severn Beach - Severnside) - Construction of new flood defence walls, embankments and flood gates, raising of existing flood defence walls and embankments, and improvements to the Cake Pill Outfall, Chestle Pill Outfall, and Cotteralls Pill Outfall. - Area 3A Scheme (Severn Beach Railway - North) - Construction of new flood defence walls and embankments, raising of existing flood defence walls, and improvements to the New Pill Outfall. 	

- Area 5 Scheme (Northwick) - Creation of an ecological mitigation area comprising 41.9ha freshwater seasonally (winter months) wet grassland habitat and 14.49ha of permanent open water in the form of ponds.

What arrangements are in place to ensure improvements along the Severn Way are coordinated between Natural England, the Environment Agency and their Contractors?

Natural England's comments

We welcome the representation from the Avon Area Ramblers. We thank them for the interest they have taken in the development of our coastal access proposals for the coast between Aust and Avonmouth and for expressing their support for the final proposals, including the measures proposed to protect wildlife and supporting habitats. We ask that the Secretary of State note these views and the expected benefits from the coast path in terms of public enjoyment, physical health and well-being.

The representation raises a concern with respect to planned flood defence improvements between Aust and Avonmouth known as the Avonmouth-Sevenside Flood Defence and Ecological Mitigation Project (ASEA). The ASEA works will affect parts of the proposed England Coast Path route. The affected parts follow part of the existing promoted long-distance route called the Severn Way between Old Passage on map ABD1a and Chittinging Industrial Estate on map ABD3a – including the proposed route in [report ABD2](#).

We agree that close working relationships will be necessary between Natural England, the Environment Agency and their contractors carrying out the ASEA project, to which we would add South Gloucestershire and Bristol City Councils which are also partners in both the England Coast Path and ASEA. This will help avoid any conflict between the flood defence works and recreational use, ensure impacts on wildlife are minimised and ensure efficient operations for both projects. All the organisations involved are aware of this requirement and a meeting has already been held recently to discuss expected timescales and ways of working.

Of the specific elements of the flood defence improvement programme listed in the representation, only works in Area 3A (Severn Beach railway north) are expected to directly affect access along the proposed England Coast Path route in report ABD2. Area 1 (Aust to Severn Beach) would affect the proposed route in report ABD1 and we consider it further in our comments on representations about that report. Area 5 (Northwick mitigation area) will not directly affect the Severn Way or the England Coast Path.

Area 3A works will affect access along route sections ABD-2-S010 to ABD-2-S012 (map ABD 2b) and ABD-2-S018 to ABD-2-S020 (map ABD 2c). We refer the Secretary of State to the Environment Agency representation below and to our comments about it; there we explain in further detail potential impacts and how we intend to mitigate them with cooperation from the ASEA project team.

Representation number:	<i>MCA / ABD Stretch/ R/7/ ABD1899</i>
Organisation/ person making representation:	<i>Environment Agency</i>
Route section(s) specific to this representation:	<i>ABD-2-S010 to ABD-1-S012, ABD-1-S018 to ABD-1-S020</i>
Other reports within stretch to which this representation also relates:	<i>ABD1, ABD4, ABD6, ABD7, ABD10</i>

Representation in full

The Environment Agency was established in 1996 to protect and improve the environment. We have an operational responsibility for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea, as well as being a coastal erosion risk management authority. Additionally, we have a statutory duty under the Water Resources Act 1991 and the Environmental Permitting Regulations (England and Wales) 2016 to assess and review any works done within 8 metres of fluvial main river and 16 metres of tidal defence.

Whilst, we have no “in principle” objections to the proposals subject to the comments outlined in this response, we will need to assess the acceptability of any detailed matters through the Flood Risk Activity Permit (FRAP) process detailed below.

Flood Risk Activity Permit

The proposals may require a permit under the Environmental Permitting (England and Wales) Regulations 2010 from the Environment Agency for any proposed works or structures, in, under, over or within sixteen metres of the top of the bank of the Severn Estuary, designated a ‘main river’. An Environmental Permit may also be required for any works on, or within sixteen metres of the landward toe of any Environment Agency designated flood defence structure(s). It is common in larger river systems, or tidal areas, for Environment Agency flood defences to be located in excess of 8 metres from the main channel or coastline, and greater than 20 metres in some instances. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt.

A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. To discuss the scope of the controls please contact the Environment Agency on 03708 506 506 or email: bridgwater.frap@environment-agency.gov.uk .

To find the location of Environment Agency flood defence structure and main rivers, together with further information, please refer to our Flood Maps on gov.uk. We would like to agree the location of any signage and new gates you intend to install, which could be done through the Flood Risk Activity Permit process discussed above.

It must be noted that any works in proximity of a watercourse other than a main river, may be subject to the regulatory requirements of the Lead Local Flood Authority/Internal Drainage Board (e.g. Lower Severn Internal Drainage Board).

Flood Risk considerations

With regards to the specific sections of the coastal path, we offer the following comments. We ask that any detailed proposals fully address the points raised, to ensure the integrity of coastal defences is not adversely impacted by the coastal path, in the interest of flood risk management.

[At this point in the representation there are detailed comments relating to several reports within the Aust to Brean stretch. Here we include only those relating to this report. Others are set out in full in Natural England's comments on representations about the report to which they relate.]

ABD2- New Passage to New Pill Gout

With reference to route Sections ABD-2-S010 FP to ABD-2-S012 FP, please clarify the exact alignment of the footpath on the south end of Binn Wall at Severn Beach. Will it be on the crest of the earth embankment or on the slightly lower level concrete revetment? We advise that we are constructing a low level wall to increase the height of the flood defence at this location.

With reference to route sections ABD-2-S018 FP to ABD-2-S020 FP. We note the proposal to keep the existing alignment of the path. We advise that our ASEA scheme will involve works to and around the New Pill outfall structure. We can share, for information, the final detailed design drawings when produced. ABD-1 – Severn Bridge to New Passage.

Fisheries, Biodiversity and Geomorphology

We note within the Aust to Brean Down Habitats Regulations “table 30 other live plans or projects”, the Avonmouth Severnside Enterprise Area (ASEA) Ecology and Mitigation Flood Defence Scheme and the Environment Agency's flood defence maintenance programmes are included.

We note that assent from Natural England for the flood defence maintenance programme and Habitats Regulations Assessment (HRA) is renewed on an annual basis. We are seeking a 3 year agreement next year, so it is hoped assent will be sought on a 3 yearly basis in future (for the Bristol Avon catchment). We note we will have to assess in subsequent years how any residual effects from the programme work could interact with residual effects from the Coast Path.

Although identified as having insignificant and combinable effects, the maintenance programme is not included in Table 31 'Risk of in-combination effects' within the Aust to Brean Down HRA, it is unclear whilst this is the case?

Please note in 2019 we received assent for North Somerset maintenance work between the period 2019 - 2021, so any in combination effects between the maintenance plan and coastal path would need to be considered when assent is reapplied for in 2022.

Groundwater and Contaminated Land

We understand that the trail will predominantly utilise existing infrastructure and there is therefore little likelihood of ground disturbance during construction that may encounter contamination or pose a risk to groundwater.

Should ground disturbance be required, the applicant should make appropriate consideration of potential contamination and follow the guidance 'Land Contamination: Risk Management found at <https://www.gov.uk/government/collections/land-contamination-technical-guidance> for managing the risks.

Next steps

We ask that any further correspondence/queries regarding the Coastal Access Report, are directed to the Wessex Sustainable Places team using the contact details below. We are principal Environment Agency point of contact.

Natural England's comments

The representation relates to all the proposals between Aust and Brean Down. Our comments below explain how we think it should be understood in that wider context and, where relevant, in relation to the specific proposals in report ABD2.

Natural England has worked closely with the Environment Agency throughout the development of the coastal access proposals for Aust to Brean Down. We thank them for their cooperation and advice to date and for the detailed comments in the representation. We welcome confirmation that the Agency has no 'in principle' objections to the proposed access arrangements and look forward to continued close cooperation during the establishment phase of the coast path project, should the Secretary of State approve a route.

Flood risk considerations and Flood Risk Activity Permits

We have a good understanding of the Agency's operational requirements at specific locations including those in this report. Our existing Agency contacts have made us aware of the requirement for to obtain a Flood Risk Activity Permit (FRAP) in relation to some works along the route prior to establishment. From our discussions to date, we anticipate that the Agency will permit all necessary works envisaged to establish the route between New Passage and New Pill Gout and expect that the Agency may place specific conditions on, for example, the timing or detailed specification of some works in order to ensure compliance with flood risk management. South Gloucestershire Council, the local access authority which will undertake the necessary works, is aware of the FRAP requirement and will acquire the necessary permits before any works commence.

Specific issues relating to report ABD2- New Passage to New Pill Gout

In our discussions with the Environment Agency we have explained what new and replacement infrastructure is likely to be necessary to facilitate pedestrian access along the route and envisage that the FRAP process will confirm that this can be realised without compromise to the flood defence structures, their repair or maintenance.

Flood defence improvements south of Severn Beach are planned between 2020 and 2025 as part of the Avonmouth-Severnside Flood Defence and Ecology Mitigation project (ASEA). ASEA was commissioned the Environment Agency, South Gloucestershire Council and Bristol City Council. Area 3A of the ASEA scheme will directly affect parts of the proposed route between Severn Beach and New Pill Gout as described below.

From recent discussions with the ASEA team we understand that the existing footpath along the sea defences will be subject to temporary diversions while flood defence works are undertaken. Should the Secretary of State approve the route proposed in the report, we envisage that the England Coast Path between Aust and Brean will become operational during this period and we will make any directions that are necessary to exclude access temporarily along affected parts of the route and to direct people along diversions agreed with ASEA and South Gloucestershire Council. In the interests of efficiency some physical establishment of the approved route may also be delayed until the final stages of the flood defence improvement works or after.

Sections ABD-2-S010 to ABD-2-S012 of the proposed route is an existing walked route along the concrete revetment known as Binn Wall. We have met the Environment Agency and clarified this. We understand that a low level wall will be constructed to increase the height of the flood defence at this location and that access along the proposed route of the England Coast Path will be disrupted. There is potential for a temporary diversion to the landward side of the works area and the ASEA team envisage that walkers may be directed along it until the works are complete.

Sections ABD-2-S018 to ABD-2-S020 of the proposed route is an existing walked route along the earth embankment to the pedestrian railway crossing at New Pill Gout. We understand that the ASEA scheme will involve works to and around the New Pill outfall structure and that access along the proposed route will be disrupted. There is no obvious potential to divert walkers at this location while the works take place, so the ASEA team is investigating a more inland diversion that would allow continuous access for long-distance walkers until the proposed route can be reopened.

Fisheries, Biodiversity and Geomorphology

In respect of our Habitats Regulations Assessment (HRA), we have clarified with the Agency that its flood maintenance programme is listed among the considerations on row 2, page 142 in table 31 of the HRA. The Environment Agency have since confirmed that they agree this to be the case.

We thank the Agency for clarifying its intention to consider any in combination effects between the maintenance programme and the coast path as part of its application to Natural England for assent in 2022.

Groundwater and Contaminated Land

We note the need to consider land contamination risk with respect to any ground disturbance necessary to establish the route. We thank the Agency for supplying the link

to the current guidance, which we will pass on to the local access authority coordinating path establishment.

Next steps

We note the requirement to direct any future queries through the Wessex Sustainable Places team and confirm to the Secretary of State that this new point of contact is now established.

Representation number:	<i>MCA / ABD Stretch/ R/8/ ABD1434</i>
Organisation/ person making representation:	<i>Joint Local Access Forum (Bath and North East Somerset, Bristol City and South Gloucestershire)</i>
Route section(s) specific to this representation:	-
Other reports within stretch to which this representation also relates:	<i>ABD1 and ABD3</i>

Representation in full

This representation is made on behalf of the Joint Local Access Forum (JLAF) for Bath & North East Somerset, Bristol City and South Gloucestershire. The JLAF's statutory function is to advise public bodies on matters relating to public access and the section of the route from Aust to Avonmouth Bridge lies within the JLAF's area.

The LAF support and acclaim the proposals for the England Coast Path. The various parties involved in developing these proposals should be commended for the amount of work that has gone into reaching this stage so far and Natural England are to be commended for publishing a very comprehensive set of proposals. The report identifies various improvements to provide better access, path surfaces and protection to sensitive areas of habitat and, from a user's perspective, these proposals seem reasonable. This is a significant opportunity to improve public access to this stretch of coast, with benefits for residents, businesses and visitors. A greater number of people will have easier and more extensive access to the coastal environment for open-air recreation, which is widely acknowledged to have significant benefits for human health and well-being.

There is a need for the necessary arrangements to be in place to ensure that improvements along the Severn Way from Aust to Avonmouth are coordinated between Natural England, the Environment Agency and their contractors. The JLAF wish to draw particular attention to the need for co-ordination in respect of the Area 1 Scheme, the Area 3A scheme and the Area 5 Scheme which are part of the Severn Way flood defence improvements (PT18/2505/R3F).

Natural England's comments

We welcome the representation from the Joint Local Access Forum. We thank the Forum for the interest it has taken in the development of our coastal access proposals for the coast between Aust and Avonmouth and for its support for the final proposals, including the measures proposed to protect wildlife and supporting habitats. We ask that the Secretary of State note these views and the expected benefits from the coast path in terms of public enjoyment, physical health and well-being.

The representation raises a concern with respect to planned flood defence improvements between Aust and Avonmouth, known as the Avonmouth-Sevenside Flood Defence and Ecological Mitigation project (ASEA). These works will affect parts of the proposed route in report ABD2. On this part of the coast the proposed route follows an existing promoted long-distance route called the Severn Way between Old Passage on map ABD1a and Chittington Industrial Estate on map ABD3a – including most of the proposed route in [report ABD2](#).

We agree that close working relationships will be necessary between Natural England, the Environment Agency and their contractors carrying out the ASEA project, to which we would add South Gloucestershire and Bristol City Councils which are also partners in both the England Coast Path and the flood defence improvement projects. This will help avoid any conflict between the flood defence works and recreational use, ensure impacts on wildlife are minimised and ensure efficient operations for both projects. All the organisations involved are aware of this requirement and a meeting has already been held recently to discuss expected timescales and ways of working.

Of the specific elements of the flood defence improvement programme listed in the representation, only works in Area 3A (Severn Beach railway north) are expected to directly affect access along the proposed England Coast Path route in report ABD2. Area 1 (Aust to Severn Beach) would affect the proposed route in report ABD1 and we consider it further in our comments on representations about that report. Area 5 (Northwick mitigation area) will not directly affect the Severn Way or the England Coast Path.

Area 3A works will affect access along route sections ABD-2-S010 to ABD-2-S012 (map ABD 2b) and ABD-2-S018 to ABD-2-S020 (map ABD 2c). We refer the Secretary of State to the Environment Agency representation above and to our comments about it; there we explain in further detail potential impacts and how we intend to mitigate them with cooperation from the ASEA project team.

Other representations

Representations containing similar or identical points

Representation ID	Organisation/ person making representation:
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<i>MCA/ABD Stretch/R/1/ABD1840</i>	<i>[Redacted]</i>
<i>MCA/ABD Overview/R/2/ABD1842</i>	<i>[Redacted]</i>
Name of site:	<i>Aust to Brean</i>
Report map reference:	-
Route sections on or adjacent to the land:	-
Other reports within stretch to which this representation also relates	<i>All reports between Aust and Brean Down</i>
<p>Summary of point:</p> <p>[Redacted] is a resident of North Somerset and Ward Councillor for Banwell and Winscombe, a short distance from the coast at Weston-super-Mare. [Redacted] is a local resident and walker. Both express support and enthusiasm for the coastal access proposals from Aust to Brean as a whole.</p> <p>[Redacted] anticipates that the path will promote tourism, sustainable travel and a more active lifestyle. [Redacted] points out that that sustainable travel should play a major part in finding solutions to the climate crisis declared by North Somerset Council and believes that the coast path can contribute to sustainable travel because it links several coastal towns and so may be used by commuters.</p> <p>[Redacted] looks forward in particular to walking a path along Woodspring Bay, part of the coast covered in report ABD6 where there is no existing path.</p>	
<p>Natural England's comment:</p> <p>We thank [redacted] and [redacted] for their enthusiastic responses to the coastal access proposals. We draw the Secretary of State's attention to the anticipated benefits of our coastal access proposals both with respect to sustainable travel and public enjoyment.</p>	

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:
<i>MCA/ ABD2/ R/1/ ABD1843</i>	<i>The Disabled Ramblers</i>
<i>MCA/ ABD2/ R/2/ ABD1843</i>	<i>The Disabled Ramblers</i>
<i>MCA/ ABD2/ R/3/ ABD1843</i>	<i>The Disabled Ramblers</i>
<i>MCA/ ABD2/ R/4/ ABD1843</i>	<i>The Disabled Ramblers</i>
<i>MCA/ ABD2/ R/5/ ABD1662</i>	<i>North Somerset Local Access Forum</i>
<i>MCA/ ABD2/ R/6/ ABD1605</i>	<i>Pilning and Severn Beach Parish Council</i>

<i>MCA/ ABD2/ R/7/ ABD1605</i>	<i>Pilning and Severn Beach Parish Council</i>
<i>MCA/ ABD2/ R/9/ ABD1605</i>	<i>Pilning and Severn Beach Parish Council</i>
<i>MCA/ ABD2/ R/11/ ABD1605</i>	<i>Pilning and Severn Beach Parish Council</i>
Name of site:	<i>New Passage to New Pill Gout</i>
Report map reference:	<i>ABD 2a, 2b and 2c</i>
Route sections on or adjacent to the land:	<i>Various – see summary below</i>
Other reports within stretch to which this representation also relates	-

Summary of points:

This group of representations all concern existing structures along the route which form barriers to use of the proposed route by people with reduced mobility in particular mobility scooter users. Those from the Disabled Ramblers and the North Somerset Local Access Forum advocate their removal or adjustment to facilitate access for these user groups. Those from Pilning and Severn Beach Parish Council include similar points but also include differences of view among councillors, with some who advocate the retention of barriers to prevent unauthorised use by motorcycles.

The Disabled Ramblers make several general remarks which are implicitly supported by the North Somerset Local Access Forum in its representation and in the general remarks it appends to its representation (which can be found in section 5 of this document).

- Natural England, in the Accessibility statement 2.2.10 in Report ABD 2, has not recognised that there is a significant and steadily increasing number of people with reduced mobility who use off-road mobility scooters and other mobility vehicles to enjoy routes on more rugged terrain including uneven grass and bare soil paths. The terrain in Report ABD 2 is suitable for this group of people.
- Natural England should take all reasonable steps needed to make the trail as easy as possible for disabled people and those with reduced mobility, and be mindful of British Standard BS5709: 2018 Gaps Gates and Stiles.
- In doing so it should reconsider the suitability of existing infrastructure that it has indicated in the report should be retained because in many cases this bars legitimate access for this group of people.

Some of these representations include detailed observations to explain why certain existing access infrastructure along the proposed route present barriers to mobility scooter users. In some cases the representations make specific recommendations to allow access by an individual with reduced mobility who is on their own, on their mobility scooter, and who wishes to have access at the same times of day that is afforded to walkers. These points are listed below in order from New Passage to New Pill Gout, with the views of parish councillors where given.

1. The tarmac path between New Passage and Severn Beach (route sections ABD-2-S001 to ABD-2-S006 on map ABD 2a) is suitable for mobility vehicle users but they can only get on to it at the southern (Severn Beach) end because there are barriers at the northern (New Passage) end at each of the three main entry points - see the three photos marked access point A, B and C in the representation MCA/ABD2/R/3/ABD1843 and included in section 5 of this document. The Disabled Ramblers request that one of these barriers is removed or replaced with a different structure that allows access for mobility scooter users.
2. The cycle chicane at the junction of route sections ABD-2-S007 and ABD-2-S008 on map ABD 2a prevents mobility scooter users from heading further south, or from reaching Severn Beach if approaching from the south – see photo in the representation MCA/ABD2/R/3/ABD1843 and included in section 5 of this document. The Disabled Ramblers request that the chicane is removed or replaced with a different structure that allows access for mobility scooter users. One parish councillor shared this view but another opposed it because the chicane discourages unauthorised motorcycle use.
3. There is a gate on the slope leading to the beach adjoining route section ABD-2-S008 on map ABD 2b, which impedes beach access by people with reduced mobility. One parish councillor recommends its removal, explaining that there are also bollards that prevent vehicle access to the beach, whilst another supports its retention because it discourages unauthorised motorcycle use.
4. The long concrete path south of Severn Beach (route sections ABD-2-S009 to ABD-2-S012 on map ABD 2b) is of restricted width, making it difficult for two mobility scooters to pass – see photos in the representation MCA/ABD2/R/4/ABD1843 and included in section 5 of this document. The Disabled Ramblers request passing places along the path or signs at either end warning of the restricted width.
5. There is a stile at route section ABD-2-S016 on map ABD 2c which is a barrier to access by people with reduced mobility. One councillor recommends its removal whilst another suggests it is replaced by a kissing gate or motorcycle barrier.
6. There is an existing footbridge at route section ABD-2-S016 may be a barrier to mobility scooters. The North Somerset Local Access Forum request that its width and load-bearing capacity is checked.
7. The kissing gates and steps at the pedestrian railway crossing (route sections ABD-2-S018 and ABD-2-S020) obstruct access by mobility scooter users and others with reduced mobility – see photos in the representation MCA/ABD2/R/1/ABD1843 and included in section 5 of this document.

The Disabled Ramblers undertakes to submit further recommendations to Natural England separately to be considered as part of the establishment works, which Natural England has since received.

The North Somerset Local Access Forum is not the local access forum for the area in which the affected land is situated and its representation about this report has therefore been treated as one of the other representations which in accordance with the legislation are to be summarised.

Natural England's comment:

We thank the Disabled Ramblers, the North Somerset Local Access Forum and the Pilning and Severn Beach Parish Council for their representations and in particular welcome the timely focus on adjustments for mobility scooter users.

The suggestions made concern the choice and design of existing and new structures along the proposed routes, should it be approved by the Secretary of State: they do not imply any modification of the proposed routes or the extent of the associated margin and the access rights within it.

We recognise that there have been recent innovations in the design of mobility scooters and that as a result mobility scooters are more versatile and in particular have much longer battery life.

We note that in finalising the schedule and specification of establishment works for any route approved by the Secretary of State, both Natural England and South Gloucestershire Council, the local access authority which will undertake the works, should take all reasonable steps needed to make the trail as easy as possible for disabled people and those with reduced mobility, having regard to British Standard BS5709: 2018 Gaps Gates and Stiles.

Since receiving these representations, we have further and more detailed suggestions from the Disabled Ramblers as to how best to fulfil this aspiration. We shared all these suggestions with South Gloucestershire Council.

Natural England and South Gloucestershire Council share the ambition to make the coast path accessible to mobility scooter users and in principle support suggestions made to achieve this. This is subject to practical considerations which may be raised by other interests in the land, including any requirements of the Flood Risk Activity Permit issued by the Environment Agency and the agreement of affected land owners, which must be sought before any works are undertaken.

Relevant appended documents (see Section 5):

From the Disabled Ramblers representation *MCA/ABD2/R/1/ABD1843*:

- Photograph illustrating use of mobility vehicle on uneven grass path.
- Photographs (2) of kissing gates at pedestrian railway crossing (route sections ABD-2-S018 and ABD-2-S020).

From the Disabled Ramblers representation *MCA/ABD2/R/3/ABD1843*:

- Photographs of access points A, B and C (references used by Disabled Ramblers in their representation)
- Photograph of cycle chicane at junction of ABD-2-S007 and ABD-2-S008 preventing onward access by people using mobility vehicles

From the North Somerset Local Access Forum representation *MCA/ ABD2/ R/3/ ABD1843*:

- General Comments on Accessibility for those with Limited Mobility

The Pilning and Severn Beach Parish Council attached to its representation a document entitled 'Coastal path comment version 2'. This summarised the views of some of its members on reports ABD1 and ABD 2. There were no further remarks of relevance to this report in the attachment and accordingly it is not included in section 5 of this document.

Representation ID:	<i>MCA/ ABD2/ R/5/ ABD1662</i>
Organisation/ person making representation:	<i>North Somerset Local Access Forum</i>
Name of site:	<i>New Passage to New Pill Gout</i>
Report map reference:	-
Route sections on or adjacent to the land:	-
Other reports within stretch to which this representation also relates	<i>All reports between Aust and Brean Down</i>
Summary of representation:	
<p>The North Somerset Local Access Forum makes several detailed points about access along the path for people with reduced mobility which are summarised in section 4 alongside similar and related points made by the Disabled Ramblers and Pilning and Severn beach Parish Council.</p> <p>The Forum also makes the following two general points which we address in our comments below:</p> <ul style="list-style-type: none"> • Whilst specific restrictions on dogs are in place for certain sections of the ECP, there should be an expectation that dogs should be kept under close control at all times • On-site signage and interpretation should only be used after very careful consideration of need and appropriateness to the location. Waymarks should only 	

be used where the route is not abundantly clear and/or where a potential safety hazard may be encountered

The North Somerset Local Access Forum is not the local access forum for the area in which the affected land is situated and its representation about this report has therefore been treated as one of the other representations which in accordance with the legislation are to be summarised.

