

# Coastal Access – Marsland Mouth to Newquay lengths MNQ1, MNQ3 to MNQ5 and MNQ7 to MNQ11



## 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 MNQ1, MNQ3 to MNQ5 and MNQ7 to MNQ11 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 Marsland Mouth to Newquay they are included here in so far as they are relevant to lengths MNQ1, MNQ3 to MNQ5 and MNQ7 to MNQ11 only.

## **2. Background**

Natural England's compendium of reports setting out its proposals for improved access to the coast from Marsland Mouth to Newquay, comprising an overview and eleven separate length reports, was submitted to the Secretary of State on 9 October 2019. This began an eight-week period during which representations and objections about each constituent report could be made.

In total, Natural England received 55 representations pertaining to length reports MNQ1, MNQ3 to MNQ5 and MNQ7 to MNQ11, of which 39 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 16 representations made by other individuals or organisations, referred to as 'other' representations. Section 5 contains the supporting documents referenced against the representations.

## **3. Layout**

The representations and Natural England's comments on them are separated below into the lengths against which they were submitted. Each length below contains the 'full' and 'other' representations submitted against it, together with Natural England's comments. Where representations refer to two or more lengths, they and Natural England's comments will appear in duplicate under each relevant length. Note that although a representation may appear within multiple lengths, Natural England's responses may include length-specific comments which are not duplicated across all lengths in which the representation appears. 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 1

#### *Full representations*

<b>Representation number:</b>	MCA/stretch/R/2/MNQ1033
<b>Organisation/ person making representation:</b>	Environment Agency
<b>Route section(s) specific to this representation:</b>	Whole stretch
<b>Other reports within stretch to which this representation also relates:</b>	MNQ1 - MNQ11
<b>Representation in full</b> Please can we make the below general comments: <ol style="list-style-type: none"> <li>1. We would like to highlight that works within 16m of a Main River or a flood defence may require an Environmental Permit for Flood Risk Activities.</li> <li>2. The proposals are broadly supported by the Cornwall and Isles of Scilly Shoreline Management Plan (2011) which includes maintaining a continuous coastal route and improved coastal access as core management objectives. At the moment we are seeing quite unprecedented impacts on the coast path in Cornwall, due partly to on-going erosion by waves and high tides of course, but also it's highly likely that the prolonged rainfall we've had (following a hot, dry summer), is causing destabilisation, land slips and cliff falls along some of the softer geology frontages. Added to these factors, (and especially along the more urbanised frontages such as Newquay), development pressure close to the cliff edge also poses a risk to the long-term sustainability of the route.</li> </ol>	
<b>Natural England's comments</b> We welcome the positive engagement from the Environment Agency during the development of our proposals. Within the Marsland Mouth to Newquay Coastal Access proposals there are no works within 16m of a main river or a flood defence. The rollback proposals outlined in the MNQ1 report, tables 1.3.1 and 1.3.3, will enable the coast path to be adjusted more easily where it is affected by weather and wave action.	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/MNQ1/R/2/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	Map MNQ1b; route sections MNQ-1-S022 and MNQ-1-S023, Tidna Shute
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	

The coast path has recently been moved a little further inland because of cliff fall but the original route, now unstable, is shown on the proposal map.

The newly erected kissing gate has a clear opening of only 600mm, considerably less than the 1000mm required to comply with BS5709, and is not acceptable on the ECP. Many users of the Coast Path carry a large rucksack and a kissing gate with a sub-standard width is often more difficult to use than a stile.

### Natural England's comments

The first point is a reference to section MNQ-1-S023 of the proposed route shown on map MNQ1b. We agree it is shown incorrectly on the report map and our proposals are intended to follow the currently walked line of the South West Coast Path which, after a recent realignment, is now slightly further inland. We have amended our dataset to correct this mapping error and a revised map is shown as document A in section 5 below. At the small scale of the report map it is difficult to see the revision. We ask that the Secretary of State notes this mapping error and approves the proposals in the report with the correction shown on the revised map MNQ1b in section 5 below. We have shown the revised map to the land owner who has confirmed they are content for us to propose this minor clarification.

Regarding the comment in the representation about the kissing gate: first, as a general principle any new access furniture detailed in the Marsland Mouth to Newquay Coastal Access reports will be installed in compliance with BS 5709:2018, the British Standard for Gaps, Gates and Stiles. We agree that the gate does not meet that standard but have not included it in the England Coast Path establishment works. There are two reasons for this: firstly, the existing gate is not due for replacement and we would say the time to upgrade it to a gate of more suitable design is when it has reached the end of its useful life; secondly, because a separate central government contribution is made annually to the South West Coast Path National Trail Partnership to help with such costs if the Access Authority agrees they are necessary. The comments from the representation have therefore been passed to the Access Authority for their consideration.

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

- **Document A:** MCA/MNQ1/R/2/MNQ0975: Revised map MNQ1b

<b>Representation number:</b>	MCA/MNQ1/R/3/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	Map MNQ1c; MNQ-1-S026, OS grid ref SS199144 above Greenway Beach
<b>Other reports within stretch to which this representation also relates:</b>	N/A

### Representation in full

The route shown following the promontory is unstable and was roped off in 2017. A more direct route over a length of about 40m avoiding the promontory is required.

### Natural England's comments

We agree that the mapped route shown on map MNQ1c (route section MNQ-1-SO26) is incorrect and doesn't take into account the previously realigned path slightly inland which has been the currently walked route of the South West Coast Path (SWCP) for the last 3 years. Our proposals are to follow the SWCP along this section of coast. We have amended our dataset to correct this mapping error and a revised map is shown as document B in section 5 below. At the small scale of the report map it is difficult to see the revision. We ask that the Secretary of State notes this mapping error and approves the proposals in the report with the route clarification shown on the revised map MNQ1c in section 5 below.

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

- **Document B:** MCA/MNQ1/R/3/MNQ0975: Revised map MNQ1c

<b>Representation number:</b>	MCA/MNQ1/R/4/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	Map MNQ1b; MNQ-1-S020 to MNQ-1-S023, Morwenstow
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
We welcome the designation of coastal margin landward of the path, which will enhance the enjoyment of the coastal environment, particularly for those taking the coast at a leisurely pace. This is of particular value in an area designated Area of Outstanding Natural Beauty and Heritage Coast.	
<b>Natural England's comments</b>	
We welcome the positive engagement from Ramblers' Association, Cornwall during the development of our proposals and the supportive comment expressed in its representation. We have no further comment about this representation.	
<b>Relevant appended documents:</b> N/A	

***Other representations***

<b>Representation ID:</b>	MCA/MNQ1/R/1/MNQ1005
<b>Organisation/ person making representation:</b>	Morwenstow Parish Council
<b>Name of site:</b>	Marsland Mouth to Duckpool
<b>Report map reference:</b>	Maps MNQ1a-MNQ1d
<b>Route sections on or adjacent to the land:</b>	Various
<b>Other reports within stretch to which this representation also relates</b>	N/A

**Summary of representation:**

1. Two path realignments have occurred over recent years due to cliff falls; these realignments are not shown on the MNQ report maps.
2. The alternative new path at Marsland Cliffs (MNQ1a) is not deemed necessary; cutting of a few steps in the steeper parts of the existing path would suffice, the cliff slumping is very historic.
3. Other areas deemed at greater risk are North of St. Morwenna's Well (MNQ1b) and the other between Higher Sharpnose and Greenway Beach (MNQ1c), neither of which are addressed in the report.

There is a surface water problem between the County boundary at Marsland Mouth (MNQ1a) to just beyond the first bend on the track turning uphill. Because of this, walkers have developed another path across the grass area inland. We do, however, appreciate your plans for other drainage work and also the provision of new steps on difficult slopes.

4. 5. We would question why there is a section of SWCP from Greenway Beach to Stanbury Mouth (MNQ1c) with no adjacent designated public access or coastal access?

**Natural England's comment:**

1. The two path realignments referred to in the representation are the same as those referenced in the Ramblers' Association representations above (map MNQ1b - route section MNQ-1-SO23 and map MNQ1c - route section MNQ-1-SO26) and we refer the Secretary of State to our comments there.
2. A geological specialist from the Access Authority has recently reported that the current path at Marsland Cliffs would be compromised if the sections of cliff were to continue to fail, implying a significant risk to users. For this reason they have recommended the path is realigned slightly inland and this is shown in our proposals on map MNQ1a (route sections MNQ-1-S004 and MNQ-1-S005).
3. We have confirmation that all the areas suggested at risk in the representation have been recently inspected by a geological specialist from the Access Authority and they did not deem them to be at imminent risk of change. Therefore it was not considered a priority to propose any realignments to the current walked route. These locations will be monitored during the annual path surveys conducted by the Access Authority and our report proposals include rollback measures in these locations.
4. The Access Authority considers that any surface water problem to the path at Marsland Mouth (route sections MNQ-1-S001 and MNQ-1-S002) is minor and seasonal and that trying to rectify the situation by importing material would require a large amount of cutting and work to the access track which would damage the maritime heath and grassland notified features of the Site of Special Scientific Interest. Therefore, we have made no proposals for path improvements to these two route sections but the situation will continue to be monitored by the Access Authority.
5. Between Greenway Beach and Stanbury Mouth all the land seaward of the trail becomes coastal margin by default and is not therefore shown on our proposal maps. We only propose additional margin landward of the trail when the land owner is content for us to do so, unless there are overriding reasons for doing so without agreement (see chapters 4.8.16 & 4.8.17 in the Approved Coastal Access Scheme). Unlike the majority of the ECP route shown on maps MNQ1a to MNQ1d, the section of path from Greenway Beach to Stanbury Mouth (map MNQ1c; route sections MNQ-1-S026 to MNQ-1-S030) does not have any existing access land on either side, the landowners chose not to include any additional coastal margin landward of the trail and we do not consider any overriding public benefit would be gained from proposing more landward area. Our proposals are therefore correctly shown on the report maps.

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

- **Document A:** MCA/MNQ1/R/2/MNQ0975: Revised map MNQ1b
- **Document B:** MCA/MNQ1/R/3/MNQ0975: Revised map MNQ1c

# Length Report 3

## *Full representations*

<b>Representation number:</b>	MCA/MNQ3/R/1/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum
<b>Route section(s) specific to this representation:</b>	Map MNQ3a; MNQ-3-S002 to MNQ-3-S004 inclusive
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Penhalt Cliffs: The current route at Penhalt Cliff uses a narrow, steep and winding road used by tourist traffic in summer. This is unsuitable for environmental and safety reasons. It is proposed to move the path off the road, seaward for most of the length and landward for the remainder. This is a muchneeded and welcome proposal which is strongly supported.	
<b>Natural England's comments</b>	
We welcome the positive engagement from the Cornwall Countryside Access Forum during the development of our proposals and the supportive comment in its representation. We have no further comments about the representation.	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/MNQ3/R/2/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum
<b>Route section(s) specific to this representation:</b>	Map MNQ3a; MNQ-3-S009
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Bridwill Point: The path here is steep and eroded and cliff slippage is appearing nearby. It is proposed to realign the route slightly to avoid areas of slippage and to improve the surfacing. These improvement proposals are supported.	
<b>Natural England's comments</b>	
We welcome the positive engagement from the Cornwall Countryside Access Forum during the development of our proposals and the supportive comment in its representation. We have no further comments about the representation.	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/MNQ3/R/3/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum

<b>Route section(s) specific to this representation:</b>	Map MNQ3b; MNQ-3-S011
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
<p>Millook: The current route uses a road here. This is steep and winding and carries tourist traffic in summer. It is therefore not very suitable for the trail for environmental and safety reasons. It is noted that there are concerns that the ground to seaward of the road would not be suitable for the trail alignment because of its instability. An alignment landward has been dismissed because of the steep gradient. This steepness is accepted, but given that a great deal of the route dealt with under the MNQ Report is extremely steep, it is suggested that provision of a steep route here would not be unacceptable in this area. A route landward is therefore urged as a better option than use of the road.</p>	
<b>Natural England's comments</b>	
<p>We were initially hopeful that an alignment could be found to take walkers off the 320 metre section of road. However, as acknowledged in the representation and table 3.3.4 of report MNQ3, the land seaward of the road is prone to subsidence and so is unsuitable for creating a new route on. The ground landward of the road is very steep and undulating; any route across this area would introduce more ascent/descent to an already physically challenging coast path walk around Millook (see document A in section 5 below). In order to implement such a route it would be necessary to excavate a path and install hundreds of steps. Our view is that the costs of doing so outweigh the potential public benefit; it is proposed that walkers continue to follow the existing South West Coast Path along the road which gently ascends/descends the gradient. The Access Authority have confirmed that traffic on the road moves slowly because of its twisting nature and suggest there is a low risk to walkers.</p>	
<b>Relevant appended documents (see section 5):</b>	
<p>□ <b>Document A:</b> shows the contours of the ground landward of the road section MNQ-3-S011</p>	

<b>Representation number:</b>	MCA/MNQ3/R/7/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	Map MNQ3a; MNQ-3-S001 to S004
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
<p>We welcome the routing of S002 and S004 off the road, which will be safer and much more pleasant for walkers than using the road. We are disappointed at the use of the road for S003 but recognise that there may be no reasonable alternative.</p> <p>However we consider that use of the road for the full length of S001 poses a danger for walkers from vehicular traffic, is unpleasant to walk and is unnecessary. It is accepted that parts of footpath</p>	
<p>Poundstock 33 have been lost through cliff fall. However the land between the cliff and the road, other than that immediately around the building Atlantic Court, is designated Countryside and Rights of Way Act 2000 access land and the coast path could be routed across it.</p> <p>Section 3.3.4 of the Report states that this is available as spreading room, which is misleading as dense tall gorse along the roadside prevents all access, as well as limiting the view of the sea [see <i>document B in section 5 below</i>]. We do not agree with the statement in the Report that the proposed use of the road strikes 'the best balance in terms of the criteria described in chapter 4 of the Coastal Access Scheme.</p>	
<b>Natural England's comments</b>	



We investigated an off-road route on the seaward side of section MNQ-3-S003 but found the ground to be prone to subsidence and not suitable to create a new trail upon. However, along this short road section there is a wide grass verge which is currently used by walkers and provides a safe haven away from traffic.