Natural England's comment:

Access for people with dogs

Our approach to access by people with dogs is underpinned by the coastal access legislation, the principle of the 'least restrictive option' set out in section 6.3 of the [Coastal Access Scheme](#), and the specific interpretation of that principle at paragraphs 6.7.7 to 6.7.9 of the Scheme.

The default position on the England Coast Path is that people must keep dogs under effective control, although the precise legal requirement may be different where there are pre-existing access rights.

Access legislation defines effective control as meaning that the dog must either be:

- on a lead or:
- within sight of the person and the person remains aware of the dog's actions and has reason to be confident that the dog will return to the person reliably and promptly on the person's command.

It further requires that dogs must be on a lead at all times in the vicinity of livestock.

(See paragraph 6A of [Schedule 2 to the Countryside and Rights of Way Act 2000](#), as amended for the purposes of the coastal margin).

We think that effective control is a clearer and more easily understood expectation than the words 'close control', which are not further defined in law.

We know that many people seek opportunities to exercise their dogs off lead and there are many places at the coast where they may reasonably expect to do so. For these reasons we say that effective control is also a more appropriate general expectation than close control, provided people understand and can comply with its specific requirements.

We support the use of further local restrictions provided, in accordance with the least restrictive principle, there is a proven need and the restriction used is proportionate to that need. For example in report ABD6, we have proposed that dogs must be on leads at all times in several places in order to minimise disturbance to roosting and feeding waterbirds.

Signs

We agree with the Local Access Forum that waymarks, signs and interpretation should be used sparingly and after consideration of the need and suitability to the location. South Gloucestershire Council is advising us on the design and location of signs for this part of the route.

Fingerposts and small waymark discs are in our view necessary to signal the route and give walkers the clarity and confidence to follow it.

We also intend to install notices at various sensitive locations between New Passage and New Pill Gout asking people to keep to the path and to make sure their dog stays on the path too, using a lead if the dog cannot otherwise be relied upon to do so. The notices will in some cases be accompanied by information to stimulate interest in waterbirds and their conservation. This is necessary as part of our efforts to ensure that there is no overall increase in disturbance to roosting and feeding waterbirds on the estuary.

Representation ID:	<i>MCA/ ABD2/ R/8/ ABD1605</i>
Organisation/ person making representation:	<i>Pilning and Severn Beach Parish Council</i>
Name of site:	<i>Severn Beach</i>
Report map reference:	<i>ABD 2b</i>
Route sections on or adjacent to the land:	<i>ABD-2-S011 and ABD-2-S012</i>
Other reports within stretch to which this representation also relates	-

Summary of representation:

This representation concerns the exclusion or not of access rights to land which would be coastal margin seaward of route sections ABD-2-S011 and ABD-2-S012. It includes opposing views from two councillors. One recommended that access rights to all land seaward of the path should be excluded. No reason is given for this view. The other recommends that access rights to part of the area should be retained, as envisaged in the report, because it is used for quiet recreation.

Natural England's comment:

We propose that access to the intertidal flats seaward of the route in this report should be excluded to the extent shown on Directions Map 2A of [report ABD2](#), on the grounds that it is unsuitable for access as explained in paragraphs 2.2.15 to 2.2.16 of the report. However, we propose that a limited area on the seafront at Severn Beach should not be subject to the exclusion because it is traditionally used for informal recreation, as we explain in paragraph 2.2.17 of the report.

The proposal is in accordance with the approach set out in paragraphs 7.5.5 to 7.5.8 of the Coastal Access Scheme in relation to our use of the discretionary power to exclude access to areas of saltmarsh or flat that we are satisfied are unsuitable for access. In paragraph 7.5.8 the Scheme explains that we ask local interests to help us identify any areas that are suitable or unsuitable for public access, or that are already in use. In this instance we consulted Pilning and Severn Beach Parish Council to help us with this and our proposal reflects the advice or its representative.

Some land seaward of the proposed route is not saltmarsh or flat and cannot therefore be excluded on these grounds. Other seaward land is upper saltmarsh that we concluded is safe to walk on. The remainder is excluded, except for a narrow belt of flats below the seawall between the Prince of Wales (M4) Bridge and the southern end of Severn Beach, which is already used for recreation.

We maintain that the extent of the exclusion shown on Directions Map ABD2 is broadly correct. However, we have undertaken to meet a representative of the parish council to discuss it in detail. We ask the Secretary of State to note that as a result of those discussions the precise extent of the exclusion may differ from that shown on Directions Map ABD2.

Representation ID:	<i>MCA/ ABD2/ R/10/ ABD1605</i>
Organisation/ person making representation:	<i>Pilning and Severn Beach Parish Council</i>
Name of site:	<i>New Pill Gout</i>
Report map reference:	<i>ABD 2c</i>
Route sections on or adjacent to the land:	<i>ABD-2-S017 and ABD-2-S018</i>
Other reports within stretch to which this representation also relates	-
Summary of representation:	
Those councillors who expressed a view recommended that access rights should be excluded from land seaward of the route sections ABD-2-S017 and ABD-2-S018 on map ABD 2c for the benefit of wildlife and grazing animals.	
Natural England's comment:	
The representation refers to a belt of tall reed and upper saltmarsh between the proposed route and the lower saltmarsh and flats. Access rights to the lower saltmarsh	

and flats would be excluded under our proposal because we are satisfied that it is unsuitable for access – this is not challenged – but the upper saltmarsh and reed has different physical characteristics to the lower foreshore and has therefore not been deemed unsuitable. The proposal is in accordance with the approach set out in paragraphs 7.5.5 to 7.5.8 of the Coastal Access Scheme in relation to our use of the discretionary power to exclude access to areas of saltmarsh or flat for this reason.

The representation instead proposes that we exclude access to protect wildlife and grazing animals. Below we consider these two grounds separately.

So far as we are aware the area is not currently grazed. Were this to change in the future we would consider any application to exclude access rights in terms of the criteria in the Coastal Access Scheme, in particular sections 8.1 to 8.6 concerned with grazing animals.

In terms of nature conservation we would agree that the area is sensitive to disturbance because significant numbers of waterbirds roost there at high tide. The sensitivity of roosting waterbirds to disturbance is explained in more detail in section D2.4 of our published [Habitats Regulations Assessment \(HRA\)](#).

Part D3.2A of the HRA sets out our assessment of existing disturbance to waterbirds at this location and likely change as a result of the access proposals. There we explain why we do not expect any appreciable increase in disturbance as a result of the access proposals, in particular because the birds are screened from path users by the reed vegetation. Our assessment takes into account the proposal set out on page 3 of the report to install a notice at either end of this part of the path to promote the saltmarsh seaward of the path as a refuge for waterbirds and ask people to remain on the path in these areas and to keep their dogs on the path with them, using a lead if necessary. We maintain that it is not necessary to exclude access for nature conservation reasons at this location.

Representation ID:	<i>MCA/ ABD2/ R/12/ ABD1605</i>
Organisation/ person making representation:	<i>Pilning and Severn Beach Parish Council</i>
Name of site:	<i>New Pill Gout</i>
Report map reference:	<i>ABD 2c</i>
Route sections on or adjacent to the land:	<i>ABD-2-S022</i>

Other reports within stretch to which this representation also relates	-
Summary of representation:	
<p>This representation sets out councillors' views on the safety of the path where it meets the busy A403 at route section ABD-2-S022. One councillor suggests giving walkers better visibility of traffic as they arrive at the roadside by moving back the fence along the side of the road and erecting a warning sign. There is not consensus that this is necessary.</p> <p>There are some views about the route south of this point which forms part of the proposals in report ABD3. There is a suggestion that it should be upgraded to a cycle path but another councillor disagrees. There is also disagreement about the safety of crossing the road at this point, which leads to a different route already designated and promoted as a cycle route.</p>	
Natural England's comment:	
<p>We have discussed this representation with South Gloucestershire Council and concluded that walkers' visibility is sufficient at this point. South Gloucestershire Council are considering the option of a short barrier where the route meets the pavement to discourage anyone from crossing the road without checking carefully. We would be able to fund this as part of the establishment works if the Council concludes that it is desirable.</p> <p>Our access proposals do not confer any rights for cycles and there are no powers for us to confer cycle rights to the route south of this point as suggested in the representation. Accordingly these points do not seem to us material to the Secretary of State's considerations and we have passed them to South Gloucestershire Council and Bristol City Council for their information.</p>	

Representation ID:	<i>MCA / ABD Stretch/ R/9/ ABD1911</i>
Organisation/ person making representation:	<i>Wildfowl and Wetlands Trust (WWT)</i>
Name of site:	<i>Aust to Brean (whole stretch)</i>
Report map reference:	-
Route sections on or adjacent to the land:	-

Other reports within stretch to which this representation also relates

All reports within stretch

The Wildfowl & Wetlands Trust (WWT) is the UK's leading wetland conservation charity, with a vision of a world where healthy wetland nature thrives and enriches lives. It works across the UK and internationally to conserve, restore and create wetlands, save wetland wildlife, and inspire people to value the amazing things healthy wetlands achieve for people and nature.

The Aust to Brean Down section of England's coastal path is located along a stretch of the Severn Estuary in between two of WWT's sites, Slimbridge to the north and Steart Marshes to the south. The Trust welcomes the addition of coastal access for visitors and residents, and hopes this will encourage people to explore the wonderful Severn estuary and its wildlife. It supports the development of signage to encourage interest in the waterbirds and wildlife using the estuary.

It welcomes the mitigation measures that have been identified in the Habitats Risk Assessment and Nature Conservation Assessment to reduce the impact on waterbirds and estuarine habitats. It has worked on similar mitigation measures elsewhere in the Severn estuary. It has concerns about relying on adoption of behavioural change outlined on signs to mitigate disturbance, as it is unrealistic to expect that everyone will read and adopt required behaviour displayed on signs.

In order to encourage adoption of behaviour displayed on signs, it suggests that further engagement of the local community may be useful in installing signs and encourage individuals to help warden the area independently.

It encourages further consideration of the need for additional physical measures, such as screens and netting, to prevent people and dogs leaving the path in highly sensitive areas. It says stock netting in areas where people frequently let dogs off leads regardless of signs has proved effective at preventing dogs accessing sensitive areas without compromising visual aesthetics. With regards to seasonal access, it believes it is important that information on when routes are open and shut is made very clear and easy to read. It says that locked gates during the closed period also aids in controlling access.

It suggests follow-up work to check if the mitigation is effective.

Natural England's comment:

We welcome the Wildlife and Wetlands Trust representation and for their support for the overall objective of a continuous route along the lower Severn estuary, the measures we propose to avoid mitigate potential disturbance of waterbirds and the use of branded signs to stimulate public interest in waterbirds.

The representation relates to all the proposals between Aust and Brean Down. Our comments below explain how we think it should be understood in that wider context and, where relevant, in relation to the specific proposals in report ABD2.

Our overall approach to disturbance and mitigation is set out in our published [Habitats Regulations Assessment](#), including the simple set of behavioural messages that we propose to promote to walkers along the estuary.

We agree that it is not realistic to expect everyone to read signs or adhere to behavioural messages and the signs we propose are backed up in some places with additional measures. In [report ABD2](#) we do not propose any mitigation measures other than new signs because the patterns of use are well established and we do not foresee any significant changes when the coast path opens – see the assessment of existing access and predicted change in section D3.2A of our HRA.

We agree that fencing can be a useful way to avoid disturbance to waterbirds and this is an option we propose to use in other parts of the estuary, in particular where new sections of path are proposed and walkers or their dogs might otherwise stray off the path into a sensitive area.

We agree with WWT that face-to-face engagement with the local community may be a useful way to help new access arrangements to bed in and we have already begun discussions with two local partner organisations who are interested in doing so.

Overall we are confident in our conclusions that the suite of mitigation measures we propose in the report will give the required level protection. We note WWT's suggestion to check that it operates as expected. There are two arrangements in place that will help with this: first, the requirement for local access authorities to report to Natural England on the condition of the path and associated infrastructure, in order to qualify for central government contribution towards maintenance costs. The second is the ongoing Wetland Birds Survey (WeBS), a national scheme by which we are able to track trends in the populations of wetland bird species using the Severn Estuary.

Length Report 3

Full representations

Representation number:	<i>MCA / ABD Stretch/ R/6/ ABD1417</i>
Organisation/ person making representation:	<i>The Ramblers (Avon Area)</i>
Route section(s) specific to this representation:	-
Other reports within stretch to which this representation also relates:	<i>ABD2 and ABD3</i>
Representation in full	
<p>The various parties involved in developing these proposals should be commended for the amount of work that has gone into reaching this stage so far and Natural England are to be commended for publishing a very comprehensive set of proposals. The report identifies various improvements to provide better access, path surfaces and protection to sensitive areas of habitat and, from a user's perspective, these proposals seem reasonable. This is a significant opportunity to improve public access to this stretch of coast, with benefits for residents, businesses and visitors. More people will have easier and more extensive access to the coastal environment for open-air recreation, which is widely acknowledged to have significant benefits for human health and well-being.</p> <p>An area of concern relates to the Severn Way flood defence improvements.</p> <p>Site: Land Off New Passage Road, And The A403 (Severn Road) South Gloucestershire Severnside</p> <p>Description: The Avonmouth Severnside Enterprise Area (ASEA) ecological mitigation and flood defence scheme includes works at three sites within South Gloucestershire, as follows:</p> <ul style="list-style-type: none"> - Area 1 Scheme (Aust to Severn Beach - Severnside) - Construction of new flood defence walls, embankments and flood gates, raising of existing flood defence walls and embankments, and improvements to the Cake Pill Outfall, Chestle Pill Outfall, and Cotteralls Pill Outfall. - Area 3A Scheme (Severn Beach Railway - North) - Construction of new flood defence walls and embankments, raising of existing flood defence walls, and improvements to the New Pill Outfall. - Area 5 Scheme (Northwick) - Creation of an ecological mitigation area comprising 41.9ha freshwater seasonally (winter months) wet grassland habitat and 14.49ha of permanent open water in the form of ponds. <p>What arrangements are in place to ensure improvements along the Severn Way are coordinated between Natural England, the Environment Agency and their Contractors?</p>	
Natural England's comments	

We welcome the representation from the Avon Area Ramblers. We thank them for the interest they have taken in the development of our coastal access proposals for the coast between Aust and Avonmouth and for their support for the final proposals, including the measures proposed to protect wildlife and supporting habitats. We ask that the Secretary of State note these views and the expected benefits from the coast path in terms of public enjoyment, physical health and well-being.

The representation raises a concern with respect to planned flood defence improvements between Aust and Avonmouth. These works will affect parts of the proposed England Coast Path route. The part it affects follows part of an existing promoted long-distance route called the Severn Way between Old Passage on map ABD1a and Chittening Industrial Estate on map ABD3a.

We agree that close working relationships will be necessary between Natural England, the Environment Agency and their contractors, to which we would add South Gloucestershire and Bristol City Councils which are also partners in both the England Coast Path and the flood defence improvement programme. This will help avoid any conflict between the flood defence works and recreational use, ensure impacts on wildlife are minimised and ensure efficient operations for both projects. All the organisations involved are aware of this requirement and an initial meeting has already been held to discuss timescales and ways of working.

With respect to the route proposed in report ABD3, there is no scope for direct effects on its physical establishment or use during the initial period of flood defence improvements scheduled to 2025. By this time, this part of the England Coast Path should be fully established and operational assuming that the Secretary of State approves a route.

Subsequently, flood defence improvements are planned between 2025 and 2035 in the vicinity of the railway where it runs adjacent to the route shown on maps ABD 3a and 3b. Natural England, Bristol City Council and the Environment Agency will convene discussions about this once the scope and nature of the works become clearer. As we understand it, it is unlikely to result in any permanent change to the position of the existing path which we now propose as the England Coast Path route. In the event that such a change were necessary we would submit a variation report to the Secretary of State after consultation with relevant interests.

The specific elements of the flood defence improvement programme listed in the representation – Area 1 (Aust to Severn Beach), Area 3A (Severn Beach railway north) and Area 5 (Northwick mitigation area) - are outside the area covered by report ABD3. We discuss these in more detail in our comments on the representations about reports ABD1 and ABD2, because these are the areas where the works will take place.

Representation number:

MCA / ABD Stretch/ R/8/ ABD1434

Organisation/ person making representation:	<i>Joint Local Access Forum (Bath and North East Somerset, Bristol City and South Gloucestershire)</i>
Route section(s) specific to this representation:	-
Other reports within stretch to which this representation also relates:	<i>ABD2 and ABD3</i>
Representation in full	
<p>This representation is made on behalf of the Joint Local Access Forum (JLAF) for Bath & North East Somerset, Bristol City and South Gloucestershire. The JLAF's statutory function is to advise public bodies on matters relating to public access and the section of the route from Aust to Avonmouth Bridge lies within the JLAF's area.</p> <p>The LAF support and acclaim the proposals for the England Coast Path. The various parties involved in developing these proposals should be commended for the amount of work that has gone into reaching this stage so far and Natural England are to be commended for publishing a very comprehensive set of proposals. The report identifies various improvements to provide better access, path surfaces and protection to sensitive areas of habitat and, from a user's perspective, these proposals seem reasonable. This is a significant opportunity to improve public access to this stretch of coast, with benefits for residents, businesses and visitors. A greater number of people will have easier and more extensive access to the coastal environment for open-air recreation, which is widely acknowledged to have significant benefits for human health and well-being.</p> <p>There is a need for the necessary arrangements to be in place to ensure that improvements along the Severn Way from Aust to Avonmouth are coordinated between Natural England, the Environment Agency and their contractors. The JLAF wish to draw particular attention to the need for co-ordination in respect of the Area 1 Scheme, the Area 3A scheme and the Area 5 Scheme which are part of the Severn Way flood defence improvements (PT18/2505/R3F).</p>	
Natural England's comments	
<p>We welcome the representation from the Joint Local Access Forum. We thank them for the interest they have taken in the development of our coastal access proposals for the coast between Aust and Avonmouth and for their support for the final proposals, including the measures proposed to protect wildlife and supporting habitats. We ask that the Secretary of State note these views and the expected benefits from the coast path in terms of public enjoyment, physical health and well-being.</p> <p>The representation raises a concern with respect to planned flood defence improvements between Aust and Avonmouth. These works will affect parts of the proposed England Coast Path route. This part of the proposed route follows part of an existing promoted</p>	

long-distance route called the Severn Way between Old Passage on map ABD1a and Chittening Industrial Estate on map ABD3a.

We agree that close working relationships will be necessary between Natural England, the Environment Agency and their contractors, to which we would add South Gloucestershire and Bristol City Councils which are also partners in both the England Coast Path and the flood defence improvement programme. This will help avoid any conflict between the flood defence works and recreational use, ensure impacts on wildlife are minimised and ensure efficient operations for both projects. All the organisations involved are aware of this requirement and an initial meeting has already been held to discuss timescales and ways of working.

With respect to the route proposed in report ABD3, there is no scope for direct effects on its physical establishment or use during the initial period of flood defence improvements scheduled to 2025. By this time, this part of the England Coast Path should be fully established and operational assuming that the Secretary of State approves a route.

Subsequently, flood defence improvements are planned between 2025 and 2035 in the vicinity of the railway where it runs adjacent to the route shown on maps ABD 3a and 3b. Natural England, Bristol City Council and the Environment Agency will convene discussions about this once the scope and nature of the works become clearer. As we understand it, it is unlikely to result in any permanent change to the position of the existing path which we now propose as the England Coast Path route. In the event that such a change were necessary we would submit a variation report to the Secretary of State after consultation with relevant interests.

The specific elements of the flood defence improvement programme listed in the representation – Area 1 (Aust to Severn Beach), Area 3A (Severn Beach railway north) and Area 5 (Northwick mitigation area) - are outside the area covered by report ABD3. We discuss them in more detail in our comments on the representations about reports ABD1 and ABD2, because these are the areas where the works will take place.

Other representations

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:
<i>MCA/ABD Stretch/R/1/ABD1840</i>	<i>[Redacted]</i>
<i>MCA/ABD Overview/R/2/ABD1842</i>	<i>[Redacted]</i>
Name of site:	<i>Aust to Brean</i>
Report map reference:	-
Route sections on or adjacent to the land:	-

Other reports within stretch to which this representation also relates	<i>All reports between Aust and Brean Down</i>
<p>Summary of point:</p> <p>[Redacted] is a resident of North Somerset and Ward Councillor for Banwell and Winscombe, a short distance from the coast at Weston-super-Mare. [Redacted] is a local resident and walker.</p> <p>Both representations express support and enthusiasm for the coastal access proposals from Aust to Brean as a whole.</p> <p>[Redacted] anticipates that the path will promote tourism, sustainable travel and a more active lifestyle. [Redacted] points out that that sustainable travel should play a major part in finding solutions to the climate crisis declared by North Somerset Council and believes that the coast path can contribute to sustainable travel because it links several coastal towns and so may be used by commuters.</p> <p>[Redacted] looks forward in particular to walking a path along Woodspring Bay, part of the coast covered in report ABD6 where there is no existing path.</p>	
<p>Natural England's comment:</p> <p>We thank [redacted] and [redacted] for their enthusiastic responses to the coastal access proposals. We draw the Secretary of State's attention to the anticipated benefits of our coastal access proposals both with respect to sustainable travel and public enjoyment.</p>	

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:
<i>MCA/ ABD3/ R/1/ ABD1843</i>	<i>The Disabled Ramblers</i>
<i>MCA/ ABD3/ R/2/ ABD1662</i>	<i>North Somerset Local Access Forum</i>
Name of site:	<i>Aust to Brean</i>
Report map reference:	<i>ABD 3a, 3b, 3c and 3d</i>
Route sections on or adjacent to the land:	-
Other reports within stretch to which this representation also relates	<i>All reports between Aust and Brean Down</i>
<p>Summary of point:</p> <p>Both the Disabled Ramblers and the North Somerset Local Access Forum request Natural England to consider more carefully the needs of mobility scooter users in the choice and installation of infrastructure such as gates along the route.</p>	

The Local Access Forum points out that a significant number of people with reduced mobility now use off-road mobility scooters and other mobility vehicles to enjoy terrain such as uneven grass and bare soil.

The Disabled Ramblers have identified places where a different choice of infrastructure will open up access to those with limited mobility to the England Coast Path. The Disabled Ramblers undertakes to submit further recommendations to Natural England separately to be considered as part of the establishment works, which Natural England has since received.

The Local Access Forum specifically mentions the steps across the pipeline at the junction of route sections ABD-3-S004 and ABD-3-S005, which it believes may never be accessible to mobility scooter users.

Natural England's comment:

We thank the Disabled Ramblers and the North Somerset Local Access Forum for their representations and in particular welcome the timely focus on adjustments for mobility scooter users.

The remarks concern the choice and design of existing and new structures along the proposed routes, should it be approved by the Secretary of State: they do not imply any modification of the proposed routes or the extent of the associated margin and the access rights within it.

We recognise that there have been recent innovations in the design of mobility scooters and that as a result mobility scooters are more versatile and in particular have much longer battery life.

Since receiving these representations, the Disabled Ramblers has sent some detailed recommendations for infrastructure along the proposed route between New Pill Gout and Avonmouth Bridge. We have shared these suggestions with Bristol Council.

Natural England and Bristol City Council share the ambition to make the coast path more accessible to mobility scooter users. This is subject to practical considerations and agreement of other affected land owners, which must be sought before any works are undertaken.

In relation to the steps over the pipeline, which is mentioned by the Local Access Forum, Bristol City Council are considering the feasibility of replacing them with a ramp to facilitate access by mobility scooter users and others for whom the steps are a barrier to onward access.

Relevant appended documents (see Section 5):

From the North Somerset Local Access Forum representation:

- General comments on accessibility for those with limited mobility 17.9.19.

Representation ID:	<i>MCA/ ABD3/ R/2/ ABD1662</i>
Organisation/ person making representation:	<i>North Somerset Local Access Forum</i>
Name of site:	<i>New Pill Gout to Avon Bridge</i>
Report map reference:	-
Route sections on or adjacent to the land:	-
Other reports within stretch to which this representation also relates	<i>All reports between Aust and Brean Down</i>
Summary of representation:	
<p>The Forum makes general remarks about access along the path for people with reduced mobility which are summarised in section 4 alongside similar points made by the Disabled Ramblers. It also makes the following two general points:</p> <ul style="list-style-type: none"> - Whilst specific restrictions on dogs are in place for certain sections of the ECP, there should be an expectation that dogs should be kept under close control at all times. - On-site signage and interpretation should only be used after very careful consideration of need and appropriateness to the location. Waymarks should only be used where the route is not abundantly clear and/or where a potential safety hazard may be encountered. <p><i>The North Somerset Local Access Forum is not the local access forum for the area in which the affected land is situated and its representation about this report has therefore been treated as one of the other representations which in accordance with the legislation are to be summarised.</i></p>	
Natural England's comment:	
<p><u>Access by people with dogs</u></p> <p>Our approach to access by people with dogs is underpinned by the coastal access legislation, the principle of the 'least restrictive option' set out in section 6.3 of the Coastal Access Scheme, and the specific interpretation of that principle at paragraphs 6.7.7 to 6.7.9 of the Scheme.</p>	

The default position on the England Coast Path is that people must keep dogs under effective control, although the precise legal requirement may be different where there are pre-existing access rights.

Access legislation defines effective control as meaning that the dog must either be:

- on a lead or:
- within sight of the person and the person remains aware of the dog's actions and has reason to be confident that the dog will return to the person reliably and promptly on the person's command.

It further requires that dogs must be on a lead at all times in the vicinity of livestock.

(See paragraph 6A of [Schedule 2 to the Countryside and Rights of Way Act 2000](#), as amended for the purposes of the coastal margin).

We think that effective control is a clearer and more easily understood expectation than the words 'close control', which are not further defined in law.

We know that many people seek opportunities to exercise their dogs off lead and there are many places at the coast where they may reasonably expect to do so. For these reasons we say that effective control is also a more appropriate general expectation than close control, provided people understand and can comply with its specific requirements.

We support the use of further local restrictions provided, in accordance with the least restrictive principle, there is a proven need and the restriction used is proportionate to that need. For example in report ABD6, we have proposed that dogs must be on leads at all times in several places in order to minimise disturbance to roosting and feeding waterbirds.

Signs

We agree with the Local Access Forum that waymarks, signs and interpretation should be used sparingly and after consideration of the need and suitability to the location.

Directional signs are necessary on this part of the coast path to signal the route and give walkers the clarity and confidence to follow the route. Bristol City Council are advising us on the design and location of signs that are appropriate to the urban environment that much of the route passes through in this report.

Representation ID:	<i>MCA / ABD Stretch/ R/9/ ABD1911</i>
Organisation/ person making representation:	<i>Wildfowl and Wetlands Trust (WWT)</i>

Name of site:	<i>Aust to Brean (whole stretch)</i>
Report map reference:	-
Route sections on or adjacent to the land:	-
Other reports within stretch to which this representation also relates	<i>All reports within stretch</i>

The Wildfowl & Wetlands Trust (WWT) is the UK's leading wetland conservation charity, with a vision of a world where healthy wetland nature thrives and enriches lives. It works across the UK and internationally to conserve, restore and create wetlands, save wetland wildlife, and inspire people to value the amazing things healthy wetlands achieve for people and nature.

The Aust to Brean Down section of England's coastal path is located along a stretch of the Severn Estuary in between two of WWT's sites, Slimbridge to the north and Steart Marshes to the south. The Trust welcomes the addition of coastal access for visitors and residents, and hopes this will encourage people to explore the wonderful Severn estuary and its wildlife. It supports the development of signage to encourage interest in the waterbirds and wildlife using the estuary.

It welcomes the mitigation measures that have been identified in the Habitats Risk Assessment and Nature Conservation Assessment to reduce the impact on waterbirds and estuarine habitats. It has worked on similar mitigation measures elsewhere in the Severn estuary. It has concerns about relying on adoption of behavioural change outlined on signs to mitigate disturbance, as it is unrealistic to expect that everyone will read and adopt required behaviour displayed on signs.

In order to encourage adoption of behaviour displayed on signs, it suggests that further engagement of the local community may be useful in installing pride and encourage individuals to help warden the area independently.

It encourages further consideration of the need for additional physical measures, such as screens and netting, to prevent people and dogs leaving the path in highly sensitive areas. It says stock netting in areas where people frequently let dogs off leads regardless of signs has proved effective at preventing dogs accessing sensitive areas without compromising visual aesthetics. With regards to seasonal access, it believes it is important that information on when routes are open and shut is made very clear and easy to read. It says that locked gates during the closed period also aids in controlling access.

It suggests follow-up work to check if the mitigation is effective.

Natural England's comment:

We thank the Wildlife and Wetlands Trust for its representation and support for the overall objective of a continuous route along the lower Severn estuary, the measures we propose to avoid mitigate potential disturbance of waterbirds and the use of branded signs to stimulate public interest in waterbirds.

The representation relates to all the proposals between Aust and Brean Down. Our comments below explain how we think it should be understood in that wider context and, where relevant, in relation to the specific proposals in report ABD3.

Our overall approach to disturbance and mitigation is set out in our published [Habitats Regulations Assessment](#) (HRA), including the simple set of behavioural messages that we propose to promote to walkers along the estuary.

We agree that it is not realistic to expect everyone to read signs or adhere to behavioural messages and the signs we propose are backed up in some places with additional measures. [In report ABD3](#) there is no significant risk of increased disturbance arising from the access proposals because the route is separated from sensitive areas by the railway (throughout) and operational areas of the port (from Chitting Industrial Estate to Avon Bridge – maps ABD 3b, 3c and 3d) – see the assessment of existing access and predicted change in section D3.2B of our HRA.

We agree that fencing (or other barriers) can help to avoid disturbance to waterbirds and this is an option we propose to use in some places, where walkers or their dogs might otherwise stray off the path into a sensitive area. There are no such places in the area covered by this report, for the reasons given in the paragraph above.

We agree with WWT that face-to-face engagement with the local community may be a useful way to help new access arrangements to bed in and we have already begun discussions with two local partner organisations who are interested in doing so.

Overall we are confident in our conclusions that the suite of mitigation measures we propose in the report will give the required level protection. We note WWT's suggestion to check that it operates as expected. There are two arrangements in place that will help with this: first, the requirement for local access authorities to report to Natural England on the condition of the path and associated infrastructure, in order to qualify for central government contribution towards maintenance costs. The second is the ongoing Wetland Birds Survey (WeBS), a national scheme by which we are able to track trends in the populations of wetland bird species using the Severn Estuary.

Length Report 4

Full representations

Representation number:	<i>MCA/ ABD Stretch/ R/5/ ABD1687</i>
Organisation/ person making representation:	<i>North Somerset Council</i>
Route section(s) specific to this representation:	-
Other reports within stretch to which this representation also relates:	<i>ABD 5, ABD6, ABD7, ABD8 and ABD 9</i>
Representation in full	
<p>North Somerset Council welcomes Natural England’s proposal to establish a path along the North Somerset Coast line between the River Axe and the River Avon. The 32-mile stretch will form part of the England Coast Path National Trail.</p> <p>The England Coastal Path National Trail will be a great resource enabling the public to walk along our coastal regions enjoying our views. This will be a benefit both to local residents and visitors of our area.</p> <p>Natural England have carried out numerous meetings with affected landowners and those with a legal interest in the land affected attempting to strike a fair balance between landowner interests and public access as well as protecting nature conservation sites.</p>	
Natural England’s comments	
<p>North Somerset Council holds management responsibility for parts of the proposed route in report ABD4 that are public rights of way. We have worked closely with North Somerset Council throughout the development of our coastal access proposals for North Somerset, from Avon Bridge (report ABD4) to Brean Cross Sluice (ABD9). Council officers provided us with technical advice on the various route options under consideration and attended meetings with affected land owners. In particular they provided advice on what infrastructure would be required along the proposed route, estimated establishment costs for the proposals, and potential impacts on archaeological assets and how to avoid them.</p> <p>We thank the Council for its advice and cooperation and ask the Secretary of State to note its views on the benefits for residents and visitors to the area.</p>	

Representation number:	<i>MCA/ ABD Stretch/ R/7/ ABD1899</i>
Organisation/ person making representation:	<i>Environment Agency</i>

Route section(s) specific to this representation:	<i>ABD-4-S026 to ABD-4-S031</i>
Other reports within stretch to which this representation also relates:	<i>ABD1, ABD2, ABD6, ABD7, ABD10</i>
Representation in full	
<p>The Environment Agency was established in 1996 to protect and improve the environment. We have an operational responsibility for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea, as well as being a coastal erosion risk management authority. Additionally, we have a statutory duty under the Water Resources Act 1991 and the Environmental Permitting Regulations (England and Wales) 2016 to assess and review any works done within 8 metres of fluvial main river and 16 metres of tidal defence.</p> <p>Whilst, we have no “in principle” objections. to the proposals subject to the comments outlined in this response, we will need to assess the acceptability of any detailed matters through the Flood Risk Activity Permit (FRAP) process detailed below.</p> <p>Flood Risk Activity Permit</p> <p>The proposals may require a permit under the Environmental Permitting (England and Wales) Regulations 2010 from the Environment Agency for any proposed works or structures, in, under, over or within sixteen metres of the top of the bank of the Severn Estuary, designated a ‘main river’. An Environmental Permit may also be required for any works on, or within sixteen metres of the landward toe of any Environment Agency designated flood defence structure(s). It is common in larger river systems, or tidal areas, for Environment Agency flood defences to be located in excess of 8 metres from the main channel or coastline, and greater than 20 metres in some instances. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt.</p> <p>A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits. To discuss the scope of the controls please contact the Environment Agency on 03708 506 506 or email: bridgwater.frap@environment-agency.gov.uk .</p> <p>To find the location of Environment Agency flood defence structure and main rivers, together with further information, please refer to our Flood Maps on gov.uk. We would like to agree the location of any signage and new gates you intend to install, which could be done through the Flood Risk Activity Permit process discussed above.</p> <p>It must be noted that any works in proximity of a watercourse other than a main river, may be subject to the regulatory requirements of the Lead Local Flood Authority/Internal Drainage Board (e.g. Lower Severn Internal Drainage Board).</p> <p>Flood Risk considerations</p>	

With regards to the specific sections of the coastal path, we offer the following comments. We ask that any detailed proposals fully address the points raised, to ensure the integrity of coastal defences is not adversely impacted by the coastal path, in the interest of flood risk management:

[At this point in the representation there are detailed comments relating to several reports within the Aust to Brean stretch. Here we include only those relating to this report. Others are set out in full in Natural England's comments on representations about the report to which they relate.]

ABD4- Avonmouth Bridge to Portishead Marina

We need further details of the arrangement at Fastings Gout near Royal Portbury Docks. There is the Commissioners Bank between Portishead and the Docks which is in a poor state of repair and could potentially be overtopped. There is also an Internal Drainage Board (IDB) structure at the Portishead end.

Fisheries, Biodiversity and Geomorphology

We note within the Aust to Brean Down Habitats Regulations "table 30 other live plans or projects", the Avonmouth Severnside Enterprise Area (ASEA) Ecology and Mitigation Flood Defence Scheme and the Environment Agency's flood defence maintenance programmes are included.

We note that assent from Natural England for the flood defence maintenance programme and Habitats Regulations Assessment (HRA) is renewed on an annual basis. We are seeking a 3 year agreement next year, so it is hoped assent will be sought on a 3 yearly basis in future (for the Bristol Avon catchment). We note we will have to assess in subsequent years how any residual effects from the programme work could interact with residual effects from the Coast Path.

Although identified as having insignificant and combinable effects, the maintenance programme is not included in Table 31 'Risk of in-combination effects' within the Aust to Brean Down HRA, it is unclear whilst this is the case?

Please note in 2019 we received assent for North Somerset maintenance work between the period 2019 - 2021, so any in combination effects between the maintenance plan and coastal path would need to be considered when assent is reapplied for in 2022.

Groundwater and Contaminated Land

We understand that the trail will predominantly utilise existing infrastructure and there is therefore little likelihood of ground disturbance during construction that may encounter contamination or pose a risk to groundwater.

Should ground disturbance be required, the applicant should make appropriate consideration of potential contamination and follow the guidance 'Land Contamination: Risk Management found at <https://www.gov.uk/government/collections/land-contamination-technical-guidance-for-managing-the-risks>.

Next steps

We ask that any further correspondence/queries regarding the Coastal Access Report, are directed to the Wessex Sustainable Places team using the contact details below. We are principal Environment Agency point of contact.

Natural England's comments

The representation relates to all the proposals between Aust and Brean Down. Our comments below explain how we think it should be understood in that wider context and, where relevant, in relation to the specific proposals in report ABD4.

Natural England has worked closely with the Environment Agency throughout the development of the coastal access proposals for Aust to Brean Down. We thank them for their cooperation and advice to date and for the detailed comments in the representation. We welcome confirmation that the Agency has no 'in principle' objections to the proposed access arrangements and look forward to continued close cooperation during the establishment phase of the coast path project, should the Secretary of State approve a route.

Flood Risk Activity Permit and flood risk considerations

We have a good understanding of the Agency's operational requirements at specific locations. Our existing Agency contacts have made us aware of the requirement to obtain a Flood Risk Activity Permit (FRAP) in relation to some works along any approved route prior to establishment. North Somerset Council, the local access authority which will undertake the necessary works, is aware of the FRAP requirement and will acquire the necessary permits before any works commence. From our discussions to date, we do not anticipate that a FRAP will be necessary in relation to the works necessary to establish the proposed route between Avon Bridge and Portishead Marina.

ABD4- Avonmouth Bridge to Portishead Marina

Sections ABD-4-S026 to ABD-4-S031 of the proposed route passes along an earth bank maintained by a local body called the seawall commissioners. The bank was formerly the main sea defence for Portbury, but a higher and more landward defence has been built, leaving the Portbury Ashlands Nature Reserve and 7.9 acres of farmland still defended by the commissioners' bank. The representation from the Environment Agency confirms our understanding that the commissioners' bank will fail at some stage in the short to medium term because it is not engineered to cope with rising sea levels and extreme weather conditions and because there is no plan to improve it for that purpose. Accordingly we propose that this part of the path should be able to 'roll back' when it is no longer viable as a walking route as a result of encroachment by the sea – see paragraphs 4.2.17 to 4.2.21 of [report ABD4](#).

Since receiving the representation we have shared at a meeting with the Environment Agency further details of our proposals for the Fastings Gout area at the east end of the

commissioners' bank and it is satisfied that its interests are not affected. This is because the route does not cross the culvert which the Agency maintains.

Fisheries, Biodiversity and Geomorphology

In respect of our published Habitats Regulations Assessment (HRA), we have clarified since receiving this representation that the Environment Agency's flood maintenance programme is listed among the considerations on row 2, page 142 in table 31 of [the HRA](#). The Environment Agency have confirmed to us that they agree this to be the case. We thank the Agency for clarifying its intention to consider any in combination effects between the maintenance programme and the coast path as part of its application to Natural England for assent in 2022.

Groundwater and Contaminated Land

We note the need to consider land contamination risk with respect to any ground disturbance necessary to establish the route. We thank the Agency for supplying the link to the current guidance, which we will pass on to the local access authority coordinating path establishment.

Next steps

We note the requirement to direct any future queries through the Wessex Sustainable Places team and confirm to the Secretary of State that this new point of contact is now established.

Representation number:	<i>MCA/ ABD4/ R/5/ ABD1662</i>
Organisation/ person making representation:	<i>North Somerset Local Access Forum</i>
Route section(s) specific to this representation:	<i>All route sections, in particular ABD-4-S026</i>
Other reports within stretch to which this representation also relates:	<i>All within the Aust to Brean Down stretch</i>
Representation in full	
<p>General Points:</p> <ul style="list-style-type: none"> - Whilst specific restrictions on dogs are in place for certain sections of the ECP, there should be an expectation that dogs should be kept under close control at all times - On-site signage and interpretation should only be used after very careful consideration of need and appropriateness to the location. Waymarks should only be used where the route is not abundantly clear and/or where a potential safety hazard may be encountered <p>Point 4.2.9. There may be times when it is too wet and muddy along the stretches between Sheepway Lane and Portbury Wharf (Map ABD 4d), and at Portbury Wharf (Maps ABD 4d & 4e);</p>	

but for much of the year the natural coastal terrain here is accessible for off-road mobility scooters

Point 4.2.10

- ABD-4-S026: The proposed footbridge at Portbury Wharf (Map ABD 4d) crosses a drain where the land on either side is of the same height. This should be designed to carry an off-road mobility scooter including ramps rather than steps at either end. The many field gates proposed on map ABD 4d may well need to be checked so that they are accessible by mobility scooter riders
- There are existing bollards on map ABD 4b that are likely to block access to off-road mobility scooters, as is the cycle chicane on map 4c

Natural England's comments

We welcome the representation from the North Somerset Local Access Forum and thank them for the interest they have taken in the development of our coastal access proposals for North Somerset.

The representation makes remarks about access by people with dogs, signs and access for mobility scooter users which we address in that order in our comments below.

Access by people with dogs

Our approach to access by people with dogs is underpinned by the coastal access legislation, the principle of the 'least restrictive option' set out in section 6.3 of the [Coastal Access Scheme](#), and the specific interpretation of that principle at paragraphs 6.7.7 to 6.7.9 of the Scheme.

The default position on the England Coast Path is that people must keep dogs under effective control, although the precise legal requirement may be different where there are pre-existing access rights.

Access legislation defines effective control as meaning that the dog must either be:

- on a lead or:
- within sight of the person and the person remains aware of the dog's actions and has reason to be confident that the dog will return to the person reliably and promptly on the person's command.

It further requires that dogs must be on a lead at all times in the vicinity of livestock.

(See paragraph 6A of [Schedule 2 to the Countryside and Rights of Way Act 2000](#), as amended for the purposes of the coastal margin).

We think that effective control is a clearer and more easily understood expectation than the words 'close control', which are not further defined in law.

We know that many people seek opportunities to exercise their dogs off lead and there are many places at the coast where they may reasonably expect to do so. For these reasons we say that effective control is also a more appropriate general expectation than close control, provided people understand and can comply with its specific requirements.

We support the use of further local restrictions provided that, in accordance with the least restrictive principle, there is a proven need and the restriction used is proportionate to that need. For example in report ABD6, we have proposed that dogs must be on leads at all times in several places in order to minimise disturbance to roosting and feeding waterbirds that are present at most times of year.

Signs

We agree with the Local Access Forum that waymarks, signs and interpretation should be used sparingly and after consideration of the need and suitability to the location. Specific signs and interpretation are in our view necessary and appropriate on this part of the coast path, in particular to alert walkers to the nearby presence of sensitive waterbirds and ask them to adopt certain behaviours in order to reduce the likelihood of disturbance. Small waymark discs are in our view a helpful and unintrusive means to signal the route and give walkers the clarity and confidence to follow it.

Access for mobility scooter users

We welcome the Forum's advice on adjustments for mobility scooter users and we agree that the terrain over which the route passes is generally suitable for this user group.

The suggestions concern the choice and design of existing and new structures along the proposed routes, should it be approved by the Secretary of State: they do not imply any modification of the proposed routes or the extent of the associated margin and the access rights within it.

Natural England and North Somerset Council share the ambition to make the coast path more accessible to mobility scooter users and in principle support suggestions made to achieve this. This is subject to practical considerations which may be raised by other interests in the land and the agreement of other affected land owners, which must be sought before any works are undertaken. We would fund the physical works necessary as part of the preparatory works for the route approved by the Secretary of State.

We draw the Secretary of State's attention to the representations summarised in section 4 below from the Disabled Ramblers which make some similar points, and to our comments there.

Relevant appended documents (see section 5):

General Comments on Accessibility for those with Limited Mobility 17.9.19

Other representations

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:
MCA/ABD Stretch/R/1/ABD1840	[Redacted]
MCA/ABD Overview/R/2/ABD1842	[Redacted]
Name of site:	<i>Aust to Brean</i>
Report map reference:	-
Route sections on or adjacent to the land:	-
Other reports within stretch to which this representation also relates:	<i>All reports between Aust and Brean Down</i>
<p>Summary of point:</p> <p>[Redacted] is a resident of North Somerset and Ward Councillor for Banwell and Winscombe, a short distance from the coast at Weston-super-Mare. [Redacted] is a local resident and walker. Both express support and enthusiasm for the coastal access proposals from Aust to Brean as a whole.</p> <p>[Redacted] anticipates that the path will promote tourism, sustainable travel and a more active lifestyle. [Redacted] points out that that sustainable travel should play a major part in finding solutions to the climate crisis declared by North Somerset Council and believes that the coast path can contribute to sustainable travel because it links several coastal towns and so may be used by commuters.</p> <p>[Redacted] looks forward in particular to walking a path along Woodspring Bay, part of the coast covered in report ABD6 where there is no existing path.</p>	
<p>Natural England's comment:</p> <p>We thank [Redacted] and [Redacted] for their enthusiastic responses to the coastal access proposals. We draw the Secretary of State's attention to the anticipated benefits of our coastal access proposals both with respect to sustainable travel and public enjoyment.</p>	

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:
MCA/ ABD4/ R/1/ ABD1843	<i>Disabled Ramblers</i>

<i>MCA/ ABD4/ R/2/ ABD1843</i>	<i>Disabled Ramblers</i>
<i>MCA/ ABD4/ R/3/ ABD1843</i>	<i>Disabled Ramblers</i>
Name of site:	<i>Avon Bridge to Portishead Marina</i>
Report map reference:	<i>ABD 4a to ABD 4e</i>
Route sections on or adjacent to the land:	<i>All sections, in particular ABD-4-S026</i>
Other reports within stretch to which this representation also relates	-
<p>Summary of point:</p> <p>The three representations from the Disabled Ramblers concern access for people that use mobility scooters and other mobility vehicles. They make the following general remarks:</p> <ul style="list-style-type: none"> - Natural England, in the Accessibility statement 4.2.9 in report ABD4, has not recognised that there is a significant and steadily increasing number of people with reduced mobility who use off-road mobility scooters and other mobility vehicles to enjoy routes on more rugged terrain including uneven grass, bare soil paths and a degree of mud. - The terrain along the whole stretch of the route proposed in Report ABD 4 is suitable for this group of people. - Natural England should take all reasonable steps needed to make the trail as easy as possible for disabled people and those with reduced mobility, and be mindful of British Standard BS5709: 2018 Gaps, Gates and Stiles. - Natural England should reconsider the suitability of existing infrastructure that it has indicated should be retained because in many cases this bars legitimate access of this group of people. There are places in report ABD4 where a different choice of infrastructure will open up access to those with limited mobility to the England Coast Path. <p>The Disabled Ramblers points out that the new footbridge with steps proposed at route section ABD-4-S026 to cross a ditch would be a barrier to mobility scooters and suggests ramps instead of steps.</p> <p>The Disabled Ramblers undertakes to submit further recommendations to Natural England separately to be considered as part of the Establishment Works, which Natural England has since received.</p>	
<p>Natural England's comment:</p> <p>We thank the Disabled Ramblers for its representation and in particular welcome the timely focus on adjustments for mobility scooter users. We draw the Secretary of State's attention to the representation from North Somerset Local Access Forum above which makes some similar points, and to our comments there.</p>	

We recognise that there have been recent innovations in the design of mobility scooters and that as a result mobility scooters are more versatile and in particular have much longer battery life.

We note that in finalising the schedule and specification of establishment works for any route approved by the Secretary of State, both Natural England and North Somerset Council (the local access authority which will undertake the works) should take all reasonable steps needed to make the trail as easy as possible for disabled people and those with reduced mobility, having regard to British Standard BS5709: 2018 Gaps Gates and Stiles.

Since receiving this representation, we have received further and more detailed suggestions from the Disabled Ramblers as to how best to fulfil this aspiration. We have shared all these suggestions with North Somerset Council.

Natural England and North Somerset Council share the ambition to make the coast path and adjoining margin more accessible to mobility scooter users and in principle agree to the suggestion to replace the steps at route section ABD-4-S026 with a ramp. This is subject to practical considerations which may be raised, for example by the affected land owner and tenant, whose agreement must be sought before any works are undertaken. We would fund the physical works necessary as part of the preparatory works for the route approved by the Secretary of State.

Relevant appended documents (see Section 5):

From the Disabled Ramblers representation *MCA/ ABD4/ R/1/ ABD1843*:

- Photographs illustrating use of mobility vehicles on uneven and wet terrain.

Representation ID:	<i>MCA/ ABD4/ R/4/ ABD1827</i>
Organisation/ person making representation:	<i>[Redacted]</i>
Name of site:	<i>Portbury Wharf</i>
Report map reference:	<i>ABD 4d and ABD 4e</i>
Route sections on or adjacent to the land:	<i>ABD-4-S026 to ABD-4-S031</i>
Other reports within stretch to which this representation also relates	-
Summary of representation:	
[Redacted] owns 7.9 acres of land protected by the sea wall, an earth bank between Sheepway Lane and Portishead Marina. [Redacted] remembers the seawall from the late 1960s and grazed livestock on the wall until the 1990s. The proposed route runs along the	

crest of the seawall at route sections ABD-4-S026 to ABD-4-S031. [Redacted] is in favour of the coast path but believes it is necessary to protect the top of the seawall from the erosion that walkers cause there.

[Redacted] says the wall was not until recently used for recreation and is now used extensively by walkers and cyclists. [Redacted] describes current recreational use of the western end of the sea wall (route sections ABD-4-S029 to ABD-4-S030) as illegal and says it has caused erosion. Now [redacted] expects that the eastern end will suffer from similar erosion caused by people following the coast path.

To remedy the erosion [redacted] suggests that protection should be given to the seawall by those who wish to use it, which we take to mean funded by Natural England as the delivery body for the coast path. [Redacted] believes that netting or gravel would maintain the current height of the bank and refers to a trial [redacted] has conducted which shows that netting could work.

[Redacted] refers to the Natural England proposal for the location of the coastal route to be adjusted when the seawall route is no longer viable as a result of erosion or sea level rise. [Redacted] warns that any new route would have to be designed very carefully to ensure it is in a safe position when the seawall overtops. [Redacted] refers to losing grazing animals when this happened in the past.