We agree with the comment in the representation about the road section along MNQ-3-S001 being unpleasant to walk and so we explored the possibility of taking the route off the road towards the seaward cliffs. However, there were two reasons why we concluded this to be inappropriate:

- (a) the land seaward of the road, whilst designated as existing access land, is prone to subsidence and is not suitable to place a new route; the public right way in this area (see map MNQ3a in report MNQ3) has been lost due to cliff erosion;
- (b) the land seaward of the road is owned by an outdoor activity centre who cater for school groups. As outlined in section 8.19.9 of the Coastal Access Scheme: 'A few coastal sites cater for specialist groups which require a greater degree of privacy or security than normal, in particular: sites used by recognised youth organisations for organised youth camps, where children or young people may be encouraged to explore freely within the safe boundaries of such a site, knowing that any adult they encounter will be a trusted and accredited helper.' This scheme guidance is very pertinent to this situation because as can be seen in document C in section 5 below, there are various camping sites and private trails located in the area seaward of the road which is owned and used by the activity centre.

Whilst we appreciate the desire to find an off-road alternative route along MNQ-3-S001, for the reasons outlined above this was not possible. However, there is a wide grass verge adjacent to some of the road section which is currently used by walkers (see document D in section 5 below). The road is straight with good sight-lines for drivers/walkers so the Access Authority have confirmed that in their view the proposed route, following the existing South West Coast Path, doesn't pose an unacceptable risk for walkers.

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

- **Document B:** Photographs showing proposed route along MNQ-3-S001 submitted with the representation
- **Document C:** Map showing route section MNQ-3-S001
- **Document D:** Photo showing route section MNQ-3-S001

<b>Representation number:</b>	MCA/MNQ3/R/8/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	All route sections on maps MNQ3c and MNQ3d
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
We welcome the designation of a considerable area of coastal margin landward of the path giving the public the opportunity of enjoying more than just a narrow strip along the coast, which here has a designation of Heritage Coast and is situated in a wider Area of Outstanding Natural Beauty. We note that part of the designated area south of West Dizzard (grid ref SX1642 9850) appears to fall outside the extent of both maps and suggest that an inset map is required to clarify the limits of the designated area.	
<b>Natural England's comments</b>	

We welcome the positive engagement from the Ramblers' Association during the development of our proposals and the supportive comment in its representation.

As highlighted in the representation, the full extent of the boundary of the landward coastal margin (pink shading) was not shown on the report maps MNQ3c and MNQ3d. We have prepared revised maps which show its full extent and these are included in section 5 of this document. The relevant land is owned by the National Trust, which gave its agreement for it to form part of the landward coastal margin before the report was published, having consulted with the farm tenant. Accordingly we ask that the Secretary of State notes the omission in the original report. We have published a revised version of the report with the amended maps and a note to explain the amendment.

**Relevant appended documents:**

- **Document E:** Revised map MNQ3c
- **Document F:** Revised map MNQ3d

<b>Representation number:</b>	MCA/stretch/R/1/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	Map MNQ3e, section MNQ-3-S050
<b>Other reports within stretch to which this representation also relates:</b>	MNQ4, MNQ5, MNQ6, MNQ7 & MNQ9

**Representation in full**

On a National Trail, limitations such as gates and stiles should, where possible, conform to the BS5709:2018 or at least an earlier British Standard. Within the last two years, several kissing gates have been erected on the South West Coast Path, now to become the route for the England Coast Path, which fall far short of the width and other requirements of the Standard. This makes use of the path by walkers carrying large rucksacks difficult and structures should be modified or replaced so that they conform to standard where practical. BS5709 requires a clear width of at least 1.0m to be available through kissing gates. For walkers carrying large rucksacks, narrow kissing gates are often far more difficult to negotiate than stiles. Where structures are replaced, consideration should be given to the needs of those using mobility vehicles where the rest of the path would be accessible but for the structures (Equality Act 2010).

Locations are listed below. The Report shows no proposed works at these locations to mitigate the shortcomings.

1. Map MNQ3e, section MNQ-3-S050: Castle Point SX145975 new kissing gate, gap only 420mm.
2. Map MNQ4e, section MNQ-4-S077: Hillsborough SX109918 new kissing gate, gap only 450mm.
3. Map MNQ5a, section MNQ-5-S013: Forrabury Common, SX 0915 9091, staggered barrier at bottom of steps, gap only 625mm.
4. Map MNQ5c, section MNQ-5-S052: West of Bossinney Haven, SX0651 8938, squeeze stile only 350mm wide at waist height.
5. Map MNQ6d, section MNQ-6-S061/S062: Bounds Cliff, SX 0231 8125, unnecessary timber stile in tandem with good quality stone stile.
6. Map MNQ7a, section MNQ-5-S011: Varley Head, SW985813, kissing gate has gap of only 630mm.
7. Map MNQ7e, section MNQ-7-S066: South of Pentire Point, SW930801, path restricted to 610mm width by timber rails
8. Map MNQ9f, section MNQ-9-S135, Long Cove, SW860763: On the recently realigned path the new kissing gate has a gap of only 680mm.

**Natural England's comments**

We thank the Ramblers for their detailed representation, which we have passed to the access authority for consideration. Both we and the access authority agree in principle that gates should conform to the most recent British Standard and any new access furniture detailed in the Marsland Mouth to Newquay Coastal Access reports will be installed in compliance with BS 5709:2018, the British Standard for Gaps, Gates and Stiles.

In deciding what to include in the draft schedule for England Coast Path Works we took the view that replacement of small standard items such as gates and signposts on the existing coast path should not be a priority for inclusion. This is primarily because a separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with these costs if the Access Authority agrees they are necessary.

**Relevant appended documents:** N/A

<b>Representation number:</b>	MCA/stretch/R/2/MNQ1033
<b>Organisation/ person making representation:</b>	Environment Agency
<b>Route section(s) specific to this representation:</b>	Whole stretch
<b>Other reports within stretch to which this representation also relates:</b>	MNQ1 - MNQ11

**Representation in full**

Please can we make the below general comments:

1. We would like to highlight that works within 16m of a Main River or a flood defence may require an Environmental Permit for Flood Risk Activities.
2. The proposals are broadly supported by the Cornwall and Isles of Scilly Shoreline Management Plan (2011) which includes maintaining a continuous coastal route and improved coastal access as core management objectives. At the moment we are seeing quite unprecedented impacts on the coast path in Cornwall, due partly to on-going erosion by waves and high tides of course, but also it's highly likely that the prolonged rainfall we've had (following a hot, dry summer), is causing destabilisation, land slips and cliff falls along some of the softer geology frontages. Added to these factors, (and especially along the more urbanised frontages such as Newquay), development pressure close to the cliff edge also poses a risk to the long-term sustainability of the route.

**Natural England's comments**

We welcome the positive engagement from the Environment Agency during the development of our proposals. Within the Marsland Mouth to Newquay Coastal Access proposals there are no works within 16m of a main river or a flood defence.

The rollback proposals outlined in the MNQ3 report, tables 3.3.1 and 3.3.3, will enable the coast path to be adjusted more easily where it is affected by weather and wave action.

**Relevant appended documents:** N/A

**Other representations**

<b>Representation ID:</b>	MCA/MNQ3/R/4/MNQ1031
<b>Organisation/ person making representation:</b>	South West Coast Path Association
<b>Name of site:</b>	Penhalt Cliffs

<b>Report map reference:</b>	Map MNQ3a
<b>Route sections on or adjacent to the land:</b>	MNQ-3-S002 to MNQ-3-S004 inclusive
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b> The proposal to move the path off the road is a much-needed and welcome proposal which is strongly supported.  <i>Note: this is a duplicate of the 'full' representation from the Cornwall Countryside Access Forum (MCA/MNQ3/R/1/MNQ0973)</i>	
<b>Natural England's comment:</b> We welcome the positive engagement from the South West Coast Path Association during the development of our proposals and the supportive comment in its representation. We have no further comments about the representation.	
<b>Relevant appended documents:</b> N/A	

<b>Representation ID:</b>	MCA/MNQ3/R/5/MNQ1031
<b>Organisation/ person making representation:</b>	South West Coast Path Association
<b>Name of site:</b>	Bridwill Point
<b>Report map reference:</b>	MNQ3a
<b>Route sections on or adjacent to the land:</b>	MNQ-3-S009
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b> The improvement proposals to realign the route slightly to avoid areas of slippage and to improve the surfacing are supported.  <i>Note: this is a duplicate of the 'full' representation from the Cornwall Countryside Access Forum (MCA/MNQ3/R/2/MNQ0973)</i>	
<b>Natural England's comment:</b> We welcome the positive engagement from the South West Coast Path Association during the development of our proposals and the supportive comment in its representation. We have no further comments about the representation.	
<b>Relevant appended documents:</b> N/A	

<b>Representation ID:</b>	MCA/MNQ3/R/6/MNQ1031
<b>Organisation/ person making representation:</b>	South West Coast Path Association
<b>Name of site:</b>	Millook
<b>Report map reference:</b>	MNQ3b

<b>Route sections on or adjacent to the land:</b>	MNQ-3-S011
<b>Other reports within stretch to which this representation also relates</b>	N/A
<p><b>Summary of representation:</b>  A route landward of the road section should be considered.</p> <p><i>Note: this is a duplicate of the 'full' representation from the Cornwall Countryside Access Forum (MCA/MNQ3/R/3/MNQ0973)</i></p>	
<p><b>Natural England's comment:</b></p> <p>We were initially hopeful that an alignment could be found to take walkers off the 320 metre section of road. However, as acknowledged in the representation and table 3.3.4 of report MNQ3, the land seaward of the road is prone to subsidence and so is unsuitable for creating a new route on. The ground landward of the road is very steep and undulating; any route across this area would introduce more ascent/descent to an already physically challenging coast path walk around Millook (see document A in section 5 below). In order to implement such a route it would be necessary to excavate a path and install hundreds of steps. Our view is that the costs of doing so outweigh the potential public benefit; it is proposed that walkers continue to follow the existing South West Coast Path along the road which gently ascends/descends the gradient. The Access Authority have confirmed that traffic on the road moves slowly because of its twisting nature and suggest there is a low risk to walkers.</p>	
<p><b>Relevant appended documents:</b></p> <p><input type="checkbox"/> <b>Document A:</b> shows the contours of the ground landward of the road section MNQ-3-S011</p>	

# Length Report 4

## *Full representations*

<b>Representation number:</b>	MCA/MNQ4/R/1/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum
<b>Route section(s) specific to this representation:</b>	Map MNQ4a; MNQ-4-S003
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Crackington Haven: The crossing of the stream at Crackington Haven ideally needs a new bridge. There have been suggestions that a more inland alignment than the current route might be used for a new bridge. This would provide an inferior experience for walkers in terms of the environment and sea views. It is noted that the proposal here is to provide a new bridge on the existing alignment and this proposal is fully supported.	
<b>Natural England's comments</b>	
We welcome the positive engagement from the Cornwall Countryside Access Forum during the development of our proposals and the supportive comment in its representation. We have no further comments about the representation.	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/MNQ4/R/2/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum
<b>Route section(s) specific to this representation:</b>	Map MNQ4e; MNQ-4-S069 and MNQ-4-S070
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Fire Beacon Point: There is an abrupt change in the level of the path which requires use of a steep, rocky and exposed flight of steps. Use of the steps can be particularly daunting when descending. While there is a permissive inland alternative this means omitting a particularly fine length of path on Beeny Cliff. It is suggested that improvements to the steps are required to enable safer use of the steps, especially when descending.	
<b>Natural England's comments</b>	
The route descending from Fire Beacon Point using a long flight of steps seems very dramatic because the user feels exposed to the elements next to rocky, steep, cliffs. However, the National Trust (landowners) and the Access Authority do not consider this route to be dangerous or in need of further improvement to the steps. For those walkers daunted by the steep descent, or visiting during wet and windy conditions, there is already a well-used and signposted alternative route which goes slightly inland and avoids the steps; this provides equally good sea views for the walker (see document A in section 5 below).	
<b>Relevant appended documents (see section 5):</b>	
<input type="checkbox"/> <b>Document A:</b> MCA/MNQ4/R/2/MNQ0973 - Map shows the proposed route of ECP, the existing optional inland route and the section of steep steps referred to in the representation	

<b>Representation number:</b>	MCA/MNQ4/R/3/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum

<b>Route section(s) specific to this representation:</b>	MNQ4a; MNQ-4-S003
<b>Other reports within stretch to which this representation also relates:</b>	MNQ 2 (MNQ-2-S065), MNQ 8 (MNQ-8-S005; MNQ-8-S030; MNQ-8-S031), MNQ 9 (MNQ9S031), MNQ 10 (MNQ-10-S003)
<b>Representation in full</b>	
There are a number of locations where changes and improvements to furniture are proposed. It is important that any such changes, and especially those identified above, do not inhibit use by mobility vehicles. Further, any such changes should actively improve the possibility of use by mobility vehicles where the surrounding nature of the route makes this feasible. This is especially the case adjacent to locations where such use is already encouraged and catered for.	
<b>Natural England's comments</b>	
All new infrastructure proposed in the Marsland Mouth to Newquay coastal access reports will comply to the British Standard 5709:2018 Gaps, Gates and Stiles. In particular to MNQ4, the proposed footbridge at Crackington Haven will be installed to allow convenient access for off-road mobility scooter riders.	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/MNQ4/R/5/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	All route sections on maps MNQ4a, MNQ4b and MNQ4c
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
We welcome the designation of a considerable area of coastal margin landward of the path giving the public the opportunity of enjoying more than just a narrow strip along the coast, which here has a designation of Heritage Coast and is situated in a wider Area of Outstanding Natural Beauty.	
We note that part of the designated area west of Pengold (grid ref SX1330 9421) appears to fall just outside the extent of maps b and c although it is fairly clear that the road forms the landward boundary. We suggest an adjustment to the extent of the map to clarify the limits of the designated area.	
<b>Natural England's comments</b>	
We welcome the positive engagement from the Ramblers' Association during the development of our proposals and the supportive comment in its representation. As highlighted in the representation, the full extent of the boundary of the landward coastal margin (pink shading) was not shown on the report maps MNQ4b and MNQ4c. We have prepared revised maps which show its full extent and these are included in section 5 of this document. The relevant land is owned by the National Trust, which gave its agreement for it to form part of the landward coastal margin before the report was published, having consulted with the farm tenant. Accordingly we The Secretary of State ask that the Secretary of State notes the omission in the original report. We have published a revised version of the report with the amended maps and a note to explain the amendment.	
<b>Relevant appended documents (see section 5):</b>	
<ul style="list-style-type: none"> <li>• <b>Document B:</b> Revised map MNQ4b</li> <li>• <b>Document C:</b> Revised map MNQ4c</li> </ul>	