Natural England's comment:

We thank [redacted] for [their] representation and for passing on [their] advice about the seawall. The seawall is several centuries old and known as the commissioners' wall. A body known as the seawall commissioners has a statutory duty to maintain it under the Portbury Wharf Seawall Acts of 1798 and 1809. The commissioners arrange for the vegetation on the wall to be cut annually. A short (about 100m) length at the western end of the wall is owned by Persimmon Homes who do not object to the proposal. It is not known who owns the rest of the wall.

We do not agree that it is necessary or advisable to install netting or gravel along the crest of the commissioners' wall where people walk. There are two reasons for this:

- we are not convinced that the additional recreation use resulting from its inclusion in the coast path would cause significant erosion; and, importantly,
- the commissioners' wall is at risk of failure due to sea level rise and extreme weather events.

We explain these two points further below.

The western end of the seawall (route sections ABD-4-S029 to ABD-4-S031 on map ABD 4d), which is claimed as a right of way, is a popular local walking route and forms part of a circular walk. The eastern end (route sections ABD-4-S027 and ABD-4-S028), which is a public footpath, is less popular because it does not form part of a recognised circular walk; it leads to Sheepway and Portbury village towards the bottom of map ABD 4c.

We would agree that the vegetation along the crest of the western end of the seawall has been worn by recreational use. The wear along the eastern end is less, corresponding to the lower use. We have seen no convincing evidence that this wear has lowered the overall height of the bank – rather the earth has been compacted by footfall in places where the vegetation has worn away. Should the Secretary of State approve this part of the route, we expect its designation to attract some additional use from day walkers and long-distance walkers. It seems unlikely that the additional use would be sufficient to cause a significant increase in the existing wear on the crest of the bank.

A new sea defence was built in recent times to the rear of the commissioners' wall because the existing structure was not considered adequate to protect residential and business developments from flood and sea level rise. The commissioners' wall now protects a much smaller area of low lying land bounded by the two walls and the higher ground towards the port. This consists of the Portbury (Ashlands) Nature Reserve and 7.9 acres of [redacted] land.

The commissioners' wall is vulnerable to progressive sea level rise and an increased frequency of extreme tides caused by climate change. There is no plan to manage these risks and as such it seems inevitable that the wall will fail in the short to medium term. For this reason in particular we consider it prudent to limit investment in physical infrastructure, including surfacing, on this part of the coast path.

Instead we propose that the route should roll back when the commissioners' wall is no longer a viable walking route. We agree with [redacted] that this should be done carefully. As with any adjustment of this type, we would consult with affected land owners before choosing the new route and, in this instance, the Environment Agency. Geospatial flood risk modelling tools are available to plot a safe and suitable fall back route when this is necessary.

Representation ID:	<i>MCA/ABD4/R/6/ABD1457</i>
Organisation/ person making representation:	<i>The Bristol Port Company</i>
Name of site:	<i>Avonmouth Bridge to Portishead Marina</i>
Report map reference:	<i>ABD 4b, 4c and 4d</i>
Route sections on or adjacent to the land:	-

Other reports within stretch to which this representation also relates

-

Summary of representation:

The Bristol Port Company appreciates Natural England's consultation during the preparation and development of their access plans and particularly their consideration of various alternative routes to try to address concerns regarding security and potential disturbance of wildlife.

The final proposals do not reflect the Port's preferred choice for the path given its existing and future operational requirements, but it has sought to accommodate the initial proposals. It is inevitable that changes will be needed to the route in order to avoid prejudice to the Port's statutory undertaking and the safe and secure operation of the Port in the future.

The Port welcomes Natural England's acknowledgement of this need to adapt the existing route or identify replacement routes in light of the Port's future needs in Section 7 of the Overview Report. It considers that specific reference to this need should also be made in the "other future change" section in report ABD4.

The Port regards the following as errors on Directions Map ABD 4A and other maps in the reports and supporting documents and asks for them to be amended:

1. The bridleway (LA15/21) in Royal Portbury Dock adjacent to the Sheepway, because it was stopped up in 2002 and removed from the definitive map.
2. The two areas of registered common land shown as existing access land should not be shown as existing access land, because:
 - They are excepted from access rights conferred by the Countryside and Rights of Way Act 2000 (CROW) because they are land covered by buildings and other works used for the purposes of the Port's statutory undertaking; and
 - They are not 'urban commons' with the meaning of section 193 of the Law of Property Act and therefore are not subject to access rights apart from CROW. Natural England had previously agreed to remove the commons from their "access land" databases (6 March 2018).
3. Map ABD 4b should show two sets of bollards along the section of the trail between Avonmouth Bridge and Royal Portbury Dock Road; one set is in the middle of route section ABD-4-S006 and one is at the beginning of ABD-4-S004 adjacent to the tunnel under the Avonmouth Bridge.

Map ABD 4c should show bollards along the trail between Royal Portbury Dock Road and the Sheepway at the following locations:

- the beginning of route section ABD-4-S010, near Royal Portbury Dock Road,

- approximately two-thirds of the way along route section ABD-4-S010,
 - the beginning of route section ABD-4-S011, just up the incline from the Drove, and
 - the junction of route sections ABD-4-S011 where it meets S012.
4. The Port is surprised to see that the coastal margin has been expanded to include small areas landward of the trail through the Port's conservation area in Vole City (as indicated by the purple shaded adjacent area along route section ABD-4-S019 on map ABD 4d). The trail here should be located immediately adjacent to the hedge and as such there is unlikely to be additional coastal margin.

The Port comments that the position of the new fencing and gates along route sections ABD-4-S019 to ABD-4-S021 shown on map ABD 4d appears to reflect its discussions with Natural England during consultation over the proposed route. They request an opportunity to agree in more detail the layout of fencing and gates here prior to construction and establishment of the trail. They emphasise that the layout must provide access for existing farming/conservation activities and the future maintenance of the trail itself.

Natural England's comment:

We thank the port for the detailed remarks in the representation and for its cooperation during the development of the access proposals.

We accept that adjustments to the route may be needed later in order to accommodate any approved plans for the Port's expansion and we envisage using the variation report procedure to make such adjustments as may be necessary. The Port has in turn indicated that it will endeavour to accommodate an alternative route for the coast path where necessary in its future plans and we thank them for that. This is as we envisage in part 7 of the Overview to the reports. We omitted to refer to these future possibilities in paragraph 4.2.22 of the report under the subheading 'other future change' and ask the Secretary of State to note this omission.

Below we respond to each of the more detailed remarks in the representation.

1. We agree that the public bridleway (LA15/21) in Royal Portbury Dock adjacent to the Sheepway which appears on Directions Map 4A has been stopped up.
2. We agree that the two areas of registered common land which appear on Directions Map 4A are not urban commons and so not subject to access rights that existed prior to the implementation of part I of the Countryside and Rights of Way Act 2000 (CROW). We confirm that we have removed these two commons from our dataset of urban commons, as we agreed to do in March 2018 at a meeting with the Port.

We would agree that the two registered commons include operational land that is excepted from CROW rights. However, we say that both commons include land which is not operational and would therefore be subject to CROW access rights. Ordnance Survey does not generally distinguish on its maps excepted land from land that is subject to CROW access rights and that is the reason the whole common in both cases is shown in the yellow outline in Directions Map 4A, denoting access land. We refer the Secretary of State to map B2 in our Habitats Regulations Assessment where we distinguish the common land that we believe to be subject to CROW access rights (in yellow wash) from what we understand to be operational land (yellow outline only). Should the Secretary of State wish, we would be able to reissue report ABD4 as an erratum, with the two commons shown depicted in this way on Directions Map 4A.

3. We accept that there are some existing bollards not shown on maps ABD 4b and 4c. We have no intention to remove or replace these bollards as part of the coast path establishment works, provided that they are set to allow mobility scooters to pass through them as we believe to be the case. As such we suggest it is not necessary to amend the maps to show them, but we thank the Port Company for the time it has taken to make us aware of the omissions.
4. The landward coastal margin shown on map ABD 4d adjoining route section ABD-4-S019 is the land between the route as walked and recorded with a port representative and the hedge which is the nearest physical feature to that route. We confirm that the route is immediately adjacent to the hedge. As we understand it, the Port Company agrees with the landward boundary proposed (the hedge), but expresses surprise that the coastal margin landward of the trail is wide enough to appear on the map – suggesting perhaps that the route should be closer to the hedge than shown.

In practice the width of the path corridor (including landward margin) at section ABD-4-S019 will be determined by the exact position of the new fence shown on the map alongside the route, which we have agreed to fund at the Port's request. We have already agreed with the port that this should be no further from the hedge than necessary to accommodate the tractor that will mow the grass along the route and cut the hedge.

We agree that it will be necessary to meet the Port on site with the local access authority to finalise the position of this fence and other fences and gates in this area. This being the case, we suggest that there is no need to amend the proposals to address the Port's remarks. Should the Secretary of State so determine, we would be able to reissue report ABD4 as an erratum, depicting route section ABD-4-S019 and the new fence adjoining the route closer to the hedge, so that no additional landward coastal margin is visible on the map.

Representation ID:	<i>MCA / ABD Stretch/ R/9/ ABD1911</i>
Organisation/ person making representation:	<i>Wildfowl and Wetlands Trust (WWT)</i>
Name of site:	<i>Aust to Brean (whole stretch)</i>
Report map reference:	-
Route sections on or adjacent to the land:	-
Other reports within stretch to which this representation also relates	<i>All reports within stretch</i>

The Wildfowl & Wetlands Trust (WWT) is the UK's leading wetland conservation charity, with a vision of a world where healthy wetland nature thrives and enriches lives. We work across the UK and internationally to conserve, restore and create wetlands, save wetland wildlife, and inspire everyone to value the amazing things healthy wetlands achieve for people and nature.

The Aust to Brean Down section of England's coastal path is located along a stretch of the Severn Estuary in between two of WWT's sites, Slimbridge to the north and Steart Marshes to the south. We welcome the addition of coastal access for visitors and residents, and hope this will encourage people to explore the wonderful Severn estuary and its wildlife. We support the development of signage to encourage interest in the waterbirds and wildlife using the estuary.

With regard to the potential disturbance of waterbirds from the construction and use of the path, we welcome the mitigation measures that have been identified in the Habitats Risk Assessment and Nature Conservation Assessment to reduce the impact on waterbirds and estuarine habitats. WWT has worked on similar mitigation measures elsewhere in the Severn estuary. From our experience we have concerns regarding relying on adoption of behavioural change outlined on signs to mitigate disturbance, as it is unrealistic to expect that everyone will read and adopt required behaviour displayed on signs.

In order to encourage adoption of behaviour displayed on signs, further engagement of the local community to raise awareness of the sensitivity and value of the estuary may be useful in installing signs and encourage individuals to help warden the area independently.

We would encourage further consideration of the need for additional physical measures, such as screens and netting, to prevent people and dogs leaving the path in highly sensitive areas. Installing stock netting in areas where people frequently let dogs off leads regardless of signs has proved effective at preventing dogs accessing sensitive areas without compromising visual aesthetics. With regards to seasonal access, it will be important that

information on when routes are open and shut is made very clear, with easy to read colour coded signage to indicate timings. Management with locked gates during the closed period also aids in controlling access.

Ideally, we would like to see some follow-up work to identify whether the mitigation methods are effective in reducing disturbance to waterbirds – i.e. to determine if signage and path boundaries are effective in persuading walkers to keep dogs close-by etc.

Natural England's comment:

We thank the Wildlife and Wetlands Trust for its representation and support for the overall objective of a continuous route along the lower Severn estuary, the measures we propose to avoid mitigate potential disturbance of waterbirds and the use of branded signs to stimulate public interest in waterbirds.

The representation relates to all the proposals between Aust and Brean Down. Our comments below explain how we think it should be understood in that wider context and, where relevant, in relation to the specific proposals in report ABD4.

Our overall approach to disturbance and mitigation is set out in our published [Habitats Regulations Assessment](#) (HRA), including the simple set of behavioural messages that we propose to promote to walkers along the estuary.

We agree that it is not realistic to expect everyone to read signs or adhere to behavioural messages and the signs we propose are backed up in some places with additional measures. [In report ABD4](#) patterns of use are well established but we foresee some changes when the coast path opens – see the assessment of existing access and predicted change in section D3.2B of our HRA. Accordingly we propose some additional physical measures to reduce existing disturbance at the east end of Portbury Wharf, as set out on pages 2 and 3 of the report.

We agree that fencing (or other barriers) can help to avoid disturbance to waterbirds and this is an option we propose to use in some places, where walkers or their dogs might otherwise stray off the path into a sensitive area. For example on page 3 of the report, we propose to move the existing route section ABD-4-S026 further from Chapel Pill and install guide fencing alongside it to discourage people from approaching the creek more closely because waterbirds are known to feed and roost there.

We agree with WWT that face-to-face engagement with the local community may be a useful way to help new access arrangements to bed in and we have already begun discussions with two local partner organisations who are interested in doing so.

Overall we are confident in our conclusions that the suite of mitigation measures we propose in the report will give the required level protection. We note WWT's suggestion to check that it operates as expected. There are two arrangements in place that will help with this: first, the requirement for local access authorities to report to Natural England on the condition of the path and associated infrastructure, in order to qualify for central government contribution towards maintenance costs. The second is the ongoing Wetland

Birds Survey (WeBS), a national scheme by which we are able to track trends in the populations of wetland bird species using the Severn Estuary.

Length Report 5

Full representations

Representation number:	<i>MCA/ ABD Stretch/ R/5/ ABD1687</i>
Organisation/ person making representation:	<i>North Somerset Council</i>
Route section(s) specific to this representation:	-
Other reports within stretch to which this representation also relates:	<i>ABD 4, ABD6, ABD7, ABD8 and ABD 9</i>
Representation in full	
<p>North Somerset Council welcomes Natural England’s proposal to establish a path along the North Somerset Coast line between the River Axe and the River Avon. The 32-mile stretch will form part of the England Coast Path National Trail.</p> <p>The England Coastal Path National Trail will be a great resource enabling the public to walk along our coastal regions enjoying our views. This will be a benefit both to local residents and visitors of our area.</p> <p>Natural England have carried out numerous meetings with affected landowners and those with a legal interest in the land affected attempting to strike a fair balance between landowner interests and public access as well as protecting nature conservation sites.</p> <p><i>[North Somerset Council notes that it currently has management responsibility for part of the land in report ABD5 over which the England Coastal Path National Trail will run.]</i></p>	
Natural England’s comments	
<p>North Somerset Council currently holds management responsibility for most of the proposed route in report ABD5, being public rights of way and other land in public ownership or management.</p> <p>We have worked closely with North Somerset Council throughout the development of our coastal access proposals for North Somerset, from Avon Bridge (report ABD4) to Brean Cross Sluice (ABD9). Council officers provided us with technical advice on the various route options under consideration and attended meetings with affected land owners. In particular they provided advice on what infrastructure would be required along the proposed route, estimated establishment costs for the proposals, and potential impacts on archaeological assets and how to avoid them.</p> <p>We thank the Council for its advice and cooperation and ask the Secretary of State to note its views on the benefits for residents and visitors to the area.</p>	

Representation number:	<i>MCA/ ABD5 / R/4/ ABD1645</i>
Organisation/ person making representation:	<i>North Somerset Council</i>
Route section(s) specific to this representation:	<i>ABD-5-S074</i>
Other reports within stretch to which this representation also relates:	-
Representation in full	
<p>This section of land has an area of Schedule Ancient Monument, and also has pockets of species rich grassland. As such we would like to ask for this to be removed and the edge of the existing tarmac footpath to be the edge of the landward boundary to protect these areas of significance.</p> <p>If this cannot be excluded then we would ask for some exclusions to public access to this site. The link to the SAM details can be found:</p> <p>https://historicengland.org.uk/listing/the-list/list-entry/1007908</p>	
Natural England's comments	
<p>This representation refers to land on the landward side of route section ABD-5-S074. Our proposal is to include the land within the coastal margin to the extent shown on map ABD 5g. In accordance with section 4.8.17 of the Coastal Access Scheme we consulted the North Somerset Council before making this proposal, because it is the land owner, and this proposal was made with its agreement.</p> <p>Having received this representation we asked the Council to confirm its view on whether the land should form part of the coastal margin. It has advised that, on reflection, it should be included. We therefore recommend to the Secretary of State that the relevant proposal is approved.</p>	

Representation number:	<i>MCA/ ABD5/ R/6/ ABD1662</i>
Organisation/ person making representation:	<i>North Somerset Local Access Forum</i>
Route section(s) specific to this representation:	<i>All route sections, in particular ABD-5-S008 to ADB-5-S010, ABD-5-S014 to ABD-5-S023, ABD-5-S040 to ABD-5-S044, ABD-5-S061 to ABD-5-S062, and ABD-5-S072 to ABD-5-S074</i>
Other reports within stretch to which this representation also relates:	<i>All within the Aust to Brean Down stretch</i>
Representation in full	

General Points:

- Whilst specific restrictions on dogs are in place for certain sections of the ECP, there should be an expectation that dogs should be kept under close control at all times
- On-site signage and interpretation should only be used after very careful consideration of need and appropriateness to the location. Waymarks should only be used where the route is not abundantly clear and/or where a potential safety hazard may be encountered

Point 5.2.7: The terrain on parts of the footpath on the stretch between Nore Road Greenspace and Hangstone is suitable for off-road mobility scooters. The existing boardwalks and footbridges within these stretches need to be checked for suitability for use by those on off-road mobility scooters, and be changed if appropriate

Point 5.2.8: Mobility scooters (both pavement and off-road types) can access the terrain at sections ABD-5-S009 and ADB-5-S010 but are unable to do so at present. Because of steps at ABD-5-S008 scooters will have had to divert around this latter stretch onto the pavement of Woodlands Road. The gap in the hedge beside the field gate that leads onto ABD-5-S009 and ADB-5-S010 from the east is too narrow. This gap is positioned very close to the proposed Coast Path. It could be incorporated into the route and widened accordingly

Approaching Nore Road Greenspace from the Esplanade (ABD-5-S014 to ABD-5-S016) is suitable terrain for pavement scooters. Dropped kerbs should be installed here.

Natural England's comments

We welcome the representation from the North Somerset Local Access Forum and thank them for the interest they have taken in the development of our coastal access proposals for North Somerset.

The representation makes remarks about access by people with dogs, signs and access for mobility scooter users which we address in that order in our comments below.

Access by people with dogs

Our approach to access by people with dogs is underpinned by the coastal access legislation, the principle of the 'least restrictive option' set out in section 6.3 of the [Coastal Access Scheme](#), and the specific interpretation of that principle at paragraphs 6.7.7 to 6.7.9 of the Scheme.

The default position on the England Coast Path is that people must keep dogs under effective control, although the precise legal requirement may be different where there are pre-existing access rights.

Access legislation defines effective control as meaning that the dog must either be:

- on a lead or:

- within sight of the person and the person remains aware of the dog's actions and has reason to be confident that the dog will return to the person reliably and promptly on the person's command.

It further requires that dogs must be on a lead at all times in the vicinity of livestock.

(See paragraph 6A of [Schedule 2 to the Countryside and Rights of Way Act 2000](#), as amended for the purposes of the coastal margin).

We think that effective control is a clearer and more easily understood expectation than the words 'close control', which are not further defined in law.

We know that many people seek opportunities to exercise their dogs off lead and there are many places at the coast where they may reasonably expect to do so. For these reasons we say that effective control is also a more appropriate general expectation than close control, provided people understand and can comply with its specific requirements.

We support the use of further local restrictions provided that, in accordance with the least restrictive principle, there is a proven need and the restriction used is proportionate to that need. For example in report ABD6, we have proposed that dogs must be on leads at all times in several places in order to minimise disturbance to roosting and feeding waterbirds that are present at most times of year.

Signs

We agree with the Local Access Forum that waymarks, signs and interpretation should be used sparingly and after consideration of the need and suitability to the location. North Somerset Council are advising us on the location and design of signs on this part of the coast. We intend to use finger posts at main access points and small waymark discs between access points, which are in our view a helpful and unobtrusive means to signal the route and give walkers the clarity and confidence to follow it.

Access for mobility scooter users

We welcome the Forum's advice on adjustments for mobility scooter users and we agree that some of the terrain over which the route passes is suitable for this user group.

The suggestions concern the choice and design of existing and new structures along the proposed routes to accommodate use by people with mobility scooters, should it be approved by the Secretary of State. They do not imply any modification of the proposed routes or the extent of the associated margin and the access rights within it.

Natural England and North Somerset Council share the ambition to make the coast path more accessible to mobility scooter users and in principle support suggestions made to achieve this. This is subject to practical considerations which may be raised by other interests in the land and the agreement of other affected land owners, which must be sought before any works are undertaken. We would fund the physical works necessary as part of the preparatory works for the route approved by the Secretary of State.

We refer the Secretary of State to the representations summarised in section 4 below from the Disabled Ramblers which make some similar points, and to our comments there.

Relevant appended documents (see section 5):

General Comments on Accessibility for those with Limited Mobility 17.9.19

Other representations

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:
<i>MCA/ABD Stretch/R/1/ABD1840</i>	<i>[Redacted]</i>
<i>MCA/ABD Overview/R/2/ABD1842</i>	<i>[Redacted]</i>
Name of site:	<i>Aust to Brean</i>
Report map reference:	-
Route sections on or adjacent to the land:	-
Other reports within stretch to which this representation also relates	<i>All reports between Aust and Brean Down</i>
Summary of point:	
<p>[Redacted] is a resident of North Somerset and Ward Councillor for Banwell and Winscombe, a short distance from the coast at Weston-super-Mare. [Redacted] is a local resident and walker. Both express support and enthusiasm for the coastal access proposals from Aust to Brean as a whole.</p> <p>[Redacted] anticipates that the path will promote tourism, sustainable travel and a more active lifestyle. [Redacted] points out that that sustainable travel should play a major part in finding solutions to the climate crisis declared by North Somerset Council and believes that the coast path can contribute to sustainable travel because it links several coastal towns and so may be used by commuters.</p> <p>[Redacted] looks forward in particular to walking a path along Woodspring Bay, part of the coast covered in report ABD6 where there is no existing path.</p>	
Natural England's comment:	

We thank [redacted] and [redacted] for their enthusiastic responses to the coastal access proposals. We ask the Secretary of State to note the anticipated benefits of our coastal access proposals both with respect to sustainable travel and public enjoyment.

Representations containing similar or identical points

Representation ID	Organisation/ person making representation:
<i>MCA/ ABD5/ R/2/ ABD1843</i>	<i>The Disabled Ramblers</i>
<i>MCA/ ABD5/ R/3/ ABD1843</i>	<i>The Disabled Ramblers</i>
Name of site:	<i>Portishead Marina to Wains Hill Clevedon, in particular the cliff top at Battery Point</i>
Report map reference:	<i>ABD 4a to ABD 4e, in particular ABD 4a</i>
Route sections on or adjacent to the land:	<i>ABD-5-S007, ABD-5-S009 and ABD-5-S010, ABD-4-S013 to ABD-5-S023, ABD-5-S040 to ABD-5-S044, ABD-5-S061 to ABD-5-S062, and ABD-5-S072 to ABD-5-S074</i>
Other reports within stretch to which this representation also relates	-

Summary of point:

The two representations from the Disabled Ramblers concern access for people that use mobility scooters and other mobility vehicles.

The first representation makes the following general remarks:

- Natural England, in the Accessibility statement 5.2.7 in Report ABD 5, has not recognised that there is a significant and steadily increasing number of people with reduced mobility who use off-road mobility scooters and other mobility vehicles to enjoy routes on more rugged terrain including uneven grass and bare soil paths. (The representation includes two photographs to illustrate this point which are include in section 5 of this document.)
- The terrain in the route sections listed above is suitable for this group of people.
- Natural England should take all reasonable steps needed to make the trail as easy as possible for disabled people and those with reduced mobility, and be mindful of British Standard BS5709: 2018 Gaps Gates and Stiles.
- Natural England should reconsider the suitability of existing infrastructure that it has indicated should be retained because in many cases this bars legitimate access of this group of people. There are places where a different choice of infrastructure will open up access to those with limited mobility to the England Coast Path.

The second representation includes specific advice concerning access to the grass area crossed by route sections ABD-5-S009 and ABD-5-S010 on map ABD 5a. The terrain there is suitable for mobility scooters and other mobility vehicles, with views over the Severn to Wales, but they are prevented from reaching it by steps at either end. It is possible to avoid the steps by following the pavement of Woodlands Road and the Esplanade to another pedestrian access close to the junction of route sections ABD-5-S008 and ABD-5-S009. However, the access from the pavement to the grass is not currently suitable for mobility scooter users. The representation includes photographs to illustrate these points which are included in section 5 of this document.

To remedy this problem the Disabled Ramblers recommend that:

- the proposed route is adjusted to include the land between the pavement and ABD-5-S009
- the existing gate and pedestrian gap leading to the grass area is replaced with an arrangement that allows those using mobility scooters to get through it.

The Disabled Ramblers undertakes to submit further recommendations to Natural England separately to be considered as part of the Establishment Works, which Natural England has since received.

Natural England's comment:

We thank the Disabled Ramblers for its representation and in particular welcome the timely focus on adjustments for mobility scooter users. We refer the Secretary of State to the representation from North Somerset Local Access Forum above which makes some similar points, and to our comments there.

We recognise that there have been recent innovations in the design of mobility scooters and that as a result mobility scooters are more versatile and in particular have much longer battery life.

We note that in finalising the schedule and specification of establishment works for any route approved by the Secretary of State, both Natural England and North Somerset Council (the local access authority which will undertake the works) should take all reasonable steps needed to make the trail as easy as possible for disabled people and those with reduced mobility, having regard to British Standard BS5709: 2018 Gaps Gates and Stiles.

Since receiving this representation, we have received further and more detailed suggestions from the Disabled Ramblers as to how best to fulfil this aspiration. We have shared all these suggestions with North Somerset Council.

Natural England and North Somerset Council share the ambition to make the coast path and adjoining margin more accessible to mobility scooter users and in principle agree to the suggestion to modify the access point from the pavement to the grass area over which route sections ABD-5-S009 and ABD-5-S010 to enable mobility vehicle users to get

through it. We will fund the physical works necessary as part of the preparatory works for the route approved by the Secretary of State.

It is not necessary in our view to adjust the proposed route to include this access point, in the way suggested by the Disabled Ramblers in order to secure this improvement. Under our proposal the land between the proposed route and the pavement would form part of the coastal margin and as such would be subject to access rights for people using mobility vehicles. This is as indicated by the coastal margin landward of route section ABD-5-S009 shown on map ABD 5a.

Relevant appended documents (see Section 5):

From the Disabled Ramblers representation *MCA/ABD5/R/2/ABD1843*:

- Photographs illustrating use of mobility vehicles in two rural settings

From the Disabled Ramblers representation *MCA/ABD5/R/3/ABD1843*:

- Photographs illustrating existing barriers for mobility scooter users at section ABD-5-S009 of the proposed route.

Representation ID:	<i>MCA/ABD5/R/1/ABD0912</i>
Organisation/ person making representation:	<i>[Redacted]</i>
Name of site:	<i>Woodside Gardens</i>
Report map reference:	<i>ABD 5c</i>
Route sections on or adjacent to the land:	<i>ABD-5-S037</i>
Other reports within stretch to which this representation also relates	-
Summary of representation:	
<p>[Redacted] is the owner of [a property in] Woodside Gardens. [Redacted] points out that there is not a fence landward of route section ABD-5-S037 which could form the landward boundary of the coastal margin as proposed in column 5b of table 5.3.1. [Redacted] suggests the boundary feature should be described as a wall because there is a 6-foot block wall to the landward of the existing footpath.</p>	
Natural England's comment:	
<p>We thank [redacted] for drawing our attention to this. It is an administrative error on our part which we intend to rectify as described below.</p>	

We have compared the data we hold about the section ABD-5-S037 of the proposed route with the situation on the ground. We found that the position of the boundary feature had been correctly recorded but the description of the feature, as [redacted] says in [their] representation, was incorrect. We have corrected the dataset so that the description of the boundary feature at [redacted] property is recorded as 'wall'. This is the dataset that will be published, should the Secretary of State approve our access proposals for this part of the coast. We have written to [redacted] to inform [them] that we have done so and will shortly publish a new version of the report with an erratum to this effect. We recommend to the Secretary of State that no further action need be taken.

Representation ID:	<i>MCA/ ABD5/ R/5/ ABD1307</i>
Organisation/ person making representation:	<i>Portishead Yacht and Sailing Club</i>
Name of site:	<i>Portishead Yacht and Sailing Club</i>
Report map reference:	<i>ABD 5b</i>
Route sections on or adjacent to the land:	<i>ABD-5-S021</i>
Other reports within stretch to which this representation also relates	-

Summary of representation:

Portishead Yacht and Sailing Club has a 25 year lease (expiry date 31st December 2033) from North Somerset Council to facilitate access to its premises, together with sole use of land (a compound for boat storage), adjoining the coastal footpath at ABD-5-SO21. This requires the footpath to be a minimum width of 2 metres.

In January 2014 as a result of severe weather the footpath between ABD-5-SO21 and ABD-5-SO22 collapsed, causing a temporary loss of access to the boat storage compound. The Club was subsequently successful in securing funds from both North Somerset Council and the Sport England Flood Relief Fund to install a 2 metre wide timber bridge structure thereby enabling the Club to continue to provide community sporting activities.

The Club fully supports Natural England's initiative to improve coastal access, and sees nothing untoward in ensuring that this part of the coastal footpath remains available, but wishes to ensure that a 2 metre corridor is maintained between the Club's slipway and clubhouse to the boat storage compound. If for any reason this was not maintained the viability of the club would be severely compromised and would be unable to function in its present form.

The Club welcomes the statement (in table 5.3.3 of the report) that no decision on 'Roll Back' will be taken without prior discussions with interested parties.

Natural England's comment:

We thank the Portishead Yacht and Sailing Club for its representation and general support for the coastal access proposals.

The path which the club uses to move boats between the slipway and the boat storage compound is an existing public footpath. Since receiving the representation we have written to the club's representatives to confirm that we have no intention of altering the current width of the path and understand the requirement for the width to be maintained at two metres or more in order for boats to be moved along it. We have discussed this with the public rights of way officer at North Somerset Council who concurs with our view. We trust this provides any necessary reassurance to both the club and the Secretary of State with respect to the proposed route at this location.

Relevant appended documents (see Section 5):

The Club attaches a copy of its lease relating to the Boat Storage Compound adjacent to referred to in the representation. This has not been included in section 5 but Natural England will make it available to the Secretary of State on request.

Representation ID:	<i>MCA / ABD Stretch/ R/9/ ABD1911</i>
Organisation/ person making representation:	<i>Wildfowl and Wetlands Trust (WWT)</i>
Name of site:	<i>Aust to Brean (whole stretch)</i>
Report map reference:	-
Route sections on or adjacent to the land:	-
Other reports within stretch to which this representation also relates	<i>All reports within stretch</i>

The Wildfowl & Wetlands Trust (WWT) is the UK's leading wetland conservation charity, with a vision of a world where healthy wetland nature thrives and enriches lives. It works across the UK and internationally to conserve, restore and create wetlands, save wetland wildlife, and inspire people to value the amazing things healthy wetlands achieve for people and nature.

The Aust to Brean Down section of England's coastal path is located along a stretch of the Severn Estuary in between two of WWT's sites, Slimbridge to the north and Steart Marshes to the south. The Trust welcomes the addition of coastal access for visitors and residents, and hopes this will encourage people to explore the wonderful Severn estuary and its wildlife. It supports the development of signage to encourage interest in the waterbirds and wildlife using the estuary.

It welcomes the mitigation measures that have been identified in the Habitats Risk Assessment and Nature Conservation Assessment to reduce the impact on waterbirds and estuarine habitats. It has worked on similar mitigation measures elsewhere in the Severn estuary. It has concerns about relying on adoption of behavioural change outlined on signs to mitigate disturbance, as it is unrealistic to expect that everyone will read and adopt required behaviour displayed on signs.

In order to encourage adoption of behaviour displayed on signs, it suggests that further engagement of the local community may be useful in installing pride and encourage individuals to help warden the area independently.

It encourages further consideration of the need for additional physical measures, such as screens and netting, to prevent people and dogs leaving the path in highly sensitive areas. It says stock netting in areas where people frequently let dogs off leads regardless of signs has proved effective at preventing dogs accessing sensitive areas without compromising visual aesthetics. With regards to seasonal access, it believes it is important that information on when routes are open and shut is made very clear and easy to read. It says that locked gates during the closed period also aids in controlling access.

It suggests follow-up work to check if the mitigation is effective.

Natural England's comment:

We welcome the Wildlife and Wetlands Trust representation and for their support for the overall objective of a continuous route along the lower Severn estuary, the measures we propose to avoid mitigate potential disturbance of waterbirds and the use of branded signs to stimulate public interest in waterbirds.

The representation relates to all the proposals between Aust and Brean Down. Our comments below explain how we think it should be understood in that wider context and, where relevant, in relation to the specific proposals in report ABD5.

Our overall approach to disturbance and mitigation is set out in our published [Habitats Regulations Assessment](#), including the simple set of behavioural messages that we propose to promote to walkers along the estuary.

We agree that it is not realistic to expect everyone to read signs or adhere to behavioural messages and the signs we propose are backed up in some places with additional measures. In [report ABD5](#) we do not propose any additional measures because the patterns of use are well established and we do not foresee any significant changes when the coast path opens – see the assessment of existing access and predicted change in section D3.2C of our HRA.

We agree that fencing can be a useful way to avoid disturbance to waterbirds and this is an option we propose to use in other parts of the estuary, in particular where new sections of path are proposed and walkers or their dogs might otherwise stray off the path into a sensitive area.

We agree with WWT that face-to-face engagement with the local community may be a useful way to help new access arrangements to bed in and we have already begun discussions with two local partner organisations who are interested in doing so.

Overall we are confident in our conclusions that the suite of mitigation measures we propose in the report will give the required level protection. We note WWT's suggestion to check that it operates as expected. There are two arrangements in place that will help with this: first, the requirement for local access authorities to report to Natural England on the condition of the path and associated infrastructure, in order to qualify for central government contribution towards maintenance costs. The second is the ongoing Wetland Birds Survey (WeBS), a national scheme by which we are able to track trends in the populations of wetland bird species using the Severn Estuary.

Length Report 7

Full representations

Representation number:	<i>MCA/ABD Stretch/R/5/ABD1687</i>
Organisation/ person making representation:	<i>North Somerset Council</i>
Route section(s) specific to this representation:	-
Other reports within stretch to which this representation also relates:	<i>ABD4, ABD5, ABD6, ABD8 and ABD9</i>
Representation in full	
<p>North Somerset Council welcomes Natural England’s proposal to establish a path along the North Somerset Coast line between the River Axe and the River Avon. The 32-mile stretch will form part of the England Coast Path National Trail.</p> <p>The England Coastal Path National Trail will be a great resource enabling the public to walk along our coastal regions enjoying our views. This will be a benefit both to local residents and visitors of our area.</p> <p>Natural England have carried out numerous meetings with affected landowners and those with a legal interest in the land affected attempting to strike a fair balance between landowner interests and public access as well as protecting nature conservation sites.</p>	
Natural England’s comments	
<p>We have worked closely with North Somerset Council throughout the development of our coastal access proposals for North Somerset, from Avon Bridge (report ABD4) to Brean Cross Sluice (ABD9). Council officers provided us with technical advice on the various route options under consideration and attended meetings with affected land owners. In particular they provided advice on what infrastructure would be required along the proposed route, estimated establishment costs for the proposals, and potential impacts on archaeological assets and how to avoid them.</p> <p>We thank the Council for its advice and cooperation and ask the Secretary of State to note its views on the benefits for residents and visitors to the area.</p>	

Representation number:	<i>MCA/ABD Stretch/R/7/ABD1899</i>
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Organisation/ person making representation:	<i>The Environment Agency</i>
Route section(s) specific to this representation:	
Other reports within stretch to which this representation also relates:	<i>ABD1, ABD2, ABD4, ABD6, ABD7, ABD10</i>
Representation in full	
<p>The Environment Agency was established in 1996 to protect and improve the environment. We have an operational responsibility for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea, as well as being a coastal erosion risk management authority. Additionally, we have a statutory duty under the Water Resources Act 1991 and the Environmental Permitting Regulations (England and Wales) 2016 to assess and review any works done within 8 metres of fluvial main river and 16 metres of tidal defence.</p> <p>Whilst, we have no “in principle” objections. to the proposals subject to the comments outlined in this response, we will need to assess the acceptability of any detailed matters through the Flood Risk Activity Permit (FRAP) process detailed below:</p> <p>Flood Risk Activity Permit</p> <p>The proposals may require a permit under the Environmental Permitting (England and Wales) Regulations 2010 from the Environment Agency for any proposed works or structures, in, under, over or within sixteen metres of the top of the bank of the Severn Estuary, designated a ‘main river’. An Environmental Permit may also be required for any works on, or within sixteen metres of the landward toe of any Environment Agency designated flood defence structure(s). It is common in larger river systems, or tidal areas, for Environment Agency flood defences to be located in excess of 8 metres from the main channel or coastline, and greater than 20 metres in some instances. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt.</p> <p>A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits. To discuss the scope of the controls please contact the Environment Agency on 03708 506 506 or email: bridgwater.frap@environment-agency.gov.uk .</p> <p>To find the location of Environment Agency flood defence structure and main rivers, together with further information, please refer to our Flood Maps on gov.uk. We would like to agree the location of any signage and new gates you intend to install, which could be done through the Flood Risk Activity Permit process discussed above.</p> <p>It must be noted that any works in proximity of a watercourse other than a main river, may be subject to the regulatory requirements of the Lead Local Flood Authority/Internal Drainage Board (e.g. Lower Severn Internal Drainage Board).</p> <p>Flood Risk considerations</p>	

With regards to the specific sections of the coastal path, we offer the following comments. We ask that any detailed proposals fully address the points raised, to ensure the integrity of coastal defences is not adversely impacted by the coastal path, in the interest of flood risk management.

[At this point in the representation there are a number of detailed comments relating to other reports within the Aust to Brean stretch. These are set out in full in Natural England's comments on representations about the report to which they relate. Here we reproduce only those comments that are relevant to the Secretary of State's consideration of report ABD7.]

ABD7 Huckers Bow to Birnbeck Pier

There are flood defences at Sand Bay, these need to be protected and not damaged. Any works would require a FRAP.

The new steps at the north end of Sand Bay will need to be constructed to ensure no damage to the defences and would require a FRAP.

Fisheries, Biodiversity and Geomorphology

We note within the Aust to Brean Down Habitats Regulations "table 30 other live plans or projects", the Avonmouth Severnside Enterprise Area (ASEA) Ecology and Mitigation Flood Defence Scheme and the Environment Agency's flood defence maintenance programmes are included.

We note that assent from Natural England for the flood defence maintenance programme and Habitats Regulations Assessment (HRA) is renewed on an annual basis. We are seeking a 3 year agreement next year, so it is hoped assent will be sought on a 3 yearly basis in future (for the Bristol Avon catchment). We note we will have to assess in subsequent years how any residual effects from the programme work could interact with residual effects from the Coast Path.

Although identified as having insignificant and combinable effects, the maintenance programme is not included in Table 31 'Risk of in-combination effects' within the Aust to Brean Down HRA, it is unclear whilst this is the case?

Please note in 2019 we received assent for North Somerset maintenance work between the period 2019 - 2021, so any in combination effects between the maintenance plan and coastal path would need to be considered when assent is reapplied for in 2022.

Groundwater and Contaminated Land

We understand that the trail will predominantly utilise existing infrastructure and there is therefore little likelihood of ground disturbance during construction that may encounter contamination or pose a risk to groundwater.

Should ground disturbance be required, the applicant should make appropriate consideration of potential contamination and follow the guidance 'Land Contamination:

Risk Management found at <https://www.gov.uk/government/collections/land-contamination-technical-guidance> for managing the risks.

Next steps

We ask that any further correspondence/queries regarding the Coastal Access Report, are directed to the Wessex Sustainable Places team using the contact details below. We are principal Environment Agency point of contact.

Natural England's comments

The representation relates to all the proposals between Aust and Brean Down. Our comments below explain how we think it should be understood in that wider context and, where relevant, in relation to the specific proposals in report ABD7.

Natural England has worked closely with the Environment Agency throughout the development of the coastal access proposals for Aust to Brean Down. We thank them for their cooperation and advice to date and for the detailed comments in the representation. We welcome confirmation that the Agency has no 'in principle' objections to the proposed access arrangements and look forward to continued close cooperation during the establishment phase of the coast path project, should the Secretary of State approve a route.

We have a good understanding of the Agency's operational requirements at specific locations including Sand Bay. Our existing Agency contacts have made us aware of the requirement to obtain a Flood Risk Activity Permit (FRAP) in relation to some works along any approved route prior to establishment. From our discussions to date, we anticipate that the Agency will permit all necessary works envisaged to establish the proposed route and expect that the Agency may place specific conditions on, for example, the timing or detailed specification of some works in order to ensure compliance with flood risk management objectives. North Somerset Council, the local access authority which will undertake the necessary works, is aware of the FRAP requirement and will acquire the necessary permits before any works commence.

Sections ABD-7-S010 to ABD-7-S019 of the proposed route broadly follow dunes and associated manmade structures that form part of the flood defences at Sand Bay. This is an existing walked route, except at sections ABD-7-S012 and ABD-7-S013 on map 7d, which would follow a new route through dune scrub, which would require steps and regular vegetation management to establish it. This would have recreation and nature conservation benefits as described in table 7.3.2 of [report ABD7](#). In our discussions with the Environment Agency we have explained what works we propose to facilitate pedestrian access along that part of the route and envisage that the FRAP process will confirm that this can be realised without compromise to the flood defence structures.

In respect of our published Habitats Regulations Assessment (HRA), we have clarified since receiving this representation that the Environment Agency's flood maintenance programme is listed among the considerations on row 2, page 142 in table 31 of [the HRA](#). The Environment Agency have confirmed to us that they agree this to be the case. We

thank the Agency for clarifying its intention to consider any in combination effects between the maintenance programme and the coast path as part of its application to Natural England for assent in 2022.

We note the need to consider land contamination risk with respect to any ground disturbance necessary to establish the route. We thank the Agency for supplying the link to the current guidance, which we will pass on to the local access authority coordinating path establishment.

We note the requirement to direct any future queries through the Wessex Sustainable Places team and confirm to the Secretary of State that this new point of contact is now established.

Representation number:	<i>MCA/ABD7/R/5/ABD1662</i>
Organisation/ person making representation:	<i>North Somerset Local Access Forum</i>
Route section(s) specific to this representation:	<i>All route sections, in particular ABD-7-S004, ABD-7-S005 and ABD-7-S011</i>
Other reports within stretch to which this representation also relates:	<i>All within the Aust to Brean Down stretch</i>
Representation in full	
<p>General Points:</p> <ul style="list-style-type: none"> • Whilst specific restrictions on dogs are in place for certain sections of the ECP, there should be an expectation that dogs should be kept under close control at all times • On-site signage and interpretation should only be used after very careful consideration of need and appropriateness to the location. Waymarks should only be used where the route is not abundantly clear and/or where a potential safety hazard may be encountered <p>Point 7.2.9: The land at Middle Hope (maps ABD 7a and ABD 7b) is suitable terrain for off-road mobility scooters. They can choose to follow a more suitable route than the marked trail making use of the extensive coastal margin.</p> <p>Point 7.2.11: indicates that the current field gate is an alternative to the new ladder stile on Middle Hope on map ABD 7b. This field gate has occasionally been found to be locked and is not suitable for off-road mobility scooter riders. Options for an alternative, suitable, gate should be investigated.</p>	
Natural England's comments	

We welcome the representation from the North Somerset Local Access Forum and thank them for the interest they have taken in the development of our coastal access proposals for North Somerset.

The representation makes remarks about access by people with dogs, signs and access for mobility scooter users which we address in that order in our comments below.

Access by people with dogs

Our approach to access by people with dogs is underpinned by the coastal access legislation, the principle of the 'least restrictive option' set out in section 6.3 of the [Coastal Access Scheme](#), and the specific interpretation of that principle at paragraphs 6.7.7 to 6.7.9 of the Scheme.

The default position on the England Coast Path is that people must keep dogs under effective control, although the precise legal requirement may be different where there are pre-existing access rights.

Access legislation defines effective control as meaning that the dog must either be:

- on a lead or:
- within sight of the person and the person remains aware of the dog's actions and has reason to be confident that the dog will return to the person reliably and promptly on the person's command.

It further requires that dogs must be on a lead at all times in the vicinity of livestock.

(See paragraph 6A of [Schedule 2 to the Countryside and Rights of Way Act 2000](#), as amended for the purposes of the coastal margin).

We think that effective control is a clearer and more easily understood expectation than the words 'close control', which are not further defined in law.

We know that many people seek opportunities to exercise their dogs off lead and there are many places at the coast where they may reasonably expect to do so. For these reasons we say that effective control is also a more appropriate general expectation than close control, provided people understand and can comply with its specific requirements.

We support the use of further local restrictions provided that, in accordance with the least restrictive principle, there is a proven need and the restriction used is proportionate to that need. For example in report ABD6, we have proposed that dogs must be on leads at all times in several places in order to minimise disturbance to roosting and feeding waterbirds that are present at most times of year.

Signs

We agree with the Local Access Forum that waymarks, signs and interpretation should be used sparingly and after consideration of the need and suitability to the location. Specific signs and interpretation are in our view necessary and appropriate on this part of the coast path, in particular to alert walkers to the nearby presence of sensitive waterbirds and ask them to adopt certain behaviours in order to reduce the likelihood of disturbance. Small waymark discs are in our view a helpful and unintrusive means to signal the route and give walkers the clarity and confidence to follow it.

Access for mobility scooter users

We welcome the Forum’s advice on adjustments for mobility scooter users.

Its suggestion concerns the design of an existing gate adjacent to the proposed route, should the route be approved by the Secretary of State. Natural England and North Somerset Council share the ambition to make the coast path more accessible to mobility scooter users and in principle agree to the suggestion made to achieve this. This is subject to any practical considerations raised by third parties and to the agreement of the land owner, which must be sought before any works are undertaken.

The suggestion does not imply any modification to the proposed route or to the extent of the associated margin or access rights within it. However, we draw the Secretary of State’s attention to the representations summarised below from the Disabled Ramblers which make some similar and additional points about mobility scooter users – including a proposed modification of the route - and to our comments there.

The representation references particular route sections including route section ABD-7-S011 on map 7c. We can find no specific comment relating to this route section in the representation as set out above and believe the reference to be in error.

Relevant appended documents (see section 5):

General Comments on Accessibility for those with Limited Mobility 17.9.19

Other representations

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:
MCA/ABD Stretch/R/1/ABD1840	[Redacted]
MCA/ABD Overview/R/2/ABD1842	[Redacted]
MCA/ABD Stretch/R/2/ABD1784	The Clevedon Pier and Heritage Trust

<i>MCA/ABD Stretch/R/3/ABD1847</i>	<i>The Clevedon Community Team (CCT)</i>
<i>MCA/ABD Stretch/R/4/ABD1849</i>	<i>The Clevedon Business District (Clevedon BID)</i>
Name of site:	<i>Aust to Brean</i>
Report map reference:	-
Route sections on or adjacent to the land:	-
Other reports within stretch to which these representations also relate	<i>All reports between Aust and Brean Down</i>

Summary of point:

These 5 representations all express support and enthusiasm for the coastal access proposals and have been summarised together for this reason. There are some differences of emphasis which we highlight in the summary below.

[Redacted] is a resident of North Somerset and Ward Councillor for Banwell and Winscombe, a short distance from the coast at Weston-super-Mare. [Redacted] is a local resident and walker. Both express support for the coastal access proposals from Aust to Brean as a whole.

The Clevedon Pier and Heritage Trust, the Clevedon Community Trust (CCT) and the Clevedon Business District (BID) are all Clevedon-based organisations. They confine their comments to the two reports covering the coast between Wain's Hill in Clevedon (report ABD6) and Birnbeck Pier in Weston-super-Mare (report ABD7).

[Redacted] anticipates that the path will promote tourism, sustainable travel and a more active lifestyle. [Redacted] points out that that sustainable travel is part of solutions to the climate crisis declared by North Somerset Council and believes that the coast path can contribute to sustainable travel because it links several coastal towns and so may be used by commuters.

[Redacted] looks forward in particular to walking a path along Woodspring Bay, part of the coast covered in report ABD6 where there is no existing path.

Clevedon Pier and Heritage Trust has responsibility for the UK's only accessible Grade 1 listed pier. It attracts over 100,000 visitors per year many of whom arrive by car. The nearby seaside resort of Weston-Super-Mare is a major tourist draw and the Trust reports an increasing appetite for visitors to walk a coastal path between the two towns. The route from Birnbeck Pier to Clevedon Pier would link these two iconic Victorian structures and reduce the need for people to travel by car to visit them.

The CCT is a local partnership which has developed a collective understanding of the issues facing Clevedon and laid out a local strategy in an Economic Plan. It consists of representatives from a wide range of business organisations, community groups, charitable bodies and local government. The CCT has been a major player in delivering a number of important local projects including the creation of the Clevedon BID, the

inception of the Discover Clevedon brand, bicycle racks on the beachfront and improvements to the Pier Copse park.

The CCT and BID have both agreed to proactively support the new footpath. The path meets a number of their objectives, namely; opening up Clevedon to walkers wishing to traverse the coast from Weston-super-Mare, reducing traffic volumes in the town (there is very little provision for anything other than cars), increased usage of the towns heritage assets (The Marine Lake, The Victorian era Curzon Cinema and the iconic Grade 1 listed Clevedon Pier) and the encouragement of well-being through greater access to areas of natural beauty on the periphery of the town.

Natural England’s comment:

We thank [redacted], [redacted], the Clevedon Pier and Heritage Trust, the Clevedon Community Trust and the Clevedon Business Improvement District for their enthusiastic responses to the coastal access proposals.

We draw the Secretary of State’s attention to the anticipated benefits in terms of tourism, sustainable travel, public enjoyment and well-being.