<b>Representation number:</b>	MCA/stretch/R/1/MNQ0975
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<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	Map MNQ4e, section MNQ-4-S077
<b>Other reports within stretch to which this representation also relates:</b>	MNQ3, MNQ5, MNQ6, MNQ7 & MNQ9
<b>Representation in full</b>	
<p>On a National Trail, limitations such as gates and stiles should, where possible, conform to the BS5709:2018 or at least an earlier British Standard. Within the last two years, several kissing gates have been erected on the South West Coast Path, now to become the route for the England Coast Path, which fall far short of the width and other requirements of the Standard. This makes use of the path by walkers carrying large rucksacks difficult and structures should be modified or replaced so that they conform to standard where practical. BS5709 requires a clear width of at least 1.0m to be available through kissing gates. For walkers carrying large rucksacks, narrow kissing gates are often far more difficult to negotiate than stiles. Where structures are replaced, consideration should be given to the needs of those using mobility vehicles where the rest of the path would be accessible but for the structures (Equality Act 2010).</p> <p>Locations are listed below. The Report shows no proposed works at these locations to mitigate the shortcomings.</p> <ol style="list-style-type: none"> <li>1. Map MNQ3e, section MNQ-3-S050: Castle Point SX145975 new kissing gate, gap only 420mm.</li> <li>2. Map MNQ4e, section MNQ-4-S077: Hillsborough SX109918 new kissing gate, gap only 450mm.</li> <li>3. Map MNQ5a, section MNQ-5-S013: Forrabury Common, SX 0915 9091, staggered barrier at bottom of steps, gap only 625mm.</li> <li>4. Map MNQ5c, section MNQ-5-S052: West of Bossinney Haven, SX0651 8938, squeeze stile only 350mm wide at waist height.</li> <li>5. Map MNQ6d, section MNQ-6-S061/S062: Bounds Cliff, SX 0231 8125, unnecessary timber stile in tandem with good quality stone stile.</li> <li>6. Map MNQ7a, section MNQ-5-S011: Varley Head, SW985813, kissing gate has gap of only 630mm.</li> <li>7. Map MNQ7e, section MNQ-7-S066: South of Pentire Point, SW930801, path restricted to 610mm width by timber rails</li> <li>8. Map MNQ9f, section MNQ-9-S135, Long Cove, SW860763: On the recently realigned path the new kissing gate has a gap of only 680mm.</li> </ol>	
<b>Natural England's comments</b>	
<p>We thank the Ramblers for their detailed representation, which we have passed to the Access Authority for consideration. Both we and the Access Authority agree in principle that gates should conform to the most recent British Standard and any new access furniture detailed in the Marsland Mouth to Newquay Coastal Access reports will be installed in compliance with BS 5709:2018, the British Standard for Gaps, Gates and Stiles.</p> <p>In deciding what to include in the draft schedule for England Coast Path Works we took the view that replacement of small standard items such as gates and signposts on the existing coast path should not be a priority for inclusion. This is primarily because a separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with these costs if the Access Authority agrees they are necessary.</p>	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/stretch/R/2/MNQ1033
<b>Organisation/ person making representation:</b>	Environment Agency



<b>Route section(s) specific to this representation:</b>	Whole stretch
<b>Other reports within stretch to which this representation also relates:</b>	MNQ1 - MNQ11
<b>Representation in full</b>	
Please can we make the below general comments:	
<ol style="list-style-type: none"> <li>1. We would like to highlight that works within 16m of a Main River or a flood defence may require an Environmental Permit for Flood Risk Activities.</li> <li>2. The proposals are broadly supported by the Cornwall and Isles of Scilly Shoreline Management Plan (2011) which includes maintaining a continuous coastal route and improved coastal access as core management objectives. At the moment we are seeing quite unprecedented impacts on the coast path in Cornwall, due partly to on-going erosion by waves and high tides of course, but also it's highly likely that the prolonged rainfall we've had (following a hot, dry summer), is causing destabilisation, land slips and cliff falls along some of the softer geology frontages. Added to these factors, (and especially along the more urbanised frontages such as Newquay), development pressure close to the cliff edge also poses a risk to the long-term sustainability of the route.</li> </ol>	
<b>Natural England's comments</b>	
<p>We welcome the positive engagement from the Environment Agency during the development of our proposals. Within the Marsland Mouth to Newquay Coastal Access reports there are no proposed works within 16m of a main river or a flood defence.</p> <p>The rollback proposals outlined in the MNQ4 report, tables 4.3.1 and 4.3.2, will enable the coast path to be adjusted more easily where it is affected by weather and wave action.</p>	
<b>Relevant appended documents:</b> N/A	

### ***Other representations***

<b>Representation ID:</b>	MCA/MNQ4/R/4/MNQ1031
<b>Organisation/ person making representation:</b>	South West Coast Path Association
<b>Name of site:</b>	Crackington Haven
<b>Report map reference:</b>	MNQ4a
<b>Route sections on or adjacent to the land:</b>	MNQ-4-S003
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b>	
The proposal to provide a new bridge on the existing alignment is fully supported.	
<i>Note: this is a duplicate of the 'full' representation from the Cornwall Countryside Access Forum (MCA/MNQ4/R/1/MNQ0973)</i>	
<b>Natural England's comment:</b>	
We welcome the positive engagement from the South West Coast Path Association during the development of our proposals and the supportive comment in its representation. We have no further comments about the representation.	
<b>Relevant appended documents:</b> N/A	

# Length Report 5

## *Full representations*

<b>Representation number:</b>	MCA/MNQ5/R/1/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	All route sections on map MNQ5e
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
We welcome the designation of a considerable area of coastal margin landward of the path, particularly the fields south of Tintagel Church, giving the public the opportunity of enjoying more than just a narrow strip along the coast, which here has a designation of Heritage Coast and is situated in a wider Area of Outstanding Natural Beauty.	
<b>Natural England's comments</b>	
We welcome the positive engagement from the Ramblers' Association during the development of our proposals and the supportive comments in its representation. We have no further comments about the representation.	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/stretch/R/1/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	Map MNQ5a, section MNQ-5-S013; Map MNQ5c, section MNQ-5-S052
<b>Other reports within stretch to which this representation also relates:</b>	MNQ3, MNQ4, MNQ6, MNQ7 & MNQ9
<b>Representation in full</b>	

On a National Trail, limitations such as gates and stiles should, where possible, conform to the BS5709:2018 or at least an earlier British Standard. Within the last two years, several kissing gates have been erected on the South West Coast Path, now to become the route for the England Coast Path, which fall far short of the width and other requirements of the Standard. This makes use of the path by walkers carrying large rucksacks difficult and structures should be modified or replaced so that they conform to standard where practical. BS5709 requires a clear width of at least 1.0m to be available through kissing gates. For walkers carrying large rucksacks, narrow kissing gates are often far more difficult to negotiate than stiles. Where structures are replaced, consideration should be given to the needs of those using mobility vehicles where the rest of the path would be accessible but for the structures (Equality Act 2010).

Locations are listed below. The Report shows no proposed works at these locations to mitigate the shortcomings.

1. Map MNQ3e, section MNQ-3-S050: Castle Point SX145975 new kissing gate, gap only 420mm.
2. Map MNQ4e, section MNQ-4-S077: Hillsborough SX109918 new kissing gate, gap only 450mm.
3. Map MNQ5a, section MNQ-5-S013: Forrabury Common, SX 0915 9091, staggered barrier at bottom of steps, gap only 625mm.
4. Map MNQ5c, section MNQ-5-S052: West of Bossinney Haven, SX0651 8938, squeeze stile only 350mm wide at waist height.
5. Map MNQ6d, section MNQ-6-S061/S062: Bounds Cliff, SX 0231 8125, unnecessary timber stile in tandem with good quality stone stile.
6. Map MNQ7a, section MNQ-5-S011: Varley Head, SW985813, kissing gate has gap of only 630mm.

7. Map MNQ7e, section MNQ-7-S066: South of Pentire Point, SW930801, path restricted to 610mm width by timber rails
8. Map MNQ9f, section MNQ-9-S135, Long Cove, SW860763: On the recently realigned path the new kissing gate has a gap of only 680mm.

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

We thank the Ramblers for their detailed representation, which we have passed to the Access Authority for consideration. Both we and the Access Authority agree in principle that gates should conform to the most recent British Standard and any new access furniture detailed in the Marsland Mouth to Newquay Coastal Access reports will be installed in compliance with BS 5709:2018, the British Standard for Gaps, Gates and Stiles.

In deciding what to include in the draft schedule for England Coast Path Works we took the view that replacement of small standard items such as gates and signposts on the existing coast path should not be a priority for inclusion. This is primarily because a separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with these costs if the Access Authority agrees they are necessary.

**Relevant appended documents:** N/A

<b>Representation number:</b>	MCA/stretch/R/2/MNQ1033
<b>Organisation/ person making representation:</b>	Environment Agency
<b>Route section(s) specific to this representation:</b>	Whole stretch
<b>Other reports within stretch to which this representation also relates:</b>	MNQ1 - MNQ11
<b>Representation in full</b>	

Please can we make the below general comments:

1. We would like to highlight that works within 16m of a Main River or a flood defence may require an Environmental Permit for Flood Risk Activities.
2. The proposals are broadly supported by the Cornwall and Isles of Scilly Shoreline Management Plan (2011) which includes maintaining a continuous coastal route and improved coastal access as core management objectives. At the moment we are seeing quite unprecedented impacts on the coast path in Cornwall, due partly to on-going erosion by waves and high tides of course, but also it's highly likely that the prolonged rainfall we've had (following a hot, dry summer), is causing destabilisation, land slips and cliff falls along some of the softer geology frontages. Added to these factors, (and especially along the more urbanised frontages such as Newquay), development pressure close to the cliff edge also poses a risk to the long-term sustainability of the route.

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

We welcome the positive engagement from the Environment Agency during the development of our proposals. Within the Marsland Mouth to Newquay Coastal Access reports there are no proposed works within 16m of a main river or a flood defence.

The rollback proposals outlined in the MNQ5 report, tables 5.3.1 and 5.3.2, will enable the coast path to be adjusted more easily where it is affected by weather and wave action.

**Relevant appended documents:** N/A

#### ***Other representations***

No 'other' representations were submitted against length report MNQ5

## **Length Report 7**

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

<b>Representation number:</b>	MCA/MNQ7/R/1/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	All route sections on maps MNQ7c to MNQ7f
<b>Other reports within stretch to which this representation also relates:</b>	N/A

#### **Representation in full**

We welcome the designation of a considerable area of coastal margin landward of the path, giving the public the opportunity of enjoying more than just a narrow strip along the coast, which here has a designation of Heritage Coast and is situated in a wider Area of Outstanding Natural Beauty. This area is a beautiful start/finish to the coast east of the River Camel.

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

We welcome the positive engagement from the Ramblers' Association during the development of our proposals and the supportive comment in its representation. We have no further comments about the representation.

**Relevant appended documents:** N/A

<b>Representation number:</b>	MCA/stretch/R/1/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	Map MNQ7a, section MNQ-7-S011; Map MNQ7e, section MNQ-7-S066
<b>Other reports within stretch to which this representation also relates:</b>	MNQ3, MNQ4, MNQ5, MNQ6 & MNQ9
<b>Representation in full</b>	
<p>On a National Trail, limitations such as gates and stiles should, where possible, conform to the BS5709:2018 or at least an earlier British Standard. Within the last two years, several kissing gates have been erected on the South West Coast Path, now to become the route for the England Coast Path, which fall far short of the width and other requirements of the Standard. This makes use of the path by walkers carrying large rucksacks difficult and structures should be modified or replaced so that they conform to standard where practical. BS5709 requires a clear width of at least 1.0m to be available through kissing gates. For walkers carrying large rucksacks, narrow kissing gates are often far more difficult to negotiate than stiles. Where structures are replaced, consideration should be given to the needs of those using mobility vehicles where the rest of the path would be accessible but for the structures (Equality Act 2010).</p> <p>Locations are listed below. The Report shows no proposed works at these locations to mitigate the shortcomings.</p> <ol style="list-style-type: none"> <li>1. Map MNQ3e, section MNQ-3-S050: Castle Point SX145975 new kissing gate, gap only 420mm.</li> <li>2. Map MNQ4e, section MNQ-4-S077: Hillsborough SX109918 new kissing gate, gap only 450mm.</li> <li>3. Map MNQ5a, section MNQ-5-S013: Forrabury Common, SX 0915 9091, staggered barrier at bottom of steps, gap only 625mm.</li> </ol>	
<ol style="list-style-type: none"> <li>4. Map MNQ5c, section MNQ-5-S052: West of Bossinney Haven, SX0651 8938, squeeze stile only 350mm wide at waist height.</li> <li>5. Map MNQ6d, section MNQ-6-S061/S062: Bounds Cliff, SX 0231 8125, unnecessary timber stile in tandem with good quality stone stile.</li> <li>6. Map MNQ7a, section MNQ-5-S011: Varley Head, SW985813, kissing gate has gap of only 630mm.</li> <li>7. Map MNQ7e, section MNQ-7-S066: South of Pentire Point, SW930801, path restricted to 610mm width by timber rails</li> <li>8. Map MNQ9f, section MNQ-9-S135, Long Cove, SW860763: On the recently realigned path the new kissing gate has a gap of only 680mm.</li> </ol>	
<b>Natural England's comments</b>	
<p>We thank the Ramblers for their detailed representation, which we have passed to the Access Authority for consideration. Both we and the Access Authority agree in principle that gates should conform to the most recent British Standard and any new access furniture detailed in the Marsland Mouth to Newquay Coastal Access reports will be installed in compliance with BS 5709:2018, the British Standard for Gaps, Gates and Stiles.</p> <p>In deciding what to include in the draft schedule for England Coast Path Works we took the view that replacement of small standard items such as gates and signposts on the existing coast path should not be a priority for inclusion. This is primarily because a separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with these costs if the Access Authority agrees they are necessary.</p>	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/stretch/R/2/MNQ1033
<b>Organisation/ person making representation:</b>	Environment Agency
<b>Route section(s) specific to this representation:</b>	Whole stretch
<b>Other reports within stretch to which this representation also relates:</b>	MNQ1 - MNQ11
<b>Representation in full</b>	
Please can we make the below general comments:	
<ol style="list-style-type: none"> <li>1. We would like to highlight that works within 16m of a Main River or a flood defence may require an Environmental Permit for Flood Risk Activities.</li> <li>2. The proposals are broadly supported by the Cornwall and Isles of Scilly Shoreline Management Plan (2011) which includes maintaining a continuous coastal route and improved coastal access as core management objectives. At the moment we are seeing quite unprecedented impacts on the coast path in Cornwall, due partly to on-going erosion by waves and high tides of course, but also it's highly likely that the prolonged rainfall we've had (following a hot, dry summer), is causing destabilisation, land slips and cliff falls along some of the softer geology frontages. Added to these factors, (and especially along the more urbanised frontages such as Newquay), development pressure close to the cliff edge also poses a risk to the long-term sustainability of the route.</li> </ol>	
<b>Natural England's comments</b>	
<p>We welcome the positive engagement from the Environment Agency during the development of our proposals. Within the Marsland Mouth to Newquay Coastal Access proposals there are no works within 16m of a main river or a flood defence.</p> <p>The rollback proposals outlined in the MNQ7 report, tables 7.3.1 and 7.3.2, will enable the coast path to be adjusted more easily where it is affected by weather and wave action.</p>	
<b>Relevant appended documents:</b> N/A	