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:
<i>MCA/ABD7/R/1/ABD1843</i>	<i>The Disabled Ramblers</i>
<i>MCA/ABD7/R/2/ABD1843</i>	<i>The Disabled Ramblers</i>
<i>MCA/ABD7/R/3/ABD1843</i>	<i>The Disabled Ramblers</i>
Name of site:	<i>Huckers Bow to Birnbeck Pier</i>
Report map reference:	<i>ABD 7a-7e</i>
Route sections on or adjacent to the land:	<i>ABD-7-S001 to ABD-7-S008, ABD-7-S012 to ABD-7-S021</i>
Other reports within stretch to which this representation also relates	<i>ABD6</i>
Summary of point:	
<p>The Disabled Ramblers consider that Natural England’s accessibility statement in paragraphs 7.2.9 and 7.2.11 of the report does not recognise that there is a significant and steadily increasing number of people with reduced mobility who use off-road mobility scooters and other mobility vehicles to enjoy routes on more rugged terrain including</p>	

uneven grass, bare soil and sandy paths. It considers the terrain covered by this report to be suitable for this group of people.

The Disabled Ramblers urges Natural England to take fuller account of the needs of mobility scooter users. It points out, with reference to photographic evidence included in section 5 (page 16) the inherent suitability of much of the proposed route for mobility scooters.

The Disabled Ramblers requests that Natural England should take all reasonable steps to make the trail as easy as possible for disabled people and those with reduced mobility, be mindful of British Standard BS5709: 2018 Gaps Gates and Stiles, and reconsider the suitability of existing infrastructure that Natural England has indicated should be retained because in many cases this bars legitimate access by mobility scooters.

The representation includes detailed observations to explain why certain existing access infrastructure along the proposed route present barriers to mobility scooter users. It makes the following specific recommendations to allow access by mobility scooter users, which is backed up with supporting information in section 5 where indicated in brackets:

- modify the proposed route sections ABD-6-S060 and ABD-7-S001 at Huckers Bow sluice to avoid the steps down the side of the sluice structure, which are a barrier to mobility scooter users and others with reduced mobility – see photographs of the steps (page 17) and proposed route modification (pages 18-19)
- replace the pedestrian gate giving access to the coastal margin landward of route section ABD-7-S005 with one that is suitable for mobility scooter users – see photograph of the gate on page 21

The Disabled Ramblers undertakes to submit further recommendations to Natural England separately to be considered as part of the Establishment Works, which Natural England has since received.

Natural England's comment:

We thank the Disabled Ramblers for its representation and in particular welcome the timely focus on adjustments for mobility scooter users. We draw the Secretary of State's attention to the representation above from North Somerset Local Access Forum which makes some similar points, and to our comments there.

We recognise that there have been recent innovations in the design of mobility scooters and that as a result mobility scooters are more versatile and in particular have much longer battery life.

We note that in finalising the schedule and specification of establishment works for any route approved by the Secretary of State, both Natural England and North Somerset Council (the local access authority which will undertake the works) should take all reasonable steps needed to make the trail as easy as possible for disabled people and

those with reduced mobility, having regard to British Standard BS5709: 2018 Gaps Gates and Stiles.

Since receiving this representation, we have received further and more detailed suggestions from the Disabled Ramblers as to how best to fulfil this aspiration. We have shared all these suggestions with North Somerset Council.

Natural England and North Somerset Council share the ambition to make the coast path and adjoining margin more accessible to mobility scooter users and in principle agree with the second suggestion to replace the pedestrian gate shown in the photograph on with one of a more suitable design.

This is subject to practical considerations which may be raised, for example by the affected land owner and tenant, whose agreement must be sought before any works are undertaken. We would fund the physical works necessary as part of the preparatory works for the route approved by the Secretary of State.

Huckers Bow sluice

The Disabled Ramblers propose a route modification at Huckers Bow sluice to allow access to Middle Hope for mobility scooter users. In section 5 below we include their photographs which illustrate the proposed modification. We also include a hand annotated version of report map ABD 7a to show its location (marked option B on the map). The map also shows the location of another route which we believe is also suitable for mobility scooter users (marked route C).

We do not consider it necessary for the Secretary of State to modify Natural England's proposed route, which follows the steps, to enable the desired access to Middle Hope for mobility scooter users. Instead, we recommend that [he] approve that route, noting that it is for Natural England and the local access authority to provide an alternative as part of the establishment works, for those who wish to avoid the steps.

We have begun discussions with other interested parties to see which of options B and C is best in all the circumstances. Once that is agreed, and assuming that the Secretary of State approves the route proposed in our report, we would install waymarks and any other necessary infrastructure to direct people along the chosen alternative route if they wish to avoid the steps.

The Disabled Ramblers proposed route modification (option B) affects sections of the proposed route covered in two reports – route sections ABD-6-S060 and ABD-7-S001 described in reports ABD6 and ABD7 respectively. We refer the Secretary of State to two representations about report 6 which include the same proposal:

- *MCA/ABD6/R/13/ABD1843 from the Disabled Ramblers*
- *MCA/ABD6/R/39/ABD1662 from the North Somerset Local Access Forum*

Our comments about these representations will be submitted in a separate document addressing all the representations about report ABD6 and, with respect to the Disabled Ramblers proposal, will make the same points there.

Relevant appended documents (see Section 5):

From the Disabled Ramblers representation *MCA/ABD7/R/1/ABD1843*:

- Photographs illustrating examples of the capability of mobility vehicles:

From the Disabled Ramblers representation *MCA/ABD7/R/2/ABD1843*:

- Photographs of steps at Huckers Bow sluice which are a barrier to mobility scooter users
- Photographs illustrating proposed route modification at Huckers Bow sluice

From Natural England:

- Hand annotated map indicating the two options for mobility scooter access at Huckers Bow sluice

From the Disabled Ramblers representation *MCA/ABD7/R/3/ABD1843*:

- Photograph of gate adjacent to route section ABD-7-S005 which is unsuitable for mobility scooter access (at grid reference ST32914 66100)

Representation ID:	<i>MCA/ABD7/R/4/ABD1877</i>
Organisation/ person making representation:	<i>Kewstoke Parish Council</i>
Name of site:	<i>ABD7a – 7f Huckers Bow to Birnbeck Pier</i>
Report map reference:	<i>ABD7a – 7f</i>
Route sections on or adjacent to the land:	<i>ABD-7-S001 to ABD-7-S026</i>
Other reports within stretch to which this representation also relates	-
Summary of representation:	
The Parish Council raises two concerns:	

1. Potential issues relating to farmers managing dairy breed bull kept upon land adjacent to route of footpath and risks to walkers
2. Potential increase in the number of people wishing to access the foreshore of Sand Bay through the dune system. This will potentially lead to greater erosion of the fragile sand dunes which forms an important part of the sea defences along Sand Bay.

Natural England's comment:

Natural England thanks the parish council for its representation and notes its two concerns.

Dairy Bulls

The route and coastal margin proposed in report ABD7 consists entirely of land already accessible to the public and well-known to local people. As such, no-one will be newly exposed to such risks as a result of our proposals and we would expect existing risks to have been assessed by the local farmers with necessary mitigation already put in place.

The Secretary of State may wish to note that [report ABD6](#) includes proposals for a new route along the edge of a dairy farm between New Bow and Huckers Bow (route sections ABD-6-S056 to ABD-6-S059 on map 6e), a farm which forms part of Kewstoke Parish. We have discussed this proposal with the farmer on several occasions and, at his request, have offered in writing to install new gates and fences as part of the path establishment works, to reduce the risk of walkers straying into areas of risk. We have not received a representation or objection from the farmer and take this to indicate he is content with the proposal.

Erosion risk

The proposed route follows an existing well-used path, except at route sections ABD-7-S012 and ABD-7-S013 where it would follow a new route through a scrubby, stable section of the dunes to reduce damage to more sensitive saltmarsh vegetation which also forms part of the natural flood defences at Sand Bay.

In section D3.2E of our publish [Habitats Regulations Assessment](#), we set out our assessment of existing recreational use of Sand Bay and predicted changes as a result of the access proposals. Here we explain whom we expect to be newly attracted to Sand Bay by the coast path and why we expect only a small proportion of these people to leave the path to access the foreshore. We do not expect this to give rise to a significant increase in erosion.

We refer the Secretary of State to the representation from the Environment Agency above and our comments, in which we explain why we expect the proposed route and infrastructure to be compatible with flood defence, with reference to the requirement to obtain Flood Risk Activity Permits from the Environment Agency before any works can commence.

Representation ID:	<i>MCA / ABD Stretch/ R/9/ ABD1911</i>
Organisation/ person making representation:	<i>Wildfowl and Wetlands Trust (WWT)</i>
Name of site:	<i>Aust to Brean (whole stretch)</i>
Report map reference:	-
Route sections on or adjacent to the land:	-
Other reports within stretch to which this representation also relates	<i>All reports within stretch</i>

The Wildfowl & Wetlands Trust (WWT) is the UK's leading wetland conservation charity, with a vision of a world where healthy wetland nature thrives and enriches lives. It works across the UK and internationally to conserve, restore and create wetlands, save wetland wildlife, and inspire people to value the amazing things healthy wetlands achieve for people and nature.

The Aust to Brean Down section of England's coastal path is located along a stretch of the Severn Estuary between two WWT sites, Slimbridge to the north and Steart Marshes to the south. WWT welcomes the addition of coastal access for visitors and residents, and hopes it will encourage people to explore the Severn estuary and its wildlife.

WWT welcomes the mitigation measures that have been identified in the Habitats Risk Assessment and Nature Conservation Assessment to reduce the impact on waterbirds and estuarine habitats. It has worked on similar mitigation measures elsewhere in the Severn estuary.

It supports the development of signage to encourage interest in the waterbirds and wildlife using the estuary. It expresses concern about relying on signs to effect behavioural change, as it is unrealistic to expect that everyone will read and adopt required behaviour displayed on signs.

In order to encourage adoption of behaviour displayed on signs, it suggests further engagement of the local community to raise awareness of the sensitivity and value of the estuary, install pride and encourage individuals to help warden the area independently.

WWT encourages consideration of additional physical measures, such as screens and netting, to prevent people and dogs leaving the path in highly sensitive areas. In areas where people frequently let dogs off leads it says stock netting has proved effective at preventing dogs entering sensitive areas without compromising visual aesthetics. Where

there is seasonal access, it believes that information on when routes are open and shut must be very clear and that management with locked gates during the closed period also aids in controlling access. It suggests follow-up work to identify whether the mitigation methods are effective in reducing disturbance to waterbirds.

Natural England's comment:

We thank the Wildlife and Wetlands Trust for its representation and support for the overall objective of a continuous route along the lower Severn estuary, the measures we propose to avoid mitigate potential disturbance of waterbirds and the use of branded signs to stimulate public interest in waterbirds.

The representation relates to all the proposals between Aust and Brean Down. Our comments below explain how we think it should be understood in that wider context and, where relevant, in relation to the specific proposals in report ABD7.

Our overall approach to disturbance and mitigation is set out in our published [Habitats Regulations Assessment](#) (HRA), including the simple set of behavioural messages that we propose to promote to walkers along the estuary.

We agree that it is not realistic to expect everyone to read signs or adhere to behavioural messages and the signs we propose are backed up in some places with additional measures. [In report ABD7](#) the patterns of use are well established and we do not foresee any significant changes when the coast path opens – see the assessment of existing access and predicted change in section D3.2E of our HRA. Nevertheless we propose some additional physical measures to reduce existing disturbance to the north of Huckers Bow sluice, as set out on page 3 of the report.

We agree that fencing (or other barriers) can help to avoid disturbance to waterbirds and this is an option we propose to use in some places, where walkers or their dogs might otherwise stray off the path into a sensitive area. For example on page 3 of the report we propose to install a fence on the saltmarsh seaward of route sections ABD-7-S001 and ABD-7-S002 to discourage access to nearby areas of the foreshore where waterbirds are known to feed and roost. This fence has already been installed since publication of the report with the Environment Agency's cooperation and funding.

We agree with WWT that face-to-face engagement with the local community may be a useful way to help new access arrangements to bed in and we have already begun discussions with two local partner organisations who are interested in doing so.

Overall we are confident in our conclusions that the suite of mitigation measures we propose in the report will give the required level protection. We note WWT's suggestion to check that it operates as expected. There are two arrangements in place that will help with this: first, the requirement for local access authorities to report to Natural England on the condition of the path and associated infrastructure, in order to qualify for central government contribution towards maintenance costs. The second is the ongoing Wetland Birds Survey (WeBS), a national scheme by which we are able to track trends in the populations of wetland bird species using the Severn Estuary.

Length Report 8

Full representations

Representation number:	<i>MCA/ABD Stretch/R/5/ ABD1687</i>
Organisation/ person making representation:	<i>North Somerset Council</i>
Route section(s) specific to this representation:	-
Other reports within stretch to which this representation also relates:	<i>ABD 4, ABD5, ABD6, ABD7 and ABD 9</i>
Representation in full	
<p>North Somerset Council welcomes Natural England’s proposal to establish a path along the North Somerset Coast line between the River Axe and the River Avon. The 32-mile stretch will form part of the England Coast Path National Trail.</p> <p>The England Coastal Path National Trail will be a great resource enabling the public to walk along our coastal regions enjoying our views. This will be a benefit both to local residents and visitors of our area.</p> <p>Natural England have carried out numerous meetings with affected landowners and those with a legal interest in the land affected attempting to strike a fair balance between landowner interests and public access as well as protecting nature conservation sites.</p>	
Natural England’s comments	
<p>We have worked closely with North Somerset Council throughout the development of our coastal access proposals for North Somerset, from Avon Bridge (report ABD4) to Brean Cross Sluice (ABD9). Council officers provided us with technical advice on the various route options under consideration and attended meetings with affected land owners. In particular they provided advice on what infrastructure would be required along the proposed route, estimated establishment costs for the proposals, and potential impacts on archaeological assets and how to avoid them.</p> <p>We thank the Council for its advice and cooperation and ask the Secretary of State to note its views on the benefits for residents and visitors to the area.</p>	
Representation number:	<i>MCA/ABD8/R/2/ABD1662</i>

Organisation/ person making representation:	<i>North Somerset Local Access Forum</i>
Route section(s) specific to this representation:	<i>ABD-8-S007</i>
Other reports within stretch to which this representation also relates:	-
Representation in full	
<p>General Points:</p> <ul style="list-style-type: none"> • Whilst specific restrictions on dogs are in place for certain sections of the ECP, there should be an expectation that dogs should be kept under close control at all times • On-site signage and interpretation should only be used after very careful consideration of need and appropriateness to the location. Waymarks should only be used where the route is not abundantly clear and/or where a potential safety hazard may be encountered <p>Mobility scooters cannot access the Coast Path between Sand Bay and Weston-super-Mare promenade. However they can access the Coast Path heading south from the steps at ABD-8-S007.</p> <p>Point 8.2.9: Weston-super-Mare beach <i>is</i> suitable terrain for off-road mobility scooters</p> <p>Point 8.2.10: Where the beach can cannot be accessed from the promenade by existing steps. It can be accessed via the on-beach car parks</p>	
Natural England's comments	
<p>We welcome the representation from the North Somerset Local Access Forum and thank them for the interest they have taken in the development of our coastal access proposals for North Somerset.</p> <p>The representation makes remarks about access by people with dogs, signs and access for mobility scooter users which we address in that order in our comments below.</p> <p><u>Access by people with dogs</u></p> <p>Our approach to access by people with dogs is underpinned by the coastal access legislation, the principle of the 'least restrictive option' set out in section 6.3 of the Coastal Access Scheme, and the specific interpretation of that principle at paragraphs 6.7.7 to 6.7.9 of the Scheme.</p>	

The default position on the England Coast Path is that people must keep dogs under effective control, although the precise legal requirement may be different where there are pre-existing access rights.

Access legislation defines effective control as meaning that the dog must either be:

- on a lead or:
- within sight of the person and the person remains aware of the dog's actions and has reason to be confident that the dog will return to the person reliably and promptly on the person's command.

It further requires that dogs must be on a lead at all times in the vicinity of livestock.

(See paragraph 6A of [Schedule 2 to the Countryside and Rights of Way Act 2000](#), as amended for the purposes of the coastal margin.)

We think that effective control is a clearer and more easily understood expectation than the words 'close control', which are not further defined in law.

We know that many people seek opportunities to exercise their dogs off lead and there are many places at the coast where they may reasonably expect to do so. For these reasons we say that effective control is also a more appropriate general expectation than close control, provided people understand and can comply with its specific requirements.

We support the use of further local restrictions provided that, in accordance with the least restrictive principle, there is a proven need and the restriction used is proportionate to that need. For example in report ABD6, we have proposed that dogs must be on leads at all times in several places in order to minimise disturbance to roosting and feeding waterbirds that are present at most times of year.

Signs

We agree with the Local Access Forum that waymarks, signs and interpretation should be used sparingly and after consideration of the need and suitability to the location. Signs are necessary on this part of the coast to direct people along the route and give walkers the clarity and confidence to follow it. They will be chosen and positioned to be clear but unintrusive.

Access for mobility scooter users

We welcome the Forum's advice on access for mobility scooter users. Our understanding is that it does not imply any modification of the proposed route or the extent of the associated margin and the access rights within it.

We agree with the Forum that the promenade south of the steps at route section ABD-8-S007 is suitable for mobility scooter users. We also agree that the surface of Weston

beach is generally suitable for use by mobility scooters and, with this in mind, the route proposed uses an existing ramp between the beach and the promenade (the junction of route sections ABD-8-S014 and ABD-8-S015) that is accessible for mobility scooter users. As the Forum notes, there are ramps adjacent to the trail in other places which are also available to mobility scooter users, including the ramp to the carpark at the south end of the promenade.

We draw the Secretary of State’s attention to the representations summarised below from the Disabled Ramblers which makes some similar points, and to our comments there.

Relevant appended documents (see section 5):

General Comments on Accessibility for those with Limited Mobility 17.9.19.

Other representations

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:
<i>MCA/ABD Stretch/R/1/ABD1840</i>	<i>[Redacted]</i>
<i>MCA/ABD Overview/R/2/ABD1842</i>	<i>[Redacted]</i>
Name of site:	<i>Aust to Brean</i>
Report map reference:	-
Route sections on or adjacent to the land:	-
Other reports within stretch to which this representation also relates	<i>All reports between Aust and Brean Down</i>
Summary of point:	
<p>[Redacted] is a resident of North Somerset and Ward Councillor for Banwell and Winscombe, a short distance from the coast at Weston-super-Mare. [Redacted] is a local resident and walker. Both express support and enthusiasm for the coastal access proposals from Aust to Brean as a whole.</p> <p>[Redacted] anticipates that the path will promote tourism, sustainable travel and a more active lifestyle. [Redacted] points out that that sustainable travel should play a major</p>	

part in finding solutions to the climate crisis declared by North Somerset Council and believes that the coast path can contribute to sustainable travel because it links several coastal towns and so may be used by commuters.

[Redacted] looks forward in particular to walking a path along Woodspring Bay, part of the coast covered in report ABD6 where there is no existing path.

Natural England’s comment:

We thank [redacted] and [redacted] for their enthusiastic responses to the coastal access proposals. We draw the Secretary of State’s attention to the anticipated benefits of our coastal access proposals both with respect to sustainable travel and public enjoyment.

Representation ID:	<i>MCA/ABD8/R/1/ABD1843</i>
Organisation/ person making representation:	<i>The Disabled Ramblers</i>
Name of site:	<i>Birnbeck Pier to Uphill Beach, in particular Clarence Park to Uphill</i>
Report map reference:	<i>ABD 8c</i>
Route sections on or adjacent to the land:	<i>ABD-8-S015 and ABD-8-S016</i>
Other reports within stretch to which this representation also relates	-
Summary of representation:	
<p>The Disabled Ramblers consider that Natural England, in the Accessibility statement 8.2.9 in <i>Report ABD 8: Birnbeck Pier to Uphill Beach</i> has not recognised that there is a significant and steadily increasing number of people with reduced mobility who use off-road mobility scooters and other mobility vehicles to enjoy routes on more rugged terrain including passing over beaches.</p>	
Natural England’s comment:	
<p>We thank the Disabled Ramblers for its representation and in particular welcome the timely focus on access for mobility scooter users. We recognise that there have been recent innovations in the design of mobility scooters and that as a result mobility scooters are more versatile and in particular have much longer battery life.</p>	

We draw the Secretary of State's attention to the representation above from North Somerset Local Access Forum which makes some similar points, and to our comments there.

Relevant appended documents (see section 5):

Photograph of Mobility scooters enjoying a beach.

Representation ID:	<i>MCA/ABD Stretch/R/9/ABD1911</i>
Organisation/ person making representation:	<i>Wildfowl and Wetlands Trust (WWT)</i>
Name of site:	<i>Aust to Brean (whole stretch)</i>
Report map reference:	-
Route sections on or adjacent to the land:	-
Other reports within stretch to which this representation also relates	<i>All reports within stretch</i>

The Wildfowl & Wetlands Trust (WWT) is the UK's leading wetland conservation charity, with a vision of a world where healthy wetland nature thrives and enriches lives. It works across the UK and internationally to conserve, restore and create wetlands, save wetland wildlife, and inspire people to value the amazing things healthy wetlands achieve for people and nature.

The Aust to Brean Down section of England's coastal path is located along a stretch of the Severn Estuary between two WWT sites, Slimbridge to the north and Steart Marshes to the south. WWT welcomes the addition of coastal access for visitors and residents, and hopes it will encourage people to explore the Severn estuary and its wildlife.

WWT welcomes the mitigation measures that have been identified in the Habitats Risk Assessment and Nature Conservation Assessment to reduce the impact on waterbirds and estuarine habitats. It has worked on similar mitigation measures elsewhere in the Severn estuary.

It supports the development of signage to encourage interest in the waterbirds and wildlife using the estuary. It expresses concern about relying on signs to effect behavioural change,

as it is unrealistic to expect that everyone will read and adopt required behaviour displayed on signs.

In order to encourage adoption of behaviour displayed on signs, it suggests further engagement of the local community to raise awareness of the sensitivity and value of the estuary, install pride and encourage individuals to help warden the area independently.

WWT encourages consideration of additional physical measures, such as screens and netting, to prevent people and dogs leaving the path in highly sensitive areas. In areas where people frequently let dogs off leads it says stock netting has proved effective at preventing dogs entering sensitive areas without compromising visual aesthetics. Where there is seasonal access, it believes that information on when routes are open and shut must be very clear and that management with locked gates during the closed period also aids in controlling access.

It suggests follow-up work to identify whether the mitigation methods are effective in reducing disturbance to waterbirds.

Natural England's comment:

We welcome the Wildlife and Wetlands Trust representation and for their support for the overall objective of a continuous route along the lower Severn estuary, the measures we propose to avoid mitigate potential disturbance of waterbirds and the use of branded signs to stimulate public interest in waterbirds.

The representation relates to all the proposals between Aust and Brean Down. Our comments below explain how we think it should be understood in that wider context and, where relevant, in relation to the specific proposals in report ABD8.

Our overall approach to disturbance and mitigation is set out in our published [Habitats Regulations Assessment](#) (HRA), including the simple set of behavioural messages that we propose to promote to walkers along the estuary. [In report ABD8](#) we do not propose any mitigation measures for nature conservation because we do not foresee any significant changes when the coast path opens – see the assessment of existing access and predicted change in section D3.2E of our HRA.

We agree that it is not realistic to expect everyone to read signs or adhere to behavioural messages and the signs we propose elsewhere are backed up in some places with additional measures.

We agree that fencing (or other barriers) can be a useful way to avoid disturbance to waterbirds and this is an option we propose to use on parts of the estuary covered by other reports, in particular where new sections of path area proposed and walkers or their dogs might otherwise stray off the path into a sensitive area. We see no reason to use it on the coast covered by this report because there is no appreciable risk, as we explain on page 113 of the HRA.

We agree with WWT that face-to-face engagement with the local community may be a useful way to help new access arrangements to bed in and we have already begun discussions with two local partner organisations who are interested in doing so.

Overall we are confident in our conclusions that the suite of mitigation measures we propose in the report will give the required level protection. We note WWT's suggestion to check that it operates as expected. There are two arrangements in place that will help with this: first, the requirement for local access authorities to report to Natural England on the condition of the path and associated infrastructure, in order to qualify for central government contribution towards maintenance costs. The second is the ongoing Wetland Birds Survey (WeBS), a national scheme by which we are able to track trends in the populations of wetland bird species using the Severn Estuary.

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Full representations

Representation number:	<i>MCA/ABD Stretch/R/5/ ABD1687</i>
Organisation/ person making representation:	<i>North Somerset Council</i>
Route section(s) specific to this representation:	-
Other reports within stretch to which this representation also relates:	<i>ABD 4, ABD5, ABD6, ABD7 and ABD 8</i>
Representation in full	
<p>North Somerset Council welcomes Natural England’s proposal to establish a path along the North Somerset Coast line between the River Axe and the River Avon. The 32-mile stretch will form part of the England Coast Path National Trail.</p> <p>The England Coastal Path National Trail will be a great resource enabling the public to walk along our coastal regions enjoying our views. This will be a benefit both to local residents and visitors of our area.</p> <p>Natural England have carried out numerous meetings with affected landowners and those with a legal interest in the land affected attempting to strike a fair balance between landowner interests and public access as well as protecting nature conservation sites.</p>	
Natural England’s comments	
<p>We have worked closely with North Somerset Council throughout the development of our coastal access proposals for North Somerset, from Avon Bridge (report ABD4) to Brean Cross Sluice (ABD9). Council officers provided us with technical advice on the various route options under consideration and attended meetings with affected land owners. In particular they provided advice on what infrastructure would be required along the proposed route, estimated establishment costs for the proposals, and potential impacts on archaeological assets and how to avoid them.</p> <p>We thank the Council for its advice and cooperation and ask the Secretary of State to note its views on the benefits for residents and visitors to the area.</p>	

Representation number:	<i>MCA/ABD9/R/3/ABD1662</i>
Organisation/ person making representation:	<i>North Somerset Local Access Forum</i>

Route section(s) specific to this representation:	<i>ABD-9-S001 to ABD-9-S010, ABD-9-S020 to ABD-9-S024 and ABD-9-S028</i>
Other reports within stretch to which this representation also relates:	-
Representation in full	
<p>General Points:</p> <ul style="list-style-type: none"> • Whilst specific restrictions on dogs are in place for certain sections of the ECP, there should be an expectation that dogs should be kept under close control at all times • On-site signage and interpretation should only be used after very careful consideration of need and appropriateness to the location. Waymarks should only be used where the route is not abundantly clear and/or where a potential safety hazard may be encountered. <p>Point 9.2.8:</p> <ul style="list-style-type: none"> • The beach is accessible to off-road mobility scooters although it is possible that the footpath at ABD-9-S007 FP may be too narrow. If impassable the footpath can be avoided by diverting from the beach at the northwest end of ABD-9-S001 onto Links Road and re-joining the Coast Path at ABD-9-S010. • The stretch along the flood bank at ABD-9-S021 is usable by off-road mobility scooters. It is anticipated that pavement scooters would divert from the Coast Path at this point, continuing along the Cycle Route to re-join the Coast Path at ABD-9-S024. <p>Point 9.2.9: There is a Bristol Gate at ABD-9-S020FP which is a barrier to off-road mobility scooter riders. It should be replaced with a suitable gate to allow access.</p> <p>ABD-9-S022 is currently a barrier to off-road mobility scooter riders. It consists of three parts: a) steps down from the flood bank, leading to b) a footbridge, leading to c) a kissing gate. The steps can be changed by running a track obliquely up the flood bank near steps (a) for off-road mobility scooters to use. The footbridge is accessible. The kissing gate (c) is very small and should be replaced by a suitable two-way gate to enable off-road mobility scooter access.</p> <p>At ABD-9-S028 there is an existing A frame barrier which is not marked on the consultation maps. This has a width of about 71cm (scooters can legally be up to 85cm wide). The purpose of this barrier is not clear and at present it will prevent the legal access of off-road mobility scooters.</p>	
Natural England's comments	

We welcome the representation from the North Somerset Local Access Forum and thank them for the interest they have taken in the development of our coastal access proposals for North Somerset.

The representation makes remarks about access by people with dogs, signs and access for mobility scooter users which we address in that order in our comments below.

Access by people with dogs

Our approach to access by people with dogs is underpinned by the coastal access legislation, the principle of the 'least restrictive option' set out in section 6.3 of the [Coastal Access Scheme](#), and the specific interpretation of that principle at paragraphs 6.7.7 to 6.7.9 of the Scheme.

The default position on the England Coast Path is that people must keep dogs under effective control, although the precise legal requirement may be different where there are pre-existing access rights.

Access legislation defines effective control as meaning that the dog must either be:

- on a lead or:
- within sight of the person and the person remains aware of the dog's actions and has reason to be confident that the dog will return to the person reliably and promptly on the person's command.

It further requires that dogs must be on a lead at all times in the vicinity of livestock.

(See paragraph 6A of [Schedule 2 to the Countryside and Rights of Way Act 2000](#), as amended for the purposes of the coastal margin).

We think that effective control is a clearer and more easily understood expectation than the words 'close control', which are not further defined in law.

We know that many people seek opportunities to exercise their dogs off lead and there are many places at the coast where they may reasonably expect to do so. For these reasons we say that effective control is also a more appropriate general expectation than close control, provided people understand and can comply with its specific requirements.

We support the use of further local restrictions provided that, in accordance with the least restrictive principle, there is a proven need and the restriction used is proportionate to that need. For example in report ABD6, we have proposed that dogs must be on leads at all times in several places in order to minimise disturbance to roosting and feeding waterbirds that are present at most times of year.

Signs

We agree with the Local Access Forum that waymarks, signs and interpretation should be used sparingly and after consideration of the need and suitability to the location. Specific signs and interpretation are in our view necessary and appropriate on this part of the coast path, in particular to explain the sensitivity of waterbirds to disturbance and promote a simple code of behaviour which walkers can use to minimise disturbance. Small waymark discs will also be necessary and are in our view a helpful and unobtrusive means to signal the route and give walkers the clarity and confidence to follow the route.

Access for mobility scooter users

We welcome the Forum’s advice on adjustments for mobility scooter users. Its suggestions concern the choice and design of existing and new structures along the proposed routes, should it be approved by the Secretary of State: they do not imply any modification of the proposed routes or the extent of the associated margin and the access rights within it.

Natural England and North Somerset Council share the ambition to make the coast path more accessible to mobility scooter users and in principle agree to the suggestions made to achieve this. This is subject to practical considerations which may be raised by other interests in the land, including any requirements of the Flood Risk Activity Permit issued by the Environment Agency and the agreement of other affected land owners, which must be sought before any works are undertaken.

We draw the Secretary of State’s attention to the representations summarised below from the Disabled Ramblers which makes some similar points, and to our comments there.

Relevant appended documents (see section 5):

General Comments on Accessibility for those with Limited Mobility 17.9.19

Other representations

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:
<i>MCA/ABD Stretch/R/1/ABD1840</i>	<i>[Redacted]</i>
<i>MCA/ABD Overview/R/2/ABD1842</i>	<i>[Redacted]</i>
Name of site:	<i>Aust to Brean</i>

Report map reference:	-
Route sections on or adjacent to the land:	-
Other reports within stretch to which this representation also relates	<i>All reports between Aust and Brean Down</i>
<p>Summary of point:</p> <p>[Redacted] is a resident of North Somerset and Ward Councillor for Banwell and Winscombe, a short distance from the coast at Weston-super-Mare. [Redacted] is a local resident and walker. Both express support and enthusiasm for the coastal access proposals from Aust to Brean as a whole.</p> <p>[Redacted] anticipates that the path will promote tourism, sustainable travel and a more active lifestyle. [Redacted] points out that that sustainable travel should play a major part in finding solutions to the climate crisis declared by North Somerset Council and believes that the coast path can contribute to sustainable travel because it links several coastal towns and so may be used by commuters.</p> <p>[Redacted] looks forward in particular to walking a path along Woodspring Bay, part of the coast covered in report ABD6 where there is no existing path.</p>	
<p>Natural England's comment:</p> <p>We thank [redacted] and [redacted] for their enthusiastic responses to the coastal access proposals. We draw the Secretary of State's attention to the anticipated benefits of our coastal access proposals both with respect to sustainable travel and public enjoyment.</p>	

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:
<i>MCA/ABD9/R/1/ABD1843</i>	<i>The Disabled Ramblers</i>
<i>MCA/ABD9/R/2/ABD1843</i>	<i>The Disabled Ramblers</i>
Name of site:	<i>Uphill Beach to Brean Cross Sluice</i>
Report map reference:	<i>ABD 9a and 9b</i>
Route sections on or adjacent to the land:	<i>ABD-9-S001 to ABD-9-S028</i>

Other reports within stretch to which this representation also relates

-

Summary of point:

The Disabled Ramblers urges Natural England to take fuller account of the needs of mobility scooter users. It points out (with reference to photographic evidence included in section 5) the inherent suitability of much of the proposed route between Uphill Beach and Brean Cross Sluice for mobility scooters, including the beach, and the potential for mobility scooter users to reach this part of the coast path from Weston-super-Mare, should the Secretary of State approve proposals set out in report ABD8.

The Disabled Ramblers requests that Natural England should take all reasonable steps to make the trail as easy as possible for disabled people and those with reduced mobility, be mindful of British Standard BS5709: 2018 Gaps Gates and Stiles, and reconsider the suitability of existing infrastructure that it has indicated should be retained because in many cases this bars legitimate access by mobility scooters.

The representation includes detailed observations to explain why certain existing access infrastructure along the proposed route present barriers to mobility scooter users. It makes the following specific recommendations to allow access by mobility scooter users to and from the floodbank at route sections ABD-9-S022 and ABD-9-S023:

- check the existing footbridge has suitable load bearing capacity for mobility vehicles, strengthening it if necessary.
- remove the existing kissing gate and replace it with a gate that allows access for mobility scooters.
- add an alternative path obliquely along the slope of the floodbank, by widening part of the side of the flood bank near the steps to create a suitable path.

The Disabled Ramblers undertakes to submit further recommendations to Natural England separately to be considered as part of the Establishment Works, which Natural England has since received.

Natural England's comment:

We thank the Disabled Ramblers for its representation and in particular welcome the timely focus on adjustments for mobility scooter users. We draw the Secretary of State's attention to the representation above from North Somerset Local Access Forum which makes some similar points, and to our comments there.

The suggestions made by them concern the choice and design of existing and new structures along the proposed routes, should it be approved by the Secretary of State: they do not imply any modification of the proposed route or to the extent of the associated margin or the access rights within it.

We recognise that there have been recent innovations in the design of mobility scooters and that as a result mobility scooters are more versatile and in particular have much longer battery life.

We note that in finalising the schedule and specification of establishment works for any route approved by the Secretary of State, both Natural England and North Somerset Council (the local access authority which will undertake the works) should take all reasonable steps needed to make the trail as easy as possible for disabled people and those with reduced mobility, having regard to British Standard BS5709: 2018 Gaps Gates and Stiles.

Since receiving this representation, we have received further and more detailed suggestions from the Disabled Ramblers as to how best to fulfil this aspiration for the proposed route between Uphill Beach and Brean Down Sluice. We have shared these suggestions with North Somerset Council.

Natural England and North Somerset Council share the ambition to make the coast path from Uphill Beach to Brean Cross Sluice more accessible to mobility scooter users and in principle agree to the suggestions made to achieve this. This is subject to practical considerations which may be raised by other interests in the land, including any requirements of the Flood Risk Activity Permit issued by the Environment Agency and the agreement of other affected land owners, which must be sought before any works are undertaken.

Relevant appended documents (see section 5):

From the Disabled Ramblers representation *MCA/ABD9/R/1/ABD1843*:

- Photographs illustrating use of mobility vehicle on uneven grass path and beach

From the Disabled Ramblers representation *MCA/ABD9/R/2/ABD1843*:

- Photographs of steps and gate at route sections ABD-9-S022 and ABD-9-S023 that impede mobility scooter users
- Photograph illustrating how mobility scooter users could avoid the steps at route section ABD-9-S022

Representation ID:	<i>MCA/ABD9/R/4/ABD1684</i>
Organisation/ person making representation:	<i>Avon Wildlife Trust</i>
Name of site:	<i>Uphill Beach to Brean Cross Sluice</i>
Report map reference:	<i>Map ABD 9a Uphill to Walborough</i>

Route sections on or adjacent to the land:	<i>ABD 9-S015 CP – ABD 9-S020 FP</i>
Other reports within stretch to which this representation also relates	-
<p>Summary of representation:</p> <p>Avon Wildlife Trust owns and manages Walborough Nature Reserve. The reserve consists of an area of limestone grassland seaward of route sections ABD-9-S016 to ABD-9-S019, and an area of saltmarsh seaward of route section ADB-9-S016 which it describes as the ‘managed retreat’ and which we refer to in our report as Walborough saltmarsh.</p> <p>The Trust appreciates the efforts Natural England has taken to site the path in the least sensitive location around the reserve. It would prefer access rights to be excluded to the limestone grassland and in particular the saltmarsh, which contains rare species such as Slender hare’s-ear.</p> <p>If this is not possible it wishes to use fencing and signs to the same purpose. It would like to put in improved / new signs at either side of Walborough Hill explaining why people should stick to the existing paths rather than roaming freely across the hill. It asks for input into the design and content of the new interpretation panels on the site.</p>	
<p>Natural England’s comment:</p> <p>We thank the Avon Wildlife Trust for its cooperation during the development of our coastal access proposals for this part of the coast.</p> <p>We recognise the sensitivity of the grassland vegetation on Walborough Nature Reserve and our proposed route avoids it, including the public footpath around the seaward edge of the Hill that provides better views of the sea – see table 9.3.2 of report ABD9.</p> <p>Avon Wildlife Trust would prefer an exemption for these two areas, which we take to mean statutory exclusion of the access rights that would be created there should the Secretary of State approve the route. Our view is that statutory exclusions are not necessary because the patterns of use are already well established and unlikely to change as a result of the access proposals – see part D3.2F of our published Habitats Regulations Assessment. The Trust can continue to use fencing as currently to discourage people from entering the saltmarsh/managed retreat area.</p> <p>We agree with the Trust that people should be encouraged to stick to the existing footpaths in these areas and we have offered to fund installation of new interpretation panels to help with this – see pages 3 and 4 of report ABD9. Following receipt of the representation we met Avon Wildlife Trust and confirmed to them that we would welcome their involvement in the design and content of these panels.</p>	

Representation number:	<i>MCA / ABD Stretch/ R/9/ ABD1911</i>
Organisation/ person making representation:	<i>Wildfowl and Wetlands Trust (WWT)</i>
Name of site:	<i>Aust to Brean (whole stretch)</i>
Report map reference:	-
Route sections on or adjacent to the land:	-
Other reports within stretch to which this representation also relates:	<i>All reports within stretch</i>

Summary of representation:

The Wildfowl & Wetlands Trust (WWT) is the UK's leading wetland conservation charity, with a vision of a world where healthy wetland nature thrives and enriches lives. It works across the UK and internationally to conserve, restore and create wetlands, save wetland wildlife, and inspire people to value the amazing things healthy wetlands achieve for people and nature.

The Aust to Brean Down section of England's coastal path is located along a stretch of the Severn Estuary between two WWT sites, Slimbridge to the north and Steart Marshes to the south. WWT welcomes the addition of coastal access for visitors and residents, and hopes it will encourage people to explore the Severn estuary and its wildlife.

WWT welcomes the mitigation measures that have been identified in the Habitats Risk Assessment and Nature Conservation Assessment to reduce the impact on waterbirds and estuarine habitats. It has worked on similar mitigation measures elsewhere in the Severn estuary.

It supports the development of signage to encourage interest in the waterbirds and wildlife using the estuary. It expresses concern about relying on signs to effect behavioural change; it believes it is unrealistic to expect that everyone will read and adopt required behaviour displayed on signs.

In order to encourage adoption of behaviour displayed on signs, it suggests further engagement of the local community to raise awareness of the sensitivity and value of the estuary, install pride and encourage individuals to help warden the area independently.

WWT encourages consideration of additional physical measures, such as screens and netting, to prevent people and dogs leaving the path in highly sensitive areas. In areas where people frequently let dogs off leads it says stock netting has proved effective at preventing dogs entering sensitive areas without compromising visual aesthetics. Where there is seasonal access, it believes that information on when routes are open and shut must be very clear and that management with locked gates during the closed period also aids in controlling access.

It suggests follow-up work to identify whether the mitigation methods are effective in reducing disturbance to waterbirds.

Natural England's comments

We welcome the Wildlife and Wetlands Trust representation and for their support for the overall objective of a continuous route along the lower Severn estuary, the measures we propose to mitigate potential disturbance of waterbirds and the use of branded signs to stimulate public interest in waterbirds.

The representation relates to all the proposals between Aust and Brean Down. Our comments below explain how we think it should be understood in that wider context and, where relevant, in relation to the specific proposals in report ABD9.

Our overall approach to disturbance and mitigation is set out in our published [Habitats Regulations Assessment](#) (HRA), including the simple set of behavioural messages that we propose to promote to walkers along the estuary.

We agree that it is not realistic to expect everyone to read signs or adhere to behavioural messages and the signs we propose are backed up in some places with additional measures. [In report ABD9](#) we do not propose any mitigation measures other than new signs because the patterns of use are well established and we do not foresee any significant changes when the coast path opens – see the assessment of existing access and predicted change in section D3.2F of our HRA.

We agree that fencing (or other barriers) can be a useful way to avoid dogs in particular from straying into sensitive areas and this is an option we have used in some places, in particular where new sections of path are proposed and walkers or their dogs might otherwise stray off the path into a sensitive area. For example, the existing path across Brean Cross Sluice features a wooden screen across the river channel., which was designed and installed with advice and financial support from Natural England. This has proved effective in allowing walkers and cyclists to observe waterbirds at close quarters without disturbing them.

We agree with WWT that face-to-face engagement with the local community may be a useful way to help new access arrangements to bed in and we have already begun discussions with two local partner organisations who are interested in doing so.

Overall we are confident in our conclusions that the suite of mitigation measures we propose in the report will give the required level protection. We note WWT's suggestion to check that it operates as expected. There are two arrangements in place that will help with this: first, the requirement for local access authorities to report to Natural England on the condition of the path and associated infrastructure, in order to qualify for central government contribution towards maintenance costs. The second is the ongoing Wetland

Birds Survey (WeBS), a national scheme by which we are able to track trends in the populations of wetland bird species using the Severn Estuary.

Length Report 10

Full representations

Representation number:	<i>MCA / ABD Stretch/ R/7/ ABD1899</i>
Organisation/ person making representation:	<i>Environment Agency</i>
Route section(s) specific to this representation:	<i>ABD-10-S001 to ABD-10-S014</i>
Other reports within stretch to which this representation also relates:	<i>ABD1, ABD2, ABD4, ABD6, ABD7</i>
Representation in full	
<p>The Environment Agency was established in 1996 to protect and improve the environment. We have an operational responsibility for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea, as well as being a coastal erosion risk management authority. Additionally, we have a statutory duty under the Water Resources Act 1991 and the Environmental Permitting Regulations (England and Wales) 2016 to assess and review any works done within 8 metres of fluvial main river and 16 metres of tidal defence.</p> <p>Whilst, we have no “in principle” objections to the proposals subject to the comments outlined in this response, we will need to assess the acceptability of any detailed matters through the Flood Risk Activity Permit (FRAP) process detailed below.</p> <p>Flood Risk Activity Permit</p> <p>The proposals may require a permit under the Environmental Permitting (England and Wales) Regulations 2010 from the Environment Agency for any proposed works or structures, in, under, over or within sixteen metres of the top of the bank of the Severn Estuary, designated a ‘main river’. An Environmental Permit may also be required for any works on, or within sixteen metres of the landward toe of any Environment Agency designated flood defence structure(s). It is common in larger river systems, or tidal areas, for Environment Agency flood defences to be located in excess of 8 metres from the main channel or coastline, and greater than 20 metres in some instances. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt.</p> <p>A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits. To discuss the scope of the controls please contact the Environment Agency on 03708 506 506 or email: bridgwater.frap@environment-agency.gov.uk .</p> <p>To find the location of Environment Agency flood defence structure and main rivers, together with further information, please refer to our Flood Maps on gov.uk. We would</p>	

like to agree the location of any signage and new gates you intend to install, which could be done through the Flood Risk Activity Permit process discussed above.

It must be noted that any works in proximity of a watercourse other than a main river, may be subject to the regulatory requirements of the Lead Local Flood Authority/Internal Drainage Board (e.g. Lower Severn Internal Drainage Board).

Flood Risk considerations

With regards to the specific sections of the coastal path, we offer the following comments. We ask that any detailed proposals fully address the points raised, to ensure the integrity of coastal defences is not adversely impacted by the coastal path, in the interest of flood risk management.

[At this point in the representation there are a number of detailed comments relating to other reports within the Aust to Brean stretch. These are set out in full in Natural England's comments on representations about the report to which they relate. Here we reproduce only those comments that are relevant to the Secretary of State's consideration of report ABD10.]

ABD 10 Brean Cross Sluice to Brean Down Fort

The Path is along the top of the River Axe tidal defences. These are required for flood defence purposes and must not be damaged. We also need to maintain these banks and drive vehicles along them. Any works would require a FRAP.

Fisheries, Biodiversity and Geomorphology

We note within the Aust to Brean Down Habitats Regulations "table 30 other live plans or projects", the Avonmouth Severnside Enterprise Area (ASEA) Ecology and Mitigation Flood Defence Scheme and the Environment Agency's flood defence maintenance programmes are included.

We note that assent from Natural England for the flood defence maintenance programme and Habitats Regulations Assessment (HRA) is renewed on an annual basis. We are seeking a 3 year agreement next year, so it is hoped assent will be sought on a 3 yearly basis in future (for the Bristol Avon catchment). We note we will have to assess in subsequent years how any residual effects from the programme work could interact with residual effects from the Coast Path.

Although identified as having insignificant and combinable effects, the maintenance programme is not included in Table 31 'Risk of in-combination effects' within the Aust to Brean Down HRA, it is unclear whilst this is the case?

Please note in 2019 we received assent for North Somerset maintenance work between the period 2019 - 2021, so any in combination effects between the maintenance plan and coastal path would need to be considered when assent is reapplied for in 2022.

Groundwater and Contaminated Land

We understand that the trail will predominantly utilise existing infrastructure and there is therefore little likelihood of ground disturbance during construction that may encounter contamination or pose a risk to groundwater.

Should ground disturbance be required, the applicant should make appropriate consideration of potential contamination and follow the guidance 'Land Contamination: Risk Management found at <https://www.gov.uk/government/collections/land-contamination-technical-guidance> for managing the risks.

Next steps

We ask that any further correspondence/queries regarding the Coastal Access Report, are directed to the Wessex Sustainable Places team using the contact details below. We are principal Environment Agency point of contact.

Natural England's comments

The representation relates to all the proposals between Aust and Brean Down. Our comments below explain how we think it should be understood in that wider context and, where relevant, in relation to the specific proposals in report ABD10.

Natural England has worked closely with the Environment Agency throughout the development of the coastal access proposals for Aust to Brean Down. We thank them for their cooperation and advice to date and for the detailed comments in the representation. We welcome confirmation that the Agency has no 'in principle' objections to the proposed access arrangements and look forward to continued close cooperation during the establishment phase of the coast path project, should the Secretary of State approve a route.

We have a good understanding of the Agency's operational requirements at specific locations including the tidal reaches of the River Axe in this report. Our existing Agency contacts have made us aware of the requirement for to obtain a Flood Risk Activity Permit (FRAP) in relation to some works along the route prior to establishment. From our discussions to date, we anticipate that the Agency will permit all necessary works envisaged to establish the route between Brean Down Sluice and Brean Down Fort and expect that the Agency may place specific conditions on, for example, the timing or detailed specification of some works in order to ensure compliance with flood risk management. Somerset County Council, the local access authority which will undertake the necessary works, is aware of the FRAP requirement and will acquire the necessary permits before any works commence.

Sections ABD-10-S001 to ABD-10-S014 of the proposed route is on top of Brean Down Sluice and the adjoining tidal bank. As noted on report maps ABD 10a to 10c and table 10.3.1 of report ABD6, there are existing access rights to section ABD-10-S001 (the sluice) and ABD-10-S009 to S014, but no general public access to the intervening length of tidal bank. We note the primary flood defence function of both the sluice and the bank and

the ongoing requirement for vehicles to pass along them for the purposes of maintenance and repair.

In our discussions with the Environment Agency we have explained what new and replacement infrastructure is likely to be necessary to facilitate pedestrian access along the bank and envisage that the FRAP process will confirm that this can be realised without compromise to the flood defence structures, their repair or maintenance.

In respect of our Habitats Regulations Assessment (HRA), we have clarified with the Agency that its flood maintenance programme is listed among the considerations on row 2, page 142 in table 31 of the HRA. The Environment Agency have since confirmed that they agree this to be the case.

We thank the Agency for clarifying its intention to consider any in combination effects between the maintenance programme and the coast path as part of its application to Natural England for assent in 2022.

We note the need to consider land contamination risk with respect to any ground disturbance necessary to establish the route. We thank the Agency for supplying the link to the current guidance, which we will pass on to the local access authority coordinating path establishment.

We note the requirement to direct any future queries through the Wessex Sustainable Places team and confirm to the Secretary of State that this new point of contact is now established.