### ***Other representations***

No 'other' representations were submitted against length report MNQ7

# Length Report 8

## Full representations

<b>Representation number:</b>	MCA MNQ8/R/1/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum
<b>Route section(s) specific to this representation:</b>	Map MNQ8a; route sections MNQ-8-S029 to MNQ-8-S031 inclusive
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
<p>There are proposals for a new boardwalk and footbridge at Daymer Bay, and these are welcomed and supported.</p> <p>However, the route crosses the beach for part of this length, and high tides are now meaning that this route often becomes unusable at such times. An off-beach alternative is needed to overcome this tidal problem, but has not been addressed by the proposals here.</p>	
<b>Natural England's comments</b>	
<p>During our initial discussions with the Access Authority (AA), Cornwall Countryside Access Forum and the South West Coast Path Association, the issue of the current beach route becoming impassable at exceptional high tides was not raised. Therefore our England Coast Path (ECP) proposals in report MNQ8 do not propose an alternative off-beach route for such occasions.</p> <p>Following their recent site visit, the AA have now confirmed that at high spring tides during stormy conditions the whole beach can become inundated with water which makes walking the proposed route difficult during the hour either side of high tide. There is a fence at the back of the beach which prevents the walker from accessing the higher ground and circumnavigating the beach. Therefore, whilst the AA agree that the normal route of the ECP should still cross the beach as proposed in our report, we have recently worked with them to investigate two options for walkers during periods when the 'ordinary' route is unavailable because of the tides.</p> <p>One option investigated was the public footpath, not currently in use, along the top of the sand dunes at the back of the beach (see document A, section 5 below). This hasn't been a walked route for at least 20 years. However, following recent storms in February 2020, the dunes have become severely eroded back from the fence line and so the definitive line of this footpath is no longer usable as it would now traverse the unstable and slumped face of the dunes (see document B).</p> <p>The second, and our proposed, option is for walkers to follow the existing network of inland public footpaths and permissive routes (see document A) which avoid the beach. We consider this route to be a suitable informal route for coast path walkers on the rare occasions when the beach route is impassable. The AA have recently improved signage at either end of the route affected by the tides to inform users of the options.</p> <p>Due to the infrequency of the high spring tides and the presence of an existing and signed route on the ground, we do not propose to recommend an optional alternative route for the ECP.</p>	
<b>Relevant appended documents (see section 5):</b>	
<p><b>Document A:</b> MCA/MNQ8/R/1/MNQ0973 – Map showing the normal proposed route of the ECP across the beach, the suggested optional alternative routes and the locations of establishment works</p>	

<b>Representation number:</b>	MCA/MNQ8/R/2/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum

<b>Route section(s) specific to this representation:</b>	Map MNQ 8a: route sections MNQ-8-S005; MNQ-8-S030; MNQ-8-S031
<b>Other reports within stretch to which this representation also relates:</b>	MNQ 2 (MNQ-2-S065), MNQ 4 (MNQ-4-S003), MNQ 9 (MNQ-9-S031), MNQ 10 (MNQ-10S003)
<b>Representation in full</b>	
There are a number of locations where changes and improvements to furniture are proposed. It is important that any such changes, and especially those identified above, do not inhibit use by mobility vehicles. Further, any such changes should actively improve the possibility of use by mobility vehicles where the surrounding nature of the route makes this feasible. This is especially the case adjacent to locations where such use is already encouraged and catered for.	
<b>Natural England's comments</b>	
All new infrastructure proposed in the Marsland Mouth to Newquay coastal access reports will comply with the British Standard 5709:2018 Gaps, Gates and Stiles. In particular to MNQ8, the boardwalk and two footbridges will be installed to allow convenient access for off-road mobility scooter riders (see sections 8.2.9 to 8.2.11, report MNQ8).	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/MNQ8/R/4/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	Map MNQ8b St Enodoc Golf Links; route sections MNQ-8-S038 to MNQ-8-S044
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
We welcome the designation of a considerable area of coastal margin landward of the path, giving the public the opportunity of enjoying more than just a narrow strip along the coast. This area has been enjoyed by the public on foot for many years and it is noted that the designated area extends to a wellused but unrecorded footpath. The designated area is formed of dunes and has very much a coastal character.	
<b>Natural England's comments</b>	
We welcome the positive engagement from the Ramblers' Association during the development of our proposals and the supportive comments in its representation. We have no further comments about the representation.	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/stretch/R/2/MNQ1033
<b>Organisation/ person making representation:</b>	Environment Agency
<b>Route section(s) specific to this representation:</b>	Whole stretch
<b>Other reports within stretch to which this representation also relates:</b>	MNQ1 - MNQ11



<p><b>Representation in full</b></p> <p>Please can we make the below general comments:</p> <ol style="list-style-type: none"> <li>1. We would like to highlight that works within 16m of a Main River or a flood defence may require an Environmental Permit for Flood Risk Activities.</li> <li>2. The proposals are broadly supported by the Cornwall and Isles of Scilly Shoreline Management Plan (2011) which includes maintaining a continuous coastal route and improved coastal access as core management objectives. At the moment we are seeing quite unprecedented impacts on the coast path in Cornwall, due partly to on-going erosion by waves and high tides of course, but also it's highly likely that the prolonged rainfall we've had (following a hot, dry summer), is causing destabilisation, land slips and cliff falls along some of the softer geology frontages. Added to these factors, (and especially along the more urbanised frontages such as Newquay), development pressure close to the cliff edge also poses a risk to the long-term sustainability of the route.</li> </ol>
<p><b>Natural England's comments</b></p> <p>We welcome the positive engagement from the Environment Agency during the development of our proposals. Within the Marsland Mouth to Newquay Coastal Access reports there are no proposed works within 16m of a main river or a flood defence.</p> <p>The rollback proposals outlined in the MNQ8 report, tables 8.3.1 and 8.3.2, will enable the coast path to be adjusted more easily where it is affected by weather and wave action.</p>
<p><b>Relevant appended documents:</b> N/A</p>

### **Other representations**

<b>Representation ID:</b>	MCA/MNQ8/R/3/MNQ1031
<b>Organisation/ person making representation:</b>	South West Coast Path Association
<b>Name of site:</b>	Daymer Bay
<b>Report map reference:</b>	MNQ8a
<b>Route sections on or adjacent to the land:</b>	MNQ-8-S029 to MNQ-8-S031 inclusive
<b>Other reports within stretch to which this representation also relates</b>	N/A
<p><b>Summary of representation:</b></p> <p>Proposals for a new boardwalk and footbridge at Daymer Bay are welcomed and supported. An inland alternative route is needed for occasions when high tides make the proposed route across the beach impassable.</p> <p><i>Note: this is a duplicate of the 'full' representation from the Cornwall Countryside Access Forum (MCA/MNQ8/R/1/MNQ0973)</i></p>	
<p><b>Natural England's comments:</b></p>	

During our initial discussions with the Access Authority, Cornwall Countryside Access Forum and the South West Coast Path Association, the issue of the current beach route becoming impassable at exceptional high tides was not raised. Therefore our ECP proposals in report MNQ8 do not currently consider an alternative off-beach route for such occasions.

Following their recent site visit, the Access Authority have now confirmed that at high spring tides during stormy conditions the whole beach can become inundated with water which makes walking the proposed route difficult during the hour either side of high tide. There is a fence at the back of the beach which prevents the walker from accessing the higher ground and circumnavigating the beach. Therefore, whilst the Access Authority agree that the normal route of the ECP should still cross the beach as proposed in the MNQ8 report, Natural England and the Access Authority are now investigating two options (as outlined below) for an optional alternative route to be used when the main or 'ordinary' route is unavailable because of the tides. Once these investigations are complete we intend to submit a separate variation report to the Secretary of State detailing our proposal.

The first and currently preferred option is a public footpath, not currently in use, which runs along the top of the raised bank at the back of the beach (see document A, section 5 below). The Access Authority have confirmed they intend to reinstate the use of this footpath, which would then provide a suitable optional alternative route for walkers during states of high tide. They will shortly commence discussions with the landowner about this. Depending on timescales, Natural England may be able to fund any necessary establishment works for this route, initially estimated at £7,000, through the coastal access programme.

The second option would be to direct walkers along the existing network of inland public footpaths (see document A, section 5 below) which are in current use and avoid the beach. However, we consider this to be the least favoured option as it takes the walker away from the coast and adds a considerable distance to the walkers' journey.

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

**Document A:** MCA/MNQ8/R/3/MNQ1031 – Map showing the normal proposed route of the ECP across the beach, the suggested optional alternative routes and the locations of establishment works. Map submitted by Natural England.

# Length Report 9

## Full representations

<b>Representation number:</b>	MCA/MNQ9/R/1/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum
<b>Route section(s) specific to this representation:</b>	Map MNQ9b; MNQ-9-S021 to MNQ-9-S030
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Harbour Cove to Hawker's Cove: Appropriate improvements to establish an all-ability path would be especially beneficial on this length, as it would then form part of a strategic all-ability route linking the coast with Padstow, Wadebridge, Bodmin and Bodmin Moor.	
<b>Natural England's comments</b>	
<p>These comments have been passed onto the Access Authority to inform their long-term planning for coastal access in North Cornwall.</p> <p>To the south of Harbour Cove there are separate plans to improve the route surface between Padstow and St George's Cove (funded by RDPE, outside of the coastal access programme), to provide convenient access for prams and mobility scooters.</p> <p>As part of the establishment works for the route proposed in report MNQ9 we envisage improvements to the route which would help to realise this ambition. At Harbour Cove a boardwalk will be installed (compliant with the British Standard 5709:2018) to improve access across boggy ground for all users. In addition, at Hawker's Cove the path will be resurfaced and the drainage improved to make this route more accessible and less hazardous for users in wet conditions.</p>	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/MNQ9/R/2/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum
<b>Route section(s) specific to this representation:</b>	Maps MNQ9d and MNQ9e; MNQ-9-S070 to MNQ-9-S091 inclusive
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Trevone to Harlyn Bay: This could be an appropriate length to establish an all-ability path, requiring only a few changes in path furniture to achieve a considerable improvement in access for all.	
<b>Natural England's comments</b>	
<p>No specific infrastructure improvements were suggested for this stretch of coast path during our initial consultation meetings with the Access Authority and other interested parties. Therefore we have not proposed any path or infrastructure improvements between Trevone and Harlyn Bay within our MNQ9 report. However, we will ask the Cornwall Countryside Access Forum for further details about their improvement ideas in these locations. In addition, the comments within the representation have been passed onto the Access Authority to inform their long-term planning for coastal access in North Cornwall.</p>	

**Relevant appended documents:** N/A

<b>Representation number:</b>	MCA/MNQ9/R/3/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum
<b>Route section(s) specific to this representation:</b>	Map MNQ9e; MNQ-9-S094 to MNQ-9-S097
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Harlyn Bay: While there are concerns regarding the use of the beach at Harlyn Bay for the route, it is noted that research suggests it is unavailable for use for only 2.1% of the time. This is accepted, but given changing sea level patterns elsewhere on the North Cornwall coast, it is suggested that the monitoring of times of beach unavailability is continued to ensure that the situation does not deteriorate.	
<b>Natural England's comments</b>	
These comments will be passed onto the Access Authority who will continue to monitor the situation regarding high tides and occasions when the beach route becomes impassable. If the situation deteriorates and the beach route becomes impassable on a more regular basis there are two potential courses of action: <ul style="list-style-type: none"><li>• we could submit a separate variation report to the Secretary of State detailing proposals for an optional alternative route; or</li><li>• we could use roll back provisions proposed in table 9.3.4 of report MNQ9 to move the route landward of the beach, without further recourse to the Secretary of State.</li></ul> We would decide which of these two options is most appropriate according to the circumstances at the time.	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/MNQ9/R/4/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum
<b>Route section(s) specific to this representation:</b>	Map MNQ9h; MNQ-9-S158 to MNQ-9-S161 inclusive
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Constantine Bay: It is not obvious to all walkers that the line of the path crosses the beach between the proposed new steps at Booby's Bay and the southern end of Constantine Bay; incidents have been noted of walkers straying inland into the dunes. It is suggested that clear signposting at both ends of this length be erected to clarify the route.	
<b>Natural England's comments</b>	
We have passed these comments to the Access Authority, which has responsibility for ensuring that the existing route is clearly signposted.	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/MNQ9/R/5/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum
<b>Route section(s) specific to this representation:</b>	MNQ-9-S031
<b>Other reports within stretch to which this representation also relates:</b>	MNQ 2 (MNQ-2-S065), MNQ 4 (MNQ-4-S003), MNQ 8 (MNQ-8-S005; MNQ-8-S030; MNQ8S031), MNQ 10 (MNQ-10-S003)
<b>Representation in full</b>	
There are a number of locations where changes and improvements to furniture are proposed. It is important that any such changes, and especially those identified above, do not inhibit use by mobility vehicles. Further, any such changes should actively improve the possibility of use by mobility vehicles where the surrounding nature of the route makes this feasible. This is especially the case adjacent to locations where such use is already encouraged and catered for.	
<b>Natural England's comments</b>	
All new infrastructure proposed in the Marsland Mouth to Newquay coastal access reports will comply to the British Standard 5709:2018 Gaps, Gates and Stiles. In particular to MNQ9, the boardwalk will be installed to allow convenient access for off-road mobility scooter riders.	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/MNQ9/R/7/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	MNQ-9-S094 to S098
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Harlyn Bay: There is an obvious problem with routing the coast path along the beach in that it is at times inundated by the tide, which is acknowledged in the Report, section 9.3.3. The assessment gives a misleading confidence in the stated times that the path will be unusable. The calculation is probably based on still water, whereas the beach is exposed to northerly winds which will generate large waves, making the path impassable, and possibly dangerous, for much greater periods of time. The level of an	

exposed sandy beach such as this varies during the year, depending on earlier storm action, and variations in level of one metre are not in the least unusual.

If the path is to be routed along the beach it is therefore essential that an alternative and reasonably convenient path is available when the beach is unavailable because of tide and wave action. The report states that an optional alternative route could cause privacy and security concerns for local residents but it is unclear why these should be higher here than elsewhere along the coast where the path passes close to domestic gardens. When the beach path is not available, the alternative route heading west on recorded public paths and roads takes the walker to Booby's Bay, entirely missing out Polventon Bay and the significant landmark Trevoze Head. The east bound walker would have to retrace their steps by several kilometres to Booby's Bay before crossing the headland and it would probably be quicker to wait the hour or two for the tide and waves to drop enough to pass.

The definitive map records a public footpath, St Merryn 2, through the gardens of houses backing the beach [see document A in section 5 below]. The Wildlife and Countryside Act 1981 s56 states that this shall be conclusive evidence as to the particulars contained therein. The Report makes no mention of consideration of routing the coast path along the public footpath. We suggest that if no alternative to the beach is provided, the public right to use this footpath is asserted. This is likely to be available at all states of the tide, is close to the sea and has good views of it, thus meeting the main requirements of the Coastal Access Scheme.

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

The calculation of times when the beach route becomes impassable due to high tides was based on visual observations and data derived from the Environment Agency's LIDAR surveying results. The comments regarding the weather conditions and changing height levels of the beach, which could potentially affect the calculations, are noted and will be passed to the Access Authority who will continue to monitor the situation during exceptional high tides which occur a small number of times each year. If the situation deteriorates and the beach route becomes impassable on a more regular basis there are two potential courses of action:

- we could submit a separate variation report to the Secretary of State detailing proposals for an optional alternative route; or
- we could use roll back provisions proposed in table 9.3.4 of report MNQ9 to move the route landward of the beach, without further recourse to the Secretary of State.

We would decide which of these two options is most appropriate according to the circumstances at the time.

The public footpath, St Merryn 2, which ran along the top of the cliff at the back of the beach is no longer in use due to cliff erosion. The line of the footpath now follows an eroded cliff bank, which is dangerous to access, and also passes through private gardens (see document B in section 5 below). This route was therefore deemed unsuitable as an optional alternative route for our coastal access proposals. The information regarding St Merryn 2 footpath has been passed to the Access Authority for consideration as part of any future review of their definitive map records.

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

**Document A:** MCA/MNQ9/R/7/MNQ0975 – Map accompanying the full representation from the Ramblers' Association, Cornwall. Showing the definitive map record of the public footpath, St Merryn 2  
**Document B:** MCA/MNQ9/R/7/MNQ0975 – Aerial photo showing the unused public footpath, St Merryn 2. Document submitted by Natural England.

<b>Representation number:</b>	MCA/MNQ9/R/8/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	MNQ-9-S126

<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
<p>Mother Ivey Cottage: The proposed route for the England Coast Path follows the used route of the South West Coast Path. This straight line path on the field edge, but fenced off from it, gets very muddy after prolonged rain and at all times in winter, is only 1.2m wide making it difficult to pass others, particularly with large rucksacks, is very busy and has no sea views. In its present state it is unsatisfactory as the route of a National Trail but there are no works proposed in the Report. If this route is to be used its surface needs hardening and it needs widening to 4m in accordance with the Coastal Access Scheme but it will still have no coastal views.</p> <p>The Report gives no consideration on this section to the use of public footpath St Merryn 2 which uses a more seaward route which probably has sea views but is obstructed by the boundary fence of the house. I can find no record of this path ever having been legally diverted [see <i>document C in section 5 below</i>].</p>	
<b>Natural England's comments</b>	
<p>The proposed route for the England Coast Path (ECP) follows the existing route of the South West Coast Path along a field edge (see document D in section 5 below). Repeated, unsuccessful, attempts were made by Natural England during development of the proposals for Marsland Mouth to Newquay to contact the landowner to discuss path improvements, namely resurfacing and possibly widening. The Access Authority have confirmed that the average width of the footpath St Merryn 2 (which is the same path as referred to in the previous representation, MCA/MNQ9/R/7/MNQ0975), is recorded as 3 feet in the Public Right of Way definitive statement (dated 31.10.1996).</p> <p>Natural England will continue to work with the Access Authority to investigate opportunities for future path improvements along the proposed route. We would be happy in principle to fund the suggested improvements as part of the coast path establishment works, if the landowner's agreement can be secured while funding is available. However, it should be noted that the coastal access scheme doesn't prescribe that the route should be 4m in width rather that we work with existing boundary features to propose something that makes sense on the ground (see paragraph 4.3.4 of the <a href="#">Coastal Access Scheme</a>).</p> <p>The definitive line of the unused footpath, St Merryn 2, goes through the grounds of a house (see document D in section 5 below). The information will be passed to the Access Authority to review their definitive map records and confirm the status of the path.</p>	
<p><b>Relevant appended documents (see section 5):</b></p> <p><b>Document C:</b> MCA/MNQ9/R/8/MNQ0975 – Map accompanying the full representation from the Ramblers' Association, Cornwall. Showing the definitive map record of the public footpath, St Merryn 2.</p> <p><b>Document D:</b> MCA/MNQ9/R/8/MNQ0975 – Aerial photo showing the proposed route of the ECP and the unused public footpath, St Merryn 2. Document submitted by Natural England.</p>	

<b>Representation number:</b>	MCA/MNQ9/R/9/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	Maps MNQ9g and 9h
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	

We welcome the designation of coastal margin landward of the path at Trevoze Head, Constantine Bay and parts in between the two. Trevoze Head is a very significant promontory and the opportunity of enjoying more than just a narrow strip along the coast will be enjoyed by many people. The towans at the back of Constantine Bay have always been used by the public and are very much a coastal feature. For many years they have also provided a footpath link to the north for those using footpath 8, as its seaward end was overgrown with blackthorn and impassable. Recent clearance of the blackthorn has made the towans more accessible on foot and no doubt improved the natural coastal habitat. The whole of this area is designated Area of Outstanding Natural Beauty and north of Booby's Bay designated Heritage Coast.

### Natural England's comments

We welcome the positive engagement from the Ramblers' Association during the development of our proposals and the supportive comments in its representation. We have no further comments about the representation.

**Relevant appended documents:** N/A

<b>Representation number:</b>	MCA/stretch/R/1/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	Map MNQ9f, section MNQ-9-S135
<b>Other reports within stretch to which this representation also relates:</b>	MNQ3, MNQ4, MNQ5, MNQ6 & MNQ7

### Representation in full

On a National Trail, limitations such as gates and stiles should, where possible, conform to the BS5709:2018 or at least an earlier British Standard. Within the last two years, several kissing gates have been erected on the South West Coast Path, now to become the route for the England Coast Path, which fall far short of the width and other requirements of the Standard. This makes use of the path by walkers carrying large rucksacks difficult and structures should be modified or replaced so that they conform to standard where practical. BS5709 requires a clear width of at least 1.0m to be available through kissing gates. For walkers carrying large rucksacks, narrow kissing gates are often far more difficult to negotiate than stiles. Where structures are replaced, consideration should be given to the needs of those using mobility vehicles where the rest of the path would be accessible but for the structures (Equality Act 2010).

Locations are listed below. The Report shows no proposed works at these locations to mitigate the shortcomings.

1. Map MNQ3e, section MNQ-3-S050: Castle Point SX145975 new kissing gate, gap only 420mm.
2. Map MNQ4e, section MNQ-4-S077: Hillsborough SX109918 new kissing gate, gap only 450mm.
3. Map MNQ5a, section MNQ-5-S013: Forrabury Common, SX 0915 9091, staggered barrier at bottom of steps, gap only 625mm.
4. Map MNQ5c, section MNQ-5-S052: West of Bossinney Haven, SX0651 8938, squeeze stile only 350mm wide at waist height.
5. Map MNQ6d, section MNQ-6-S061/S062: Bounds Cliff, SX 0231 8125, unnecessary timber stile in tandem with good quality stone stile.
6. Map MNQ7a, section MNQ-5-S011: Varley Head, SW985813, kissing gate has gap of only 630mm.
7. Map MNQ7e, section MNQ-7-S066: South of Pentire Point, SW930801, path restricted to 610mm width by timber rails
8. Map MNQ9f, section MNQ-9-S135, Long Cove, SW860763: On the recently realigned path the new kissing gate has a gap of only 680mm.



<b>Natural England's comments</b>
<p>We thank the Ramblers for their detailed representation, which we have passed to the Access Authority for consideration. Both we and the Access Authority agree in principle that gates should conform to the most recent British Standard and any new access furniture detailed in the Marsland Mouth to Newquay Coastal Access reports will be installed in compliance with BS 5709:2018, the British Standard for Gaps, Gates and Stiles.</p> <p>In deciding what to include in the draft schedule for England Coast Path Works we took the view that replacement of small standard items such as gates and signposts on the existing coast path should not be a priority for inclusion. This is primarily because a separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with these costs if the Access Authority agrees they are necessary.</p>
<b>Relevant appended documents:</b> N/A

<b>Representation number:</b>	MCA/stretch/R/2/MNQ1033
<b>Organisation/ person making representation:</b>	Environment Agency
<b>Route section(s) specific to this representation:</b>	Whole stretch
<b>Other reports within stretch to which this representation also relates:</b>	MNQ1 - MNQ11

#### Representation in full

Please can we make the below general comments:

1. We would like to highlight that works within 16m of a Main River or a flood defence may require an Environmental Permit for Flood Risk Activities.
2. The proposals are broadly supported by the Cornwall and Isles of Scilly Shoreline Management Plan (2011) which includes maintaining a continuous coastal route and improved coastal access as core management objectives. At the moment we are seeing quite unprecedented impacts on the coast path in Cornwall, due partly to on-going erosion by waves and high tides of course, but also it's highly likely that the prolonged rainfall we've had (following a hot, dry summer), is causing destabilisation, land slips and cliff falls along some of the softer geology frontages. Added to these factors, (and especially along the more urbanised frontages such as Newquay), development pressure close to the cliff edge also poses a risk to the long-term sustainability of the route.

#### Natural England's comments

We welcome the positive engagement from the Environment Agency during the development of our proposals. Within the Marsland Mouth to Newquay Coastal Access proposals there are no works within 16m of a main river or a flood defence.

The rollback proposals outlined in the MNQ9 report, tables 9.3.1 and 9.3.4, will enable the coast path to be adjusted more easily where it is affected by weather and wave action.

**Relevant appended documents (see section 6):** N/A

#### Other representations

<b>Representation ID:</b>	MCA/MNQ9/R/6/MNQ1031
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<b>Organisation/ person making representation:</b>	South West Coast Path Association
<b>Name of site:</b>	Harlyn Bay
<b>Report map reference:</b>	MNQ9e
<b>Route sections on or adjacent to the land:</b>	MNQ-9-S094 to MNQ-9-S097
<b>Other reports within stretch to which this representation also relates</b>	N/A
<p><b>Summary of representation:</b> Monitoring of times of beach unavailability, due to high tides, should be continued to ensure that the situation does not deteriorate.</p> <p><i>Note: this is a duplicate of the 'full' representation from the Cornwall Countryside Access Forum (MCA/MNQ9/R/3/MNQ0973)</i></p>	
<p><b>Natural England's comment:</b> These comments will be passed onto the Access Authority who will continue to monitor the situation regarding high tides and occasions when the beach route becomes impassable. If the situation deteriorates and the beach route becomes impassable on a more regular basis there are two potential courses of action:</p> <ul style="list-style-type: none"> <li>• we could submit a separate variation report to the Secretary of State detailing proposals for an optional alternative route; or</li> <li>• we could use roll back provisions proposed in table 9.3.4 of report MNQ9 to move the route landward of the beach, without further recourse to the Secretary of State.</li> </ul> <p>We would decide which of these two options is most appropriate according to the circumstances at the time.</p>	
<b>Relevant appended documents:</b> N/A	
<b>Representation ID:</b>	MCA/MNQ9/R/10/MNQ0105
<b>Organisation/ person making representation:</b>	Wallsend Estates Ltd
<b>Name of site:</b>	Mother Ivey
<b>Report map reference:</b>	MNQ9f
<b>Route sections on or adjacent to the land:</b>	MNQ-9-S120 to S123
<b>Other reports within stretch to which this representation also relates</b>	N/A

**Summary of representation:**

The caravan park owners are concerned about the roll-back proposals described in the report whereby a new route could pass through the site, as opposed to somewhere on the landward side of the park. A route through the site would not be compatible with the interests of the public, the park owner or the owners and occupiers of the caravans. The site is dormant for the 5 winter months each year, during which time a security team patrol the area. A route through the park would make it difficult to maintain security and impose additional security costs. During the dormant months, maintenance work is carried out using heavy machinery to relocate caravans; this is not compatible with the presence of public on the site. When caravan owners are present their privacy needs respecting, children's play areas need to remain private, on-site facilities need to be reserved solely for paying guests, clear boundaries need to be in place between private and public places without segregation within the site, routine maintenance and other work operations needs to happen from time to time. Paragraph 8.19.8 of the Coastal Access Scheme refers to how, in situations like this, a route landward of a caravan park would be aligned to strike a fair balance between the interests of the public and the various owners and occupiers of the park. The Coastal Access Scheme also recognises that a greater degree of privacy and security is required by children or young people.

The report should be worded so it is possible to understand precisely, at this location, how coastal access will be dealt with and what considerations will come into play if the path is to roll-back in the future.

**Natural England's comment:**

Natural England note the concerns of the caravan park owners about any future roll-back measures which may be introduced with the Coastal Access programme. We are not in a position to clearly outline where the path may roll-back to, until such a time comes when these measures are needed. As detailed in the Coastal Access report MNQ9, section 9.3.4, if it is no longer possible to find a viable route seaward of the caravan park we will choose a new route after detailed discussions with all relevant interests. It could either pass through the site or if this is not practicable, could pass somewhere on the landward side of it. In reaching this judgement we will have full regard to the need to seek a fair balance between the interests of the affected landowner and those of the public. The issues outlined in the representation concerning privacy, security and child safe-guarding will be addressed during discussions with the landowner during any roll-back scenarios in the future, if they still apply at the time.