Other representations

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:
<i>MCA/ABD Stretch/R/1/ABD1840</i>	<i>[Redacted]</i>
<i>MCA/ABD Overview/R/2/ABD1842</i>	<i>[Redacted]</i>
Name of site:	<i>Aust to Brean</i>
Report map reference:	-
Route sections on or adjacent to the land:	-

Other reports within stretch to which this representation also relates	<i>All reports between Aust and Brean Down</i>
<p>Summary of point:</p> <p>[Redacted] is a resident of North Somerset and Ward Councillor for Banwell and Winscombe, a short distance from the coast at Weston-super-Mare. [Redacted] is a local resident and walker.</p> <p>Both representations express support and enthusiasm for the coastal access proposals from Aust to Brean as a whole.</p> <p>[Redacted] is anticipates that the path will promote tourism, sustainable travel and a more active lifestyle. [Redacted] points out that that sustainable travel should play a major part in finding solutions to the climate crisis declared by North Somerset Council and believes that the coast path can contribute to sustainable travel because it links several coastal towns and so may be used by commuters.</p> <p>[Redacted] looks forward in particular to walking a path along Woodspring Bay, part of the coast covered in report ABD6 where there is no existing path.</p>	
<p>Natural England's comment:</p> <p>We thank [redacted] and [redacted] for their enthusiastic responses to the coastal access proposals. We draw the Secretary of State's attention to the anticipated benefits of our coastal access proposals both with respect to sustainable travel and public enjoyment.</p>	

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:
<i>MCA/ ABD10/ R/1/ ABD1843</i>	<i>The Disabled Ramblers</i>
<i>MCA/ ABD10/ R/2/ ABD1843</i>	<i>The Disabled Ramblers</i>
<i>MCA / ABD10/ R/3/ ABD1662</i>	<i>North Somerset Local Access Forum</i>
Name of site:	<i>Brean Cross Sluice to Brean Down Fort</i>
Report map reference:	<i>ABD 1a to ABD 1d</i>
Route sections on or adjacent to the land:	<i>ABD-10-S001 to ABD-10-S019</i>
Other reports within stretch to which this representation also relates	-

Summary of points:

Both the Disabled Ramblers and the North Somerset Local Access Forum urge Natural England to take fuller account of the needs of mobility scooter users. Both point out (the Disabled Ramblers with reference to photographic evidence included in section 5) the inherent suitability of the proposed route between Brean Cross Sluice and Brean Down Fort for mobility scooters.

The Disabled Ramblers requests that Natural England should take all reasonable steps to make the trail as easy as possible for disabled people and those with reduced mobility, be mindful of British Standard BS5709: 2018 Gaps Gates and Stiles, and reconsider the suitability of existing infrastructure that it has indicated should be retained because in many cases this bars legitimate access by mobility scooters. The Local Access Forum asks Natural England to review access to the military road on Brean Down which forms sections ABD-10-S017 to ABD-10-S019 of the proposed route, with a view to improving access for mobility scooters.

Both representations include detailed observations to explain why certain existing access infrastructure along the proposed route present barriers to mobility scooter users. They make the following specific recommendations to allow access by an individual with reduced mobility who is on their own, on their mobility scooter, and who wishes to have access at the same times of day that is afforded to walkers:

- The existing field gates on route sections ABD-10-S002 to ABD-10-S014 should be changed to allow mobility scooter access;
- The route should be aligned obliquely where it ascends or descends the flood defence bank (at the junction of route sections ABD-10-S014 and ABD-10-S015);
- The recently installed pedestrian gate at the junction of sections ABD-10-S015 and ABD-10-S016 should be adjusted to make it easier to open by a person using a mobility scooter;
- A different barrier arrangement at the junction of route sections ABD-10-S016 and ABD-10-S017, because the current 'radar' padlock arrangement, as shown in the photograph in section 5, cannot be reached by a person sitting on a mobility scooter or operated by someone with only one head;
- A different arrangement for mobility scooters to reach Brean Down Fort from the far end of route section ABD-10-S019, for the same reasons.

The Disabled Ramblers undertakes to submit further recommendations to Natural England separately to be considered as part of the establishment works, which Natural England has since received.

The North Somerset Local Access Forum is not the local access forum for the area in which the affected land is situated and its representation about this report has therefore been treated as one of the other representations which in accordance with the legislation are to be summarised.

Natural England's comment:

We thank the Disabled Ramblers and the North Somerset Local Access Forum for their representations and in particular welcome the timely focus on adjustments for mobility scooter users.

The suggestions made by them concern the choice and design of existing and new structures along the proposed routes, should it be approved by the Secretary of State: they do not imply any modification of the proposed routes or the extent of the associated margin and the access rights within it.

We recognise that there have been recent innovations in the design of mobility scooters and that as a result mobility scooters are more versatile and in particular have much longer battery life.

We note that in finalising the schedule and specification of establishment works for any route approved by the Secretary of State, both Natural England and Somerset County Council, the local access authority which will undertake the works, should take all reasonable steps needed to make the trail as easy as possible for disabled people and those with reduced mobility, having regard to British Standard BS5709: 2018 Gaps Gates and Stiles.

Since receiving these representations, we have further and more detailed suggestions from the Disabled Ramblers as to how best to fulfil this aspiration for the proposed route between Brean Cross Sluice and Brean Down Fort. We shared all these suggestions with Somerset County Council.

Natural England and Somerset County Council share the ambition to make the coast path from Brean Cross Sluice to Brean Down Fort accessible to mobility scooter users and in principle agree to the suggestions made to achieve this. This is subject to practical considerations which may be raised by other interests in the land, including any requirements of the Flood Risk Activity Permit issued by the Environment Agency and the agreement of other affected land owners, which must be sought before any works are undertaken.

Relevant appended documents (see Section 5):

From the Disabled Ramblers representation *MCA/ABD10/R/1/ABD1843*:

- Photographs illustrating use of mobility vehicle on uneven grass paths

From the Disabled Ramblers representation *MCA/ABD10/R/2/ABD1843*:

- Photograph of padlock on field gate at junction of route sections ABD-10-S016 and ABD-1-S017.

From the North Somerset Local Access Forum representation *MCA / ABD10/ R/3/ ABD1662*:

- General comments on accessibility for those with limited mobility 17.9.19.

Representation ID:	<i>MCA/ ABD10/ R/3/ ABD1662</i>
Organisation/ person making representation:	<i>North Somerset Local Access Forum</i>
Name of site:	<i>Brean Cross Sluice to Brean Down Fort</i>
Report map reference:	-
Route sections on or adjacent to the land:	-
Other reports within stretch to which this representation also relates	<i>All reports between Aust and Brean Down</i>

Summary of representation:

The Forum makes two points about access along the path for people with reduced mobility which are summarised in section 4 alongside similar points made by the Disabled Ramblers. It also makes the following two general points:

- Whilst specific restrictions on dogs are in place for certain sections of the ECP, there should be an expectation that dogs should be kept under close control at all times
- On-site signage and interpretation should only be used after very careful consideration of need and appropriateness to the location. Waymarks should only be used where the route is not abundantly clear and/or where a potential safety hazard may be encountered.

The North Somerset Local Access Forum is not the local access forum for the area in which the affected land is situated and its representation about this report has therefore been treated as one of the other representations which in accordance with the legislation are to be summarised.

Natural England's comment:

Our approach to access by people with dogs is underpinned by the coastal access legislation, the principle of the 'least restrictive option' set out in section 6.3 of the

[Coastal Access Scheme](#), and the specific interpretation of that principle at paragraphs 6.7.7 to 6.7.9 of the Scheme.

The default position on the England Coast Path is that people must keep dogs under effective control, although the precise legal requirement may be different where there are pre-existing access rights.

Access legislation defines effective control as meaning that the dog must either be:

- on a lead or:
- within sight of the person and the person remains aware of the dog's actions and has reason to be confident that the dog will return to the person reliably and promptly on the person's command.

It further requires that dogs must be on a lead at all times in the vicinity of livestock.

(See paragraph 6A of [Schedule 2 to the Countryside and Rights of Way Act 2000](#), as amended for the purposes of the coastal margin).

We think that effective control is a clearer and more easily understood expectation than the words 'close control', which are not further defined in law.

We know that many people seek opportunities to exercise their dogs off lead and there are many places at the coast where they may reasonably expect to do so. For these reasons we say that effective control is also a more appropriate general expectation than close control, provided people understand and can comply with its specific requirements.

We support the use of further local restrictions provided, in accordance with the least restrictive principle, there is a proven need and the restriction used is proportionate to that need. For example in report ABD6, we have proposed that dogs must be on leads at all times in several places in order to minimise disturbance to roosting and feeding waterbirds.

We intend to install signs at various locations along the River Axe asking people to keep to the path and to make sure their dog stays on the path too, using a lead if the dog cannot otherwise be relied upon to do so. This is necessary as part of our efforts to ensure that there is no overall increase in disturbance to roosting and feeding waterbirds on the estuary.

We agree with the Local Access Forum that waymarks, signs and interpretation should be used sparingly and after consideration of the need and suitability to the location. Specific signs and interpretation are in our view necessary and appropriate on this part of the coast path, in particular to explain the proposed seasonal exclusion of access on route sections ABD-10-S003 to ABD-10-S008 and the operation of an alternative route. Small waymark discs are also in our view a helpful and unobtrusive means to signal the route and give walkers the clarity and confidence to follow the route.

Representation number:	<i>MCA / ABD Stretch/ R/9/ ABD1911</i>
Organisation/ person making representation:	<i>Wildfowl and Wetlands Trust (WWT)</i>
Name of site:	<i>Aust to Brean (whole stretch)</i>
Report map reference:	-
Route sections on or adjacent to the land:	-
Other reports within stretch to which this representation also relates:	<i>All reports within stretch</i>
Summary of representation:	
<p>The Wildfowl & Wetlands Trust (WWT) is the UK's leading wetland conservation charity, with a vision of a world where healthy wetland nature thrives and enriches lives. It works across the UK and internationally to conserve, restore and create wetlands, save wetland wildlife, and inspire people to value the amazing things healthy wetlands achieve for people and nature.</p> <p>The Aust to Brean Down section of England's coastal path is located along a stretch of the Severn Estuary in between two of WWT's sites, Slimbridge to the north and Steart Marshes to the south. The Trust welcomes the addition of coastal access for visitors and residents, and hopes this will encourage people to explore the wonderful Severn estuary and its wildlife. It supports the development of signage to encourage interest in the waterbirds and wildlife using the estuary.</p> <p>It welcomes the mitigation measures that have been identified in the Habitats Risk Assessment and Nature Conservation Assessment to reduce the impact on waterbirds and estuarine habitats. It has worked on similar mitigation measures elsewhere in the Severn estuary. It has concerns about relying on adoption of behavioural change outlined on signs to mitigate disturbance, as it is unrealistic to expect that everyone will read and adopt required behaviour displayed on signs.</p> <p>In order to encourage adoption of behaviour displayed on signs, it suggests that further engagement of the local community may be useful in installing signs and encourage individuals to help warden the area independently.</p> <p>It encourages further consideration of the need for additional physical measures, such as screens and netting, to prevent people and dogs leaving the path in highly sensitive areas. It says stock netting in areas where people frequently let dogs off leads regardless of signs has proved effective at preventing dogs accessing sensitive areas without compromising visual aesthetics. With regards to seasonal access, it believes it is important that information on when routes are open and shut is made very clear and easy to read. It says that locked gates during the closed period also aids in controlling access.</p>	

It suggests follow-up work to check if the mitigation is effective.

Natural England's comments

We welcome the Wildlife and Wetlands Trust representation and for their support for the overall objective of a continuous route along the lower Severn estuary, the measures we propose to avoid mitigate potential disturbance of waterbirds and the use of branded signs to stimulate public interest in waterbirds.

The representation relates to all the proposals between Aust and Brean Down. Our comments below explain how we think it should be understood in that wider context and, where relevant, in relation to the specific proposals in report ABD10.

Our overall approach to disturbance and mitigation is set out in our published [Habitats Regulations Assessment](#), including the simple set of behavioural messages that we propose to promote to walkers along the estuary.

We agree that it is not realistic to expect everyone to read signs or adhere to behavioural messages and the signs we propose are backed up in some places with additional measures. In [report ABD10](#) we propose a path closure along the River Axe during periods when waterbirds are present in significant numbers and provision of an alternative route when the closure is in force. We refer the Secretary of State to table 10.2.9 on page 3 of the report for further details, including dates of operation, local publicity and physical measures to discourage trespass along the riverbank when the path is closed.

We agree that fencing can be a useful way to avoid disturbance to waterbirds and this is an option we propose to use in some places, in particular where new sections of path are proposed and walkers or their dogs might otherwise stray off the path into a sensitive area. For example, the seasonal route arrangements in this report include a new wing fence with stock netting and a lockable gate at the old ferry point on map 10b. These and other measures are explained on page 3 of the report.

We agree with WWT that face-to-face engagement with the local community may be a useful way to help new access arrangements to bed in and we have already begun discussions with two local partner organisations who are interested in doing so.

Overall we are confident in our conclusions that the suite of mitigation measures we propose in the report will give the required level protection. We note WWT's suggestion to check that it operates as expected. There are two arrangements in place that will help with this: first, the requirement for local access authorities to report to Natural England on the condition of the path and associated infrastructure, in order to qualify for central government contribution towards maintenance costs. The second is the ongoing Wetland Birds Survey (WeBS), a national scheme by which we are able to track trends in the populations of wetland bird species using the Severn Estuary.

5. Supporting documents

Length 2

MCA/ ABD2/ R/1/ ABD1843: The Disabled Ramblers

Photograph illustrating use of mobility vehicle on uneven grass path.

This photograph has been redacted due to containing personal information

Photographs of kissing gates at pedestrian railway crossing (route sections ABD-2-S018 and ABD-2-S020): these are barriers to access by mobility scooter users.



MCA/ ABD2/ R/3/ ABD1843: The Disabled Ramblers

Photograph of access point A

The barriers to the side of the vehicle gate are locked and so arranged that it is not possible to get past them with a mobility vehicle.



Photograph of access point B (left)

The gaps to either side of the vehicle gate are too narrow to afford access on a mobility scooter.

Photograph of access point C (right)

A gate with narrow pedestrian gap (not shown) prevents use of this entry point to mobility scooters



Photograph of cycle chicane at junction of ABD-2-S007 and ABD-2-S008 *This chicane prevents onward access by people using mobility vehicles.*



MCA/ ABD2/ R/3/ ABD1843: The Disabled Ramblers

Photographs of the proposed route between route section ABD-2-S009 and ABD-2-S012



MCA / ABD1/ R/5/ ABD1662: North Somerset Local Access Forum

General Comments on Accessibility for those with Limited Mobility

Many people with reduced mobility like to get off tarmac onto natural surfaces and out to wilder areas whenever they can. At one extreme, a determined pusher of a manual wheelchair can enable access to a disabled person across grass and up steep hills. At the other, off-road mobility scooter riders can manage rough terrain, significant slopes, cross water up to 8" deep and, depending on battery type and terrain, they can easily run 8 miles in one charge.

A significant part of the proposed ECP is along seawalls, sea banks and flood banks. Seawalls are often very suitable for off-road mobility scooters and some other mobility vehicles. They afford an opportunity for the rider to get off tarmac, to access wilder terrain, enjoy great views, and experience the local wildlife.

All furniture should be designed for ease of use by those with limited mobility.

Existing barriers to access for off-road mobility scooters should be removed wherever possible. If this is not possible then a nearby alternative route should be sought. There are often diversions that pavement scooters could take to bypass stretches of the ECP that are not suitable for them. There should be an assumption that a person with reduced mobility will be unaccompanied and will need to be able to operate the structure on their own, seated on their mobility vehicle. In the urban environment it is important there are enough wellplaced dropped kerbs to enable easy progress along the route for and to allow those with limited mobility to access nearby facilities.

If a pavement scooter can manage the terrain and the gates/barriers, it is likely that manual chairs can too. Pavement scooters often have lower clearance, are longer and do not fit through most kissing gates that are suitable for pushchairs and wheelchairs. Pavement scooters are widely used over longer distances in preference to manual wheelchairs.

When considering suitability of man-made structures along the route we ask that British Standard 5709:2018 Gaps, Gates & Stiles be taken in to account. The Standard updates the previous BS version in view of recent thinking and legislation to focus on the needs for less able-bodied and disabled people to be able to access the countryside.

Length 4

MCA/ ABD4/ R/1/ ABD1843: The Disabled Ramblers

Photographs illustrating use of mobility vehicles on uneven and wet terrain.

These photographs have been redacted due to containing personal information.
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MCA / ABD4/ R/5/ ABD1662: North Somerset Local Access Forum

General Comments on Accessibility for those with Limited Mobility

Many people with reduced mobility like to get off tarmac onto natural surfaces and out to wilder areas whenever they can. At one extreme, a determined pusher of a manual wheelchair can enable access to a disabled person across grass and up steep hills. At the other, off-road mobility scooter riders can manage rough terrain, significant slopes, cross water up to 8" deep and, depending on battery type and terrain, they can easily run 8 miles in one charge.

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If a pavement scooter can manage the terrain and the gates/barriers, it is likely that manual chairs can too. Pavement scooters often have lower clearance, are longer and do not fit through most kissing gates that are suitable for pushchairs and wheelchairs. Pavement scooters are widely used over longer distances in preference to manual wheelchairs.

When considering suitability of man-made structures along the route we ask that British Standard 5709:2018 Gaps, Gates & Stiles be taken in to account. The Standard updates the previous BS version in view of recent thinking and legislation to focus on the needs for less able-bodied and disabled people to be able to access the countryside.

Length 5

MCA/ ABD5/ R/2/ ABD1843: The Disabled Ramblers

Photographs illustrating use of mobility vehicles in two rural settings

These photographs have been redacted due to containing personal information.

MCA/ ABD5/ R/3/ ABD1843: The Disabled Ramblers

Photographs illustrating existing barriers for mobility scooter users to the grass area crossed by route sections ABD-5-S009 and ABD-5-S010 (map ABD 5a):

- Top left: steps at the western end of route section ABD-5-S008, preventing access to section ABD-5-S009 for some mobility scooter users
- Top right: section ABD-5-S009 of the proposed route, currently inaccessible to some mobility scooter users
- Bottom left – two views of an access point to section ABD-5-S009 from Esplanade Road



MCA / ABD5/ R/6/ ABD1662: North Somerset Local Access Forum

General Comments on Accessibility for those with Limited Mobility

Many people with reduced mobility like to get off tarmac onto natural surfaces and out to wilder areas whenever they can. At one extreme, a determined pusher of a manual wheelchair can enable access to a disabled person across grass and up steep hills. At the other, off-road mobility scooter riders can manage rough terrain, significant slopes, cross water up to 8" deep and, depending on battery type and terrain, they can easily run 8 miles in one charge.

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All furniture should be designed for ease of use by those with limited mobility.

Existing barriers to access for off-road mobility scooters should be removed wherever possible. If this is not possible then a nearby alternative route should be sought. There are often diversions that pavement scooters could take to bypass stretches of the ECP that are not suitable for them. There should be an assumption that a person with reduced mobility will be unaccompanied and will need to be able to operate the structure on their own, seated on their mobility vehicle. In the urban environment it is important there are enough wellplaced dropped kerbs to enable easy progress along the route for and to allow those with limited mobility to access nearby facilities.

If a pavement scooter can manage the terrain and the gates/barriers, it is likely that manual chairs can too. Pavement scooters often have lower clearance, are longer and do not fit through most kissing gates that are suitable for pushchairs and wheelchairs. Pavement scooters are widely used over longer distances in preference to manual wheelchairs.

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Length 7

MCA / ABD7/ R/5/ ABD1662: North Somerset Local Access Forum

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MCA/ABD7/R/1/ABD1843: The Disabled Ramblers
Photographs illustrating use of mobility scooters on uneven terrain



This photograph has been redacted due to containing personal information

MCA/ABD7/R/2/ABD1843: The Disabled Ramblers

Photographs of steps at Huckers Bow, which are a barrier to mobility scooter users



MCA/ABD7/R/2/ABD1843: The Disabled Ramblers

Proposed modification to the route at Huckers Bow Sluice from the Disabled Ramblers (route sections ABD-6-S060 and ABD-7-S001)

1. Drop down the track to the car park, using the outside of the bend which is otherwise quite steep.



2. Cross the car park aiming for the concrete pathway over the sluice (as indicated by the orange arrow).



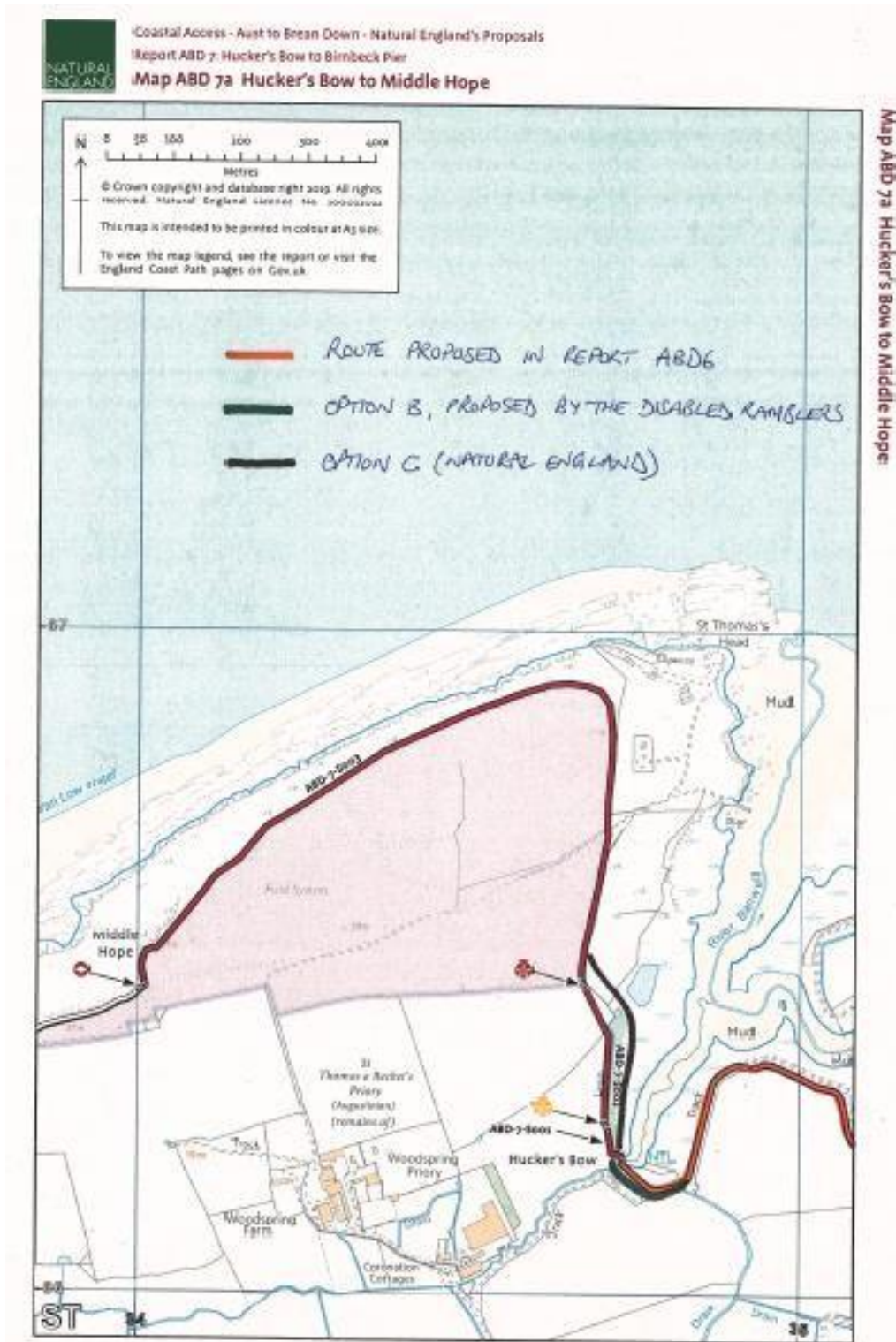
3. The turns in the existing pathway over the sluice walls are too tight for mobility scooters (top), but with removal of the temporary fencing/gates scooters could cross more directly, as indicated by the blue and orange arrows (bottom).



Report map ABD 7a (hand annotated version): Natural England

Hand annotated map to illustrate two options for mobility scooter access at Huckers Bow Sluice:

- Option B – proposed by the Disabled Ramblers (see photographs on pages 8-19 above)
- Option C – as suggested in our comments on page 11



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MCA/ABD7/R/3/ABD1843: The Disabled Ramblers

Photograph of gate adjacent to route section ABD-7-S005 which is unsuitable for mobility scooter access (at grid reference ST32914 66100)



MCA / ABD8/ R/2/ ABD1662: North Somerset Local Access Forum

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MCA/ABD8/R/1/ABD1843: The Disabled Ramblers

Photograph illustrating mobility scooters enjoying a beach.



Length 9

MCA / ABD8/ R/2/ ABD1662: North Somerset Local Access Forum

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MCA/ABD9/R/1/ABD1843: The Disabled Ramblers

Photograph illustrating use of mobility vehicle on uneven grass path

This photograph has been redacted due to containing personal information

Photograph illustrating use of mobility vehicle on a beach



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MCA/ABD9/R/2/ABD1843: The Disabled Ramblers

Photographs of steps and gate at route sections ABD-9-S022 and ABD-9-S023, which impede mobility scooter users



Photograph illustrating how mobility scooter users could avoid the steps at route section ABD-9S022



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Length 10

MCA/ ABD10/ R/1/ ABD1843: The Disabled Ramblers

Photographs illustrating use of mobility vehicles on uneven grass paths.

These photographs
have been redacted
due to containing
personal information

MCA/ ABD10/ R/2/ ABD1843: The Disabled Ramblers

Photograph of padlock on field gate at junction of route sections ABD-10-S016 and ABD-1S017.



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