**Relevant appended documents:** N/A

## Length Report 10

### *Full representations*

<b>Representation number:</b>	MCA/MNQ10/R/1/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum
<b>Route section(s) specific to this representation:</b>	Map MNQ10a; route sections MNQ-10-S010 and MNQ-10-S011
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	

Treyarnon Bay: The current and proposed route has to cross a stream at the beach at Treyarnon Bay. While often presenting no problems, at high tides and/or in westerly gales and especially following heavy rain this stream can be very difficult to cross, with the water level above boot height for a distance of approximately 9 metres. This is a particular problem out of the summer season, when the low water temperature combined with the high water level creates an unwelcome barrier. It is accepted that a bridge is not a practical option here but stepping stones would be a feasible solution. This option was rejected because they would preclude use by those with mobility problems and because they can be moved or damaged by storm activity. In response, it may be said that those with mobility issues cannot cross the stream without the stepping stones either, while others would be able to do so, which is not possible at present. The replacement or repair of stones following a storm should not present an unsurmountable problem. Given the potential benefits and the minor disadvantages stones would address this problem appropriately.

**Natural England's comments**

We agree that the stream can be challenging to cross in some conditions but do not agree that stepping stones are a viable solution to the problem. We explain this position below. Unfortunately, there is no readily available alternative to the stream crossing so we maintain that our proposal is the best available in the circumstances.

The options for a footbridge or boardwalk were explored with the Access Authority but were judged to be unsuitable because of moving sand dunes and the fluctuating width of the stream. Stepping stones were also considered but the Access Authority advised against their use as they would have to be large and numerous due to the frequently changing route of the stream and they would impede water flow from the stream and tide. In addition, stepping stones can become covered by sand and algae or damaged by storm activity and so can pose a safety risk for users.

At present, walkers tip-toe or wade across the stream, which whilst cold, is achievable (see documents A and B in section 5 below). There are other examples of where this method of crossing a watercourse is accepted along the South West Coast Path, e.g. Wonwell Beach in Devon.

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

- **Document A:** MCA/MNQ10/R/4/MNQ1031 – Photos of views of the proposed route across Treyarnon Bay at high tide following heavy winter rain. These accompanied the 'other' representation from the South West Coast Path Association.
- **Document B:** Relevant to MCA/MNQ10/R/1/MNQ0973 and MCA/MNQ10/R/4/MNQ1031 – Photo of the proposed route across Treyarnon Bay during the majority of the year. Document submitted by Natural England.

<b>Representation number:</b>	MCA/MNQ10/R/2/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum
<b>Route section(s) specific to this representation:</b>	Map MNQ10b; route section MNQ-10-S048
<b>Other reports within stretch to which this representation also relates:</b>	N/A

**Representation in full**

Porthcothan: The proposal to move the alignment away from the road to the beach will be beneficial both environmentally and in terms of road safety and is welcomed and supported. However, it does not include specific provision for crossing the stream, which may give rise to difficulties at the highest tides and/or after heavy rain. In such circumstances the current road route would have to be used. Signing should be provided to cater for this eventuality.

**Natural England's comments**

The current road route remains available for walkers during the rare occasions when the stream becomes difficult to cross. The access authority will erect signs directing walkers towards the road bridge in these circumstances. Section 10.2.22 of report MNQ10 outlines the proposed costs for the additional signage needed at this location.

**Relevant appended documents:** N/A

<b>Representation number:</b>	MCA/MNQ10/R/3/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum
<b>Route section(s) specific to this representation:</b>	Map MNQ10a; route section MNQ-10-S003
<b>Other reports within stretch to which this representation also relates:</b>	MNQ 2 (MNQ-2-S065), MNQ 4 (MNQ-4-S003), MNQ 8 (MNQ-8-S005; MNQ-8-S030; MNQ8S031), MNQ 9 (MNQ-9-S031)

**Representation in full**

There are a number of locations where changes and improvements to furniture are proposed. It is important that any such changes, and especially those identified above, do not inhibit use by mobility vehicles. Further, any such changes should actively improve the possibility of use by mobility vehicles where the surrounding nature of the route makes this feasible. This is especially the case adjacent to locations where such use is already encouraged and catered for.

**Natural England's comments**

All new infrastructure proposed in the Marsland Mouth to Newquay coastal access reports will comply with the British Standard 5709:2018 Gaps, Gates and Stiles. In terms of the new infrastructure proposed in report MNQ10, the existing stone stile will be replaced by a pedestrian gate to facilitate access by less mobile users, in particular off-road mobility scooter riders (see section 10.2.10 and map MNQ10a).

**Relevant appended documents:** N/A

<b>Representation number:</b>	MCA/MNQ10/R/9/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	MNQ-10-S048 and S049
<b>Other reports within stretch to which this representation also relates:</b>	N/A

**Representation in full**

Porthcothan: We strongly support routing the path across the Towans as proposed in the Report, rather than along the road, for the reasons given in the report. The new route does require a crossing of the stream and there is no proposal to provide a bridge or stepping stones. We suggest that consideration should be given to providing a means of crossing, suitable for average winter water levels. The road bridge remains an alternative for exceptional water flows.

**Natural England's comments**

We welcome the positive engagement from the Ramblers' Association during the development of our proposals and the supportive comment in its representation.  
New signs will be erected to inform walkers that the road route is available for users during occasions when the stream becomes difficult to cross. Section 10.2.22 of report MNQ10 outlines the proposed costs for the additional signage to be installed at this location.

**Relevant appended documents:** N/A

<b>Representation number:</b>	MCA/MNQ10/R/10/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	MNQ-10-S078 and S079
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Pentire Steps: We welcome the proposed designation of coastal margin landward of the path. This field has been a useful permissive access area for the public for some time and enhances the experience of the coast. It is in an Area of Outstanding Natural Beauty.	
<b>Natural England's comments</b>	
We welcome the positive engagement from the Ramblers' Association during the development of our proposals and the supportive comments in its representation. We have no further comments about the representation.	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/MNQ10/R/11/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	Map MNQ10e; MNQ-10-S112
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Mawgan Porth: We welcome the proposed designation of coastal margin landward of the path. Although a fairly small area, it has a strongly coastal character, has been used freely by the public for many years and part has a designation of Area of Great Landscape Value.	
<b>Natural England's comments</b>	
We welcome the positive engagement from the Ramblers' Association during the development of our proposals and the supportive comment in its representation. We have no further comments about the representation.	
<b>Relevant appended documents:</b> N/A	
<b>Representation number:</b>	MCA/stretch/R/2/MNQ1033
<b>Organisation/ person making representation:</b>	Environment Agency

<b>Route section(s) specific to this representation:</b>	Whole stretch
<b>Other reports within stretch to which this representation also relates:</b>	MNQ1 - MNQ11
<b>Representation in full</b>	
Please can we make the below general comments:	
<ol style="list-style-type: none"> <li>1. We would like to highlight that works within 16m of a Main River or a flood defence may require an Environmental Permit for Flood Risk Activities.</li> <li>2. The proposals are broadly supported by the Cornwall and Isles of Scilly Shoreline Management Plan (2011) which includes maintaining a continuous coastal route and improved coastal access as core management objectives. At the moment we are seeing quite unprecedented impacts on the coast path in Cornwall, due partly to on-going erosion by waves and high tides of course, but also it's highly likely that the prolonged rainfall we've had (following a hot, dry summer), is causing destabilisation, land slips and cliff falls along some of the softer geology frontages. Added to these factors, (and especially along the more urbanised frontages such as Newquay), development pressure close to the cliff edge also poses a risk to the long-term sustainability of the route.</li> </ol>	
<b>Natural England's comments</b>	
<p>We welcome the positive engagement from the Environment Agency during the development of our proposals. Within the Marsland Mouth to Newquay Coastal Access proposals there are no works within 16m of a main river or a flood defence.</p> <p>The rollback proposals outlined in the MNQ10 report, tables 10.3.1 and 10.3.3, will enable the coast path to be adjusted more easily where it is affected by weather and wave action.</p>	
<b>Relevant appended documents:</b> N/A	

### ***Other representations***

<b>Representation ID:</b>	MCA/MNQ10/R/4/MNQ1031
<b>Organisation/ person making representation:</b>	South West Coast Path Association
<b>Name of site:</b>	Treyarnon Bay
<b>Report map reference:</b>	MNQ10a
<b>Route sections on or adjacent to the land:</b>	MNQ-10-S010 and MNQ-10-S011
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b>	
<p>Treyarnon Bay: Stepping stones over the stream, running across the beach and the proposed route, should be considered to facilitate passage during winter periods. [See document A in section 5 below].</p> <p><i>Note: this is a duplicate of the 'full' representation from the Cornwall Countryside Access Forum (MCA/MNQ10/R/1/MNQ0973)</i></p>	
<b>Natural England's comment:</b>	
<p>We agree that the stream can be challenging to cross in some conditions but do not agree that stepping stones are a viable solution to the problem. We explain this position below. Unfortunately, there is no readily available alternative to the stream crossing so we maintain that our proposal is the best available in the circumstances.</p>	

The options for a footbridge or boardwalk were explored with the Access Authority but were judged to be unsuitable because of moving sand dunes and the fluctuating width of the stream. Stepping stones were also considered but the Access Authority advised against their use as they would have to be large and numerous due to the frequently changing route of the stream and they would impede water flow from the stream and tide. In addition, stepping stones can become covered by sand and algae or damaged by storm activity and so can pose a safety risk for users.

At present, walkers tip-toe or wade across the stream, which whilst cold, is achievable (see documents A and B in section 5 below). There are other examples of where this method of crossing a watercourse is accepted along the South West Coast Path, e.g. Wonwell Beach in Devon.

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

- **Document A:** MCA/MNQ10/R/4/MNQ1031 – Photos of views of the proposed route across Treyarnon Bay at high tide following heavy winter rain. These accompanied the ‘other’ representation from the South West Coast Path Association.
- **Document B:** Relevant to MCA/MNQ10/R/1/MNQ0973 and MCA/MNQ10/R/4/MNQ1031 – Photo of the proposed route across Treyarnon Bay during the majority of the year. Document submitted by Natural England.

<b>Representation ID:</b>	MCA/MNQ10/R/5/MNQ1031
<b>Organisation/ person making representation:</b>	South West Coast Path Association
<b>Name of site:</b>	Porthcothan
<b>Report map reference:</b>	MNQ10b
<b>Route sections on or adjacent to the land:</b>	MNQ-10-S048
<b>Other reports within stretch to which this representation also relates</b>	N/A

**Summary of representation:**

Porthcothan: The proposed realignment away from the road to the beach is welcomed and supported. Signage should be provided that directs walkers towards the road bridge crossing during occasions when the stream cannot be easily crossed.

*Note: this is a duplicate of the ‘full’ representation from the Cornwall Countryside Access Forum (MCA/MNQ10/R/2/MNQ0973)*

**Natural England’s comment:**

We welcome the positive engagement from the South West Coast Path Association during the development of our proposals and the supportive comments in its representation.

New signs will be erected to inform walkers that the road route is available for users during occasions when the stream becomes difficult to cross. Section 10.2.22 of report MNQ10 outlines the proposed costs for the additional signage to be installed at this location.

**Relevant appended documents:** N/A

<b>Representation ID:</b>	MCA/MNQ10/R/6/MNQ0907
<b>Organisation/ person making representation:</b>	[Redacted]
<b>Name of site:</b>	Porthcothan



<b>Report map reference:</b>	MNQ10b
<b>Route sections on or adjacent to the land:</b>	MNQ-10-S050
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b> Porthcothan: The 'tunnel' of vegetation surrounding the steps leading from the beach, through which the new route will pass, has great aesthetic and nature value, and should therefore be kept.	
<b>Natural England's comment:</b> The majority of the vegetation will be retained, with just some light trimming to increase the head height within the 'tunnel'.	
<b>Relevant appended documents (see Section 5):</b> <b>Document C:</b> Relevant to MCA/MNQ10/R/6/MNQ0907 and MCA/MNQ10/R/7/MNQ0907 – Photo of the 'tunnel of vegetation' referred to in the representations. Document submitted by Natural England.	

<b>Representation ID:</b>	MCA/MNQ10/R/7/MNQ0907
<b>Organisation/ person making representation:</b>	[Redacted]
<b>Name of site:</b>	Porthcothan
<b>Report map reference:</b>	MNQ10b
<b>Route sections on or adjacent to the land:</b>	MNQ-10-S050
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b> Porthcothan: The bottom steps of the path leading from the beach need repairing, and the foliage above should be trimmed with care as the 'tunnel' is enjoyed by all.	
<b>Natural England's comment:</b> Paragraphs 10.2.11 and 10.2.22 of report MNQ10 refer to improvements to the stone steps leading from the beach. We would fund these as part of the establishment works if the Secretary of State approves the route. The majority of the vegetation will be retained, with just some light trimming to increase the head height within the 'tunnel'.	
<b>Relevant appended documents (see Section 5):</b> <b>Document C:</b> Relevant to MCA/MNQ10/R/6/MNQ0907 and MCA/MNQ10/R/7/MNQ0907 – Photo of the 'tunnel of vegetation' referred to in the representations. Document submitted by Natural England.	

<b>Representation ID:</b>	MCA/MNQ10/R/8/MNQ0907
<b>Organisation/ person making representation:</b>	[Redacted]
<b>Name of site:</b>	Porthcothan
<b>Report map reference:</b>	MNQ10b

<b>Route sections on or adjacent to the land:</b>	MNQ-10-S050 to MNQ-10-S057
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b> Porthcothan: The existing cliff path must be retained as, in the eventuality of roll-back occurring inland of the row of houses, there is no public right of way or way of access at either end of Cliff Road.	
<b>Natural England's comment:</b> We note the comment about a lack of public rights of way to use in the event of any future roll-back measures which may be introduced with the Coastal Access Programme. We are not in a position to clearly outline where the path may roll-back to, until such a time comes when these measures are needed. As detailed in the Coastal Access report MNQ10, section 10.3.3, when the path needs to be adjusted we will choose a new route according to the circumstances at the time and the views of the current owners and occupiers of the affected land.	
<b>Relevant appended documents:</b> N/A	

# Length Report 11

## *Full representations*

<b>Representation number:</b>	MCA/MNQ11/R/1/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum
<b>Route section(s) specific to this representation:</b>	Map MNQ11d; MNQ-11-S073
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Porth: It is proposed to realign the route from the road to the head of the beach. This is an environmental improvement although it is noted that on rare occasions at the highest tides with onshore winds the route may become unavailable. It is suggested that signing of the current route be maintained to cater for these occasions.	
<b>Natural England's comments</b>	
We welcome the positive engagement from the Cornwall Countryside Access Forum during the development of our proposals and the supportive comment in their representation. We note their concern about the beach route becoming impassable on rare occasions; table 11.3.3. of report MNQ11 addresses this point by stating the current South West Coast Path route along the road will remain signposted and be available for use as an informal diversion. Section 11.2.30 also outlines the proposed new signage required at either end of Porth beach to inform walkers of their options.	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/MNQ11/R/2/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum
<b>Route section(s) specific to this representation:</b>	MNQ11e; MNQ-11-S085
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Glendorgal Hotel: The current and proposed route uses a suburban road with no sea views. Use of a headland west of the Glendorgal Hotel would offer excellent sea views and, given its location, would benefit many local residents as well as walkers. The headland has been excepted from normal Coastal Margin access provision on the grounds that it is used as an event venue by the nearby hotel. However, use of the seaward edge of the headland for the route, suitably fenced from the inland area if felt necessary, would bring considerable benefit without being detrimental to use of the area by the hotel. It will be noted that the nature of the headland is of rough grassland, not a domesticated garden character. This route would appropriately fulfil the requirements of the Coastal Access scheme.	
<b>Natural England's comments</b>	

In our early engagement with the hotel we were hopeful that some form of public access to the headland could be provided. However, as discussions with the hotel management progressed we realised the impact on their business would be significant. As outlined in section 11.2.16 of report MNQ11, the hotel maintains the headland as a private area available exclusively for paying guests and those hiring the grounds for private functions. This asset is a valuable unique selling point for the hotel in a very competitive local market. We therefore concluded that public access under the coastal access rights would not be compatible with the commercial operation of the site.

In addition to the above, the suggestion in the representation regarding potentially routing the ECP around just the seaward edge of the headland was not deemed practical; the only means of access (entry and exit) to the headland is via the hotel's private driveway which leads to their carpark and reception area which is likely to fall within the excepted land category. There are no other ways to access the headland on foot from the east or west (see document A in section 5 below). We have therefore proposed that the route of the ECP follows the existing South West Coast Path along the pavement and that access to the Glendorgal Hotel grounds ('the headland') be excluded all year-round by direction under section 24 of the Countryside and Rights of Way Act 2000 (CROW), see document B in section 5 below. The headland is therefore not classed as excepted land as inferred by the comment in the representation.

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

- **Document A:** Shows Glendorgal Hotel and its headland.
- **Document B:** Shows proposed area of exclusion for commercial activities S24

<b>Representation number:</b>	MCA/MNQ11/R/3/MNQ0973
<b>Organisation/ person making representation:</b>	Cornwall Countryside Access Forum
<b>Route section(s) specific to this representation:</b>	Map MNQ11e; MNQ-11-S089
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Barrowfields: The current SWCP alignment follows the cliff edge at Barrowfields. The proposed alignment cuts across the centre of the park area and follows adjacent to the road on its landward side. It is accepted that the current line would still be available to the public, but it seems illogical for the most coastal line, and the most environmentally satisfactory, not to be used.	
<b>Natural England's comments</b>	
Based on the comments there appears to be a confusion over the current alignment of the South West Coast Path. There is a public footpath more seaward of the proposed route however as shown in Document C (section 5 below), the current walked route of the SWCP ('the national trail') does cut diagonally across the Barrowfields area. This desire line is the route we propose the ECP to follow. This proposal is in keeping with section 4.3.2 of the Coastal Access Scheme which states: 'People using the trail should not have to follow an indented coastline slavishly. The trail needs in general to be close to the sea and to offer sea views but also needs to enable people to make reasonable progress if their key aim is an onward walk around the coast'. In addition, the Coastal Access Scheme (section 4.7.1) states that 'where there is an existing national trail along the coast - or another clear walked line along the coast, whatever its status - we normally propose to adopt it as the line for the England Coast Path'.	
The whole of the headland of Barrowfields falls within the coastal margin and will therefore remain accessible to walkers as part of the seaward spreading room.	
<b>Relevant appended documents (see section 5):</b>	
□ <b>Document C:</b> Shows Barrowfields and the current walked route of the SWCP.	

<b>Representation number:</b>	MCA/MNQ11/R/7/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	Map MNQ11a; MNQ-11-S017 to 24
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Trevarrian: We welcome the proposed designation of coastal margin landward of the path which will allow the public to enjoy the coast over a wider area. The land has a designation of Area of Great Landscape Value.	
<b>Natural England's comments</b>	
We welcome the positive engagement from the Ramblers' Association during the development of our proposals and the supportive comment in its representation. We have no further comment about this representation.	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/MNQ11/R/8/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	Maps MNQ11c and 11d; MNQ-11-S060, 61, 62
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Whipsiderry: We welcome the proposed route of the path along these sections. This route has been walked by the public for a long period of time. The Ramblers' Association applied to Cornwall Council in 2015 for a definitive map modification order to add the path to the definitive map and statement as a public footpath but over 4 years later the application has not yet been determined by the Council.	
<b>Natural England's comments</b>	
We welcome the positive engagement from the Ramblers' Association during the development of our proposals and the supportive comment in its representation. We have no further comment about this representation.	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/MNQ11/R/9/MNQ0975
<b>Organisation/ person making representation:</b>	Ramblers' Association, Cornwall
<b>Route section(s) specific to this representation:</b>	Map MNQ11d; MNQ-11-S073

<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
Porth: We welcome the proposed route of the path along the back of the beach which is far preferable to following the busy road. Advantages are that it is free of vehicular traffic, has much better views of the sea and is closer to it and is more direct.	
<b>Natural England's comments</b>	
We welcome the positive engagement from the Ramblers' Association during the development of our proposals and the supportive comment in its representation. We have no further comment about this representation.	
<b>Relevant appended documents:</b> N/A	

<b>Representation number:</b>	MCA/stretch/R/2/MNQ1033
<b>Organisation/ person making representation:</b>	Environment Agency
<b>Route section(s) specific to this representation:</b>	Whole stretch
<b>Other reports within stretch to which this representation also relates:</b>	MNQ1 - MNQ11
<b>Representation in full</b>	
Please can we make the below general comments: <ol style="list-style-type: none"> <li>1. We would like to highlight that works within 16m of a Main River or a flood defence may require an Environmental Permit for Flood Risk Activities.</li> <li>2. The proposals are broadly supported by the Cornwall and Isles of Scilly Shoreline Management Plan (2011) which includes maintaining a continuous coastal route and improved coastal access as core management objectives. At the moment we are seeing quite unprecedented impacts on the coast path in Cornwall, due partly to on-going erosion by waves and high tides of course, but also it's highly likely that the prolonged rainfall we've had (following a hot, dry summer), is causing destabilisation, land slips and cliff falls along some of the softer geology frontages. Added to these factors, (and especially along the more urbanised frontages such as Newquay), development pressure close to the cliff edge also poses a risk to the long-term sustainability of the route.</li> </ol>	
<b>Natural England's comments</b>	
We welcome the positive engagement from the Environment Agency during the development of our proposals. Within the Marsland Mouth to Newquay Coastal Access proposals there are no works within 16m of a main river or a flood defence. The rollback proposals outlined in the MNQ11 report, tables 11.3.1 and 11.3.4, will enable the coast path to be adjusted more easily where it is affected by weather and wave action.	
<b>Relevant appended documents:</b> N/A	

### **Other representations**

<b>Representation ID:</b>	MCA/MNQ11/R/4/MNQ1031
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<b>Organisation/ person making representation:</b>	South West Coast Path Association
<b>Name of site:</b>	Porth
<b>Report map reference:</b>	MNQ11d
<b>Route sections on or adjacent to the land:</b>	MNQ-11-S073
<b>Other reports within stretch to which this representation also relates</b>	N/A
<p><b>Summary of representation:</b>  Porth: The path realignment from the road to the head of the beach is an environmental improvement. It is suggested that sign-posting of the current road route be maintained to cater for occasions when the beach route is impassable due to high tides.</p> <p><i>Note: this is a duplicate of the 'full' representation from the Cornwall Countryside Access Forum (MCA/MNQ11/R/1/MNQ0973)</i></p>	
<p><b>Natural England's comment:</b>  We welcome the positive engagement from the South West Coast Path Association during the development of our proposals and the supportive comment in their representation.  We note their concern about the beach route becoming impassable on rare occasions; table 11.3.3. of report MNQ11 addresses this point by stating the current South West Coast Path route along the road will remain signposted and be available for use as an informal diversion. Section 11.2.30 also outlines the proposed new signage required at either end of Porth beach to inform walkers of their options.</p>	
<b>Relevant appended documents:</b> N/A	

<b>Representation ID:</b>	MCA/MNQ11/R/5/MNQ1031
<b>Organisation/ person making representation:</b>	South West Coast Path Association
<b>Name of site:</b>	Glendorgal Hotel
<b>Report map reference:</b>	MNQ11e
<b>Route sections on or adjacent to the land:</b>	MNQ-11-S085
<b>Other reports within stretch to which this representation also relates</b>	N/A
<p><b>Summary of representation:</b>  Glendorgal Hotel: The current and proposed route uses a suburban road with no sea views. Use of the headland west of the Hotel would offer excellent sea views and fulfil the requirements of the Coastal Access scheme.</p> <p><i>Note: this is a duplicate of the 'full' representation from the Cornwall Countryside Access Forum (MCA/MNQ11/R/2/MNQ0973)</i></p>	

**Natural England's comment:**

In our early engagement with the hotel we were hopeful that some form of public access to the headland could be provided. However, as discussions with the hotel management progressed we realised the impact on their business would be significant. As outlined in section 11.2.16 of report MNQ11, the hotel maintains the headland as a private area available exclusively for paying guests and those hiring the grounds for private functions. This asset is a valuable unique selling point for the hotel in a very competitive local market. We therefore concluded that public access under the coastal access rights would not be compatible with the commercial operation of the site.

In addition to the above, the suggestion in the representation regarding potentially routing the ECP around just the seaward edge of the headland was not deemed practical; the only means of access (entry and exit) to the headland is via the hotel's private driveway which leads to their carpark and reception area which is likely to fall within the excepted land category. There are no other ways to access the headland on foot from the east or west (see document A in section 5 below).

We have therefore proposed that the route of the ECP follows the existing South West Coast Path along the pavement and that access to the Glendorgal Hotel grounds ('the headland') be excluded all year-round by direction under section 24 of the Countryside and Rights of Way Act 2000 (CROW), see document B in section 5 below. The headland is therefore not classed as excepted land as inferred by the comment in the representation.

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

- **Document A:** Shows Glendorgal Hotel and its headland
- **Document B:** Shows proposed area of exclusion for commercial activities S24

<b>Representation ID:</b>	MCA/MNQ11/R/6/MNQ1031
<b>Organisation/ person making representation:</b>	South West Coast Path Association
<b>Name of site:</b>	Barrowfields
<b>Report map reference:</b>	MNQ11e
<b>Route sections on or adjacent to the land:</b>	MNQ-11-S089
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b>	
Barrowfields: A more cliff edge route should be used rather than the proposed alignment cutting across the centre of the park area and following adjacent to the road on its landward side.	
<i>Note: this is a duplicate of the 'full' representation from the Cornwall Countryside Access Forum (MCA/MNQ11/R/3/MNQ0973)</i>	
<b>Natural England's comment:</b>	
Based on the comments there appears to be a confusion over the current alignment of the South West Coast Path. There is a public footpath more seaward of the proposed route however as shown in Document C (section 5 below), the current walked route of the SWCP ('the national trail') does cut diagonally across the Barrowfields area. This desire line is the route we propose the ECP to follow.	



This proposal is in keeping with section 4.3.2 of the Coastal Access Scheme which states: 'People using the trail should not have to follow an indented coastline slavishly. The trail needs in general to be close to the sea and to offer sea views but also needs to enable people to make reasonable progress if their key aim is an onward walk around the coast'. In addition, the Coastal Access Scheme (section 4.7.1) states that 'where there is an existing national trail along the coast - or another clear walked line along the coast, whatever its status - we normally propose to adopt it as the line for the England Coast Path'.

The whole of the headland of Barrowfields falls within the coastal margin and will therefore remain accessible to walkers as part of the seaward spreading room.

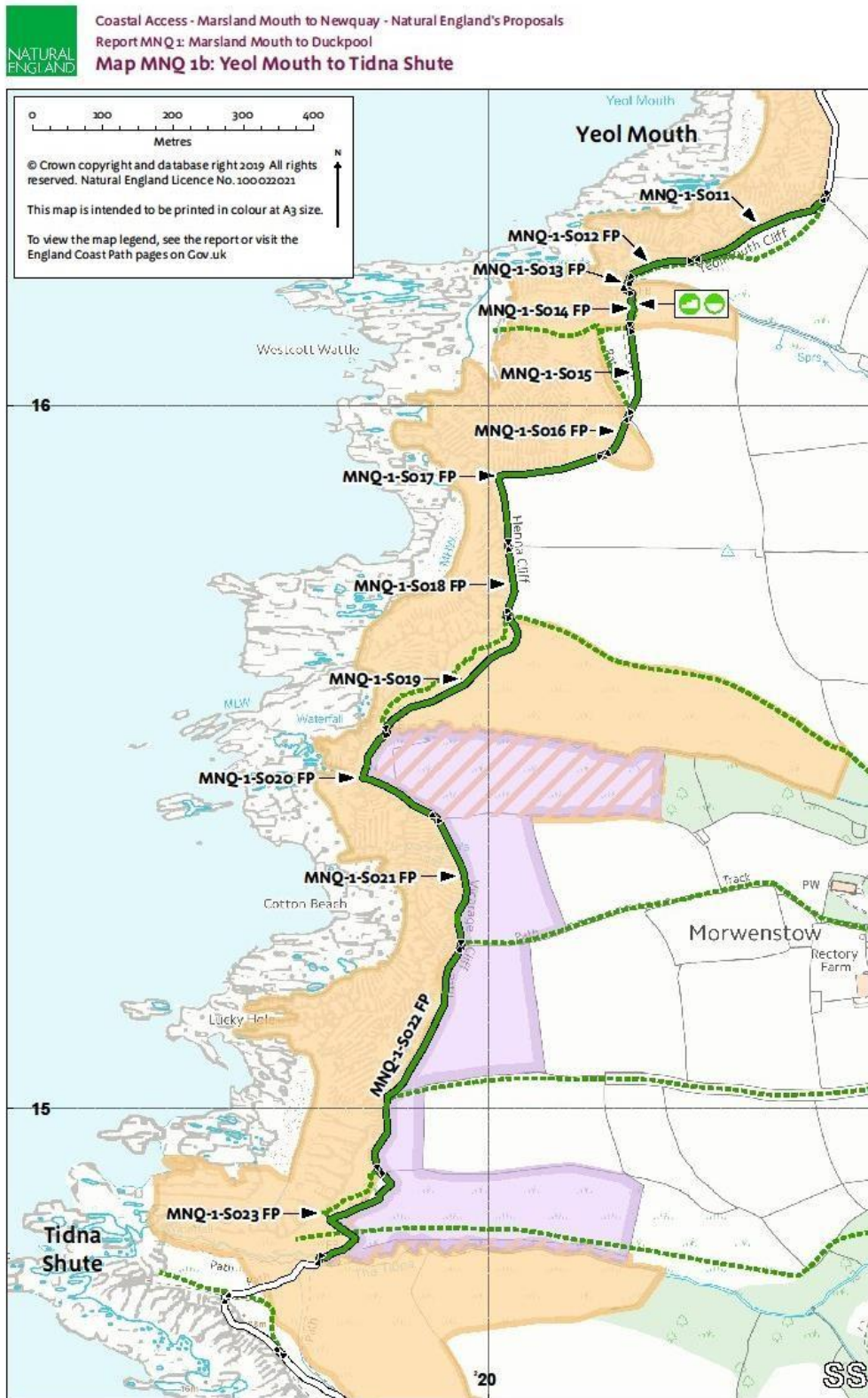
**Relevant appended documents (see Section 5):**

**Document C:** Shows Barrowfields and the current walked route of the SWCP.

# 5. Supporting documents

Length 1

Document A: MCA/MNQ1/R/2/MNQ0975: Revised map MNQ1b

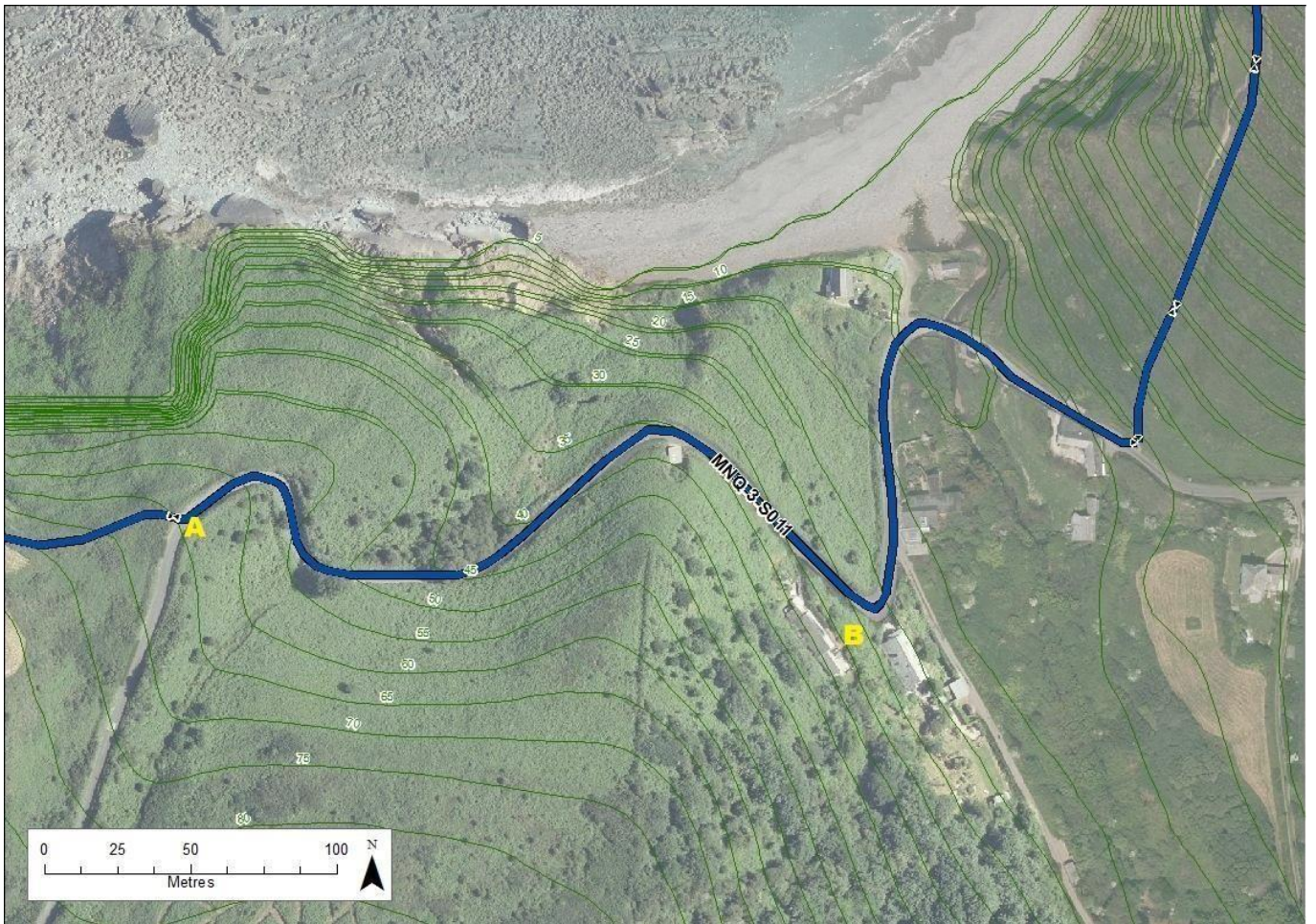


Document B: MCA/MNQ1/R/3/MNQ0975: Revised map MNQ1c



### Length 3

Document A: MCA/MNQ3/R/3/MNQ0973 & MCA/MNQ3/R/6/MNQ1031 - shows the contours of the ground landward of the road section MNQ-3-S011 between points A and B.

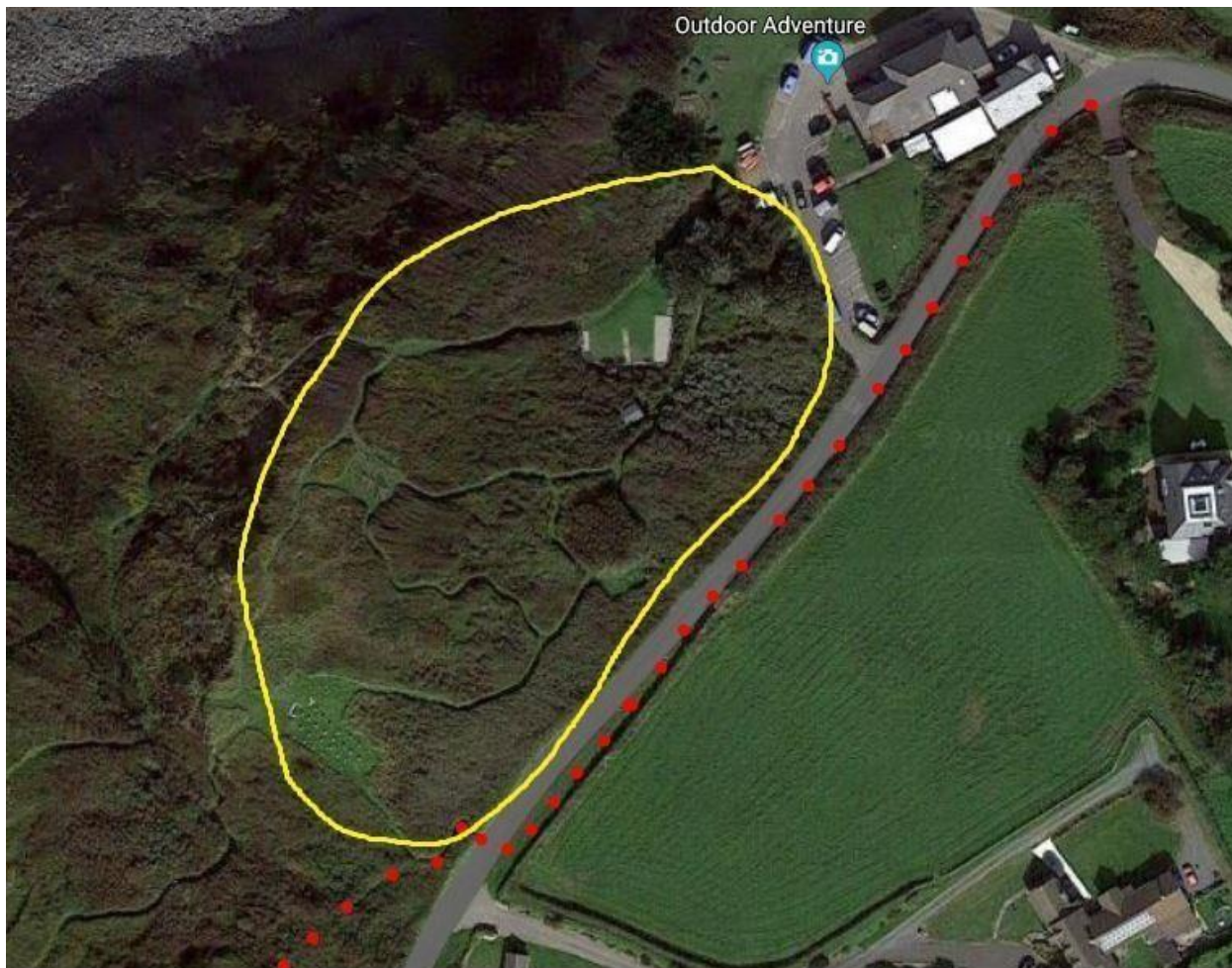


**Document B: MCA/MNQ3/R/7/MNQ0975 - Full representation from Ramblers' Association, Cornwall.  
Photographs showing proposed route along MNQ-3-S001.**



*Google Street View pictures (August 2016) showing dense gorse and limited distant view of the sea*

Document C: MCA/MNQ3/R/7/MNQ0975 Route section MNQ-3-S001. The line of the proposed ECP along the road and grass verge is indicated by red dots. The yellow line encloses the area used by the outdoor activity centre; camping areas and private paths used by their residents are evident.



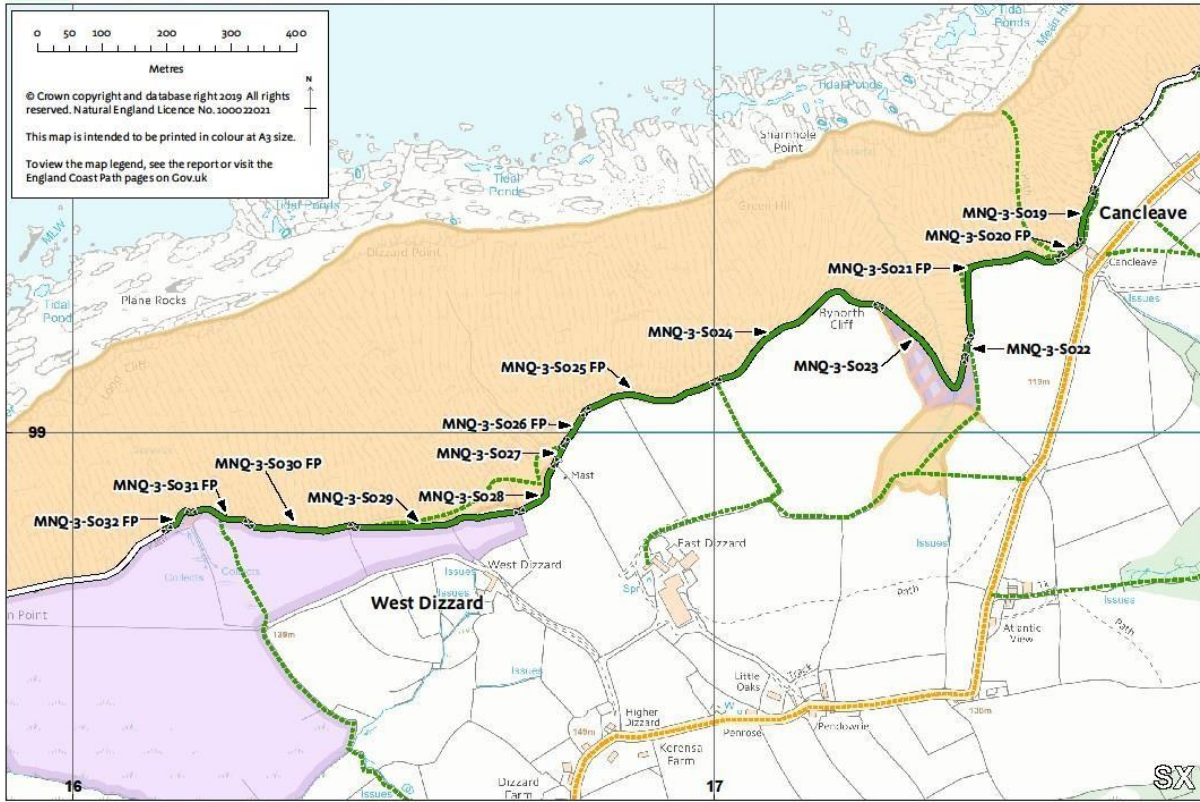
Document D: MCA/MNQ3/R/7/MNQ0975 – Route section MNQ-3-S001 showing grass verge



# Document E: MCA/MNQ3/R/8/MNQ0975 revised map MNQ3c



Coastal Access - Marsland Mouth to Newquay - Natural England's Proposals  
Report MNQ 3: Wanson Mouth to Crackington Haven  
Map MNQ 3c: Cancleave to West Dizzard



Map MNQ 3c: Cancleave to West Dizzard

Document F: MCA/MNQ3/R/8/MNQ0975 revised map MNQ3d



Coastal Access - Marsland Mouth to Newquay - Natural England's Proposals  
 Report MNQ 3: Wanson Mouth to Crackington Haven  
**Map MNQ 3d: West Dizzard to Cleave**



Map MNQ 3d: West Dizzard to Cleave



## Length 4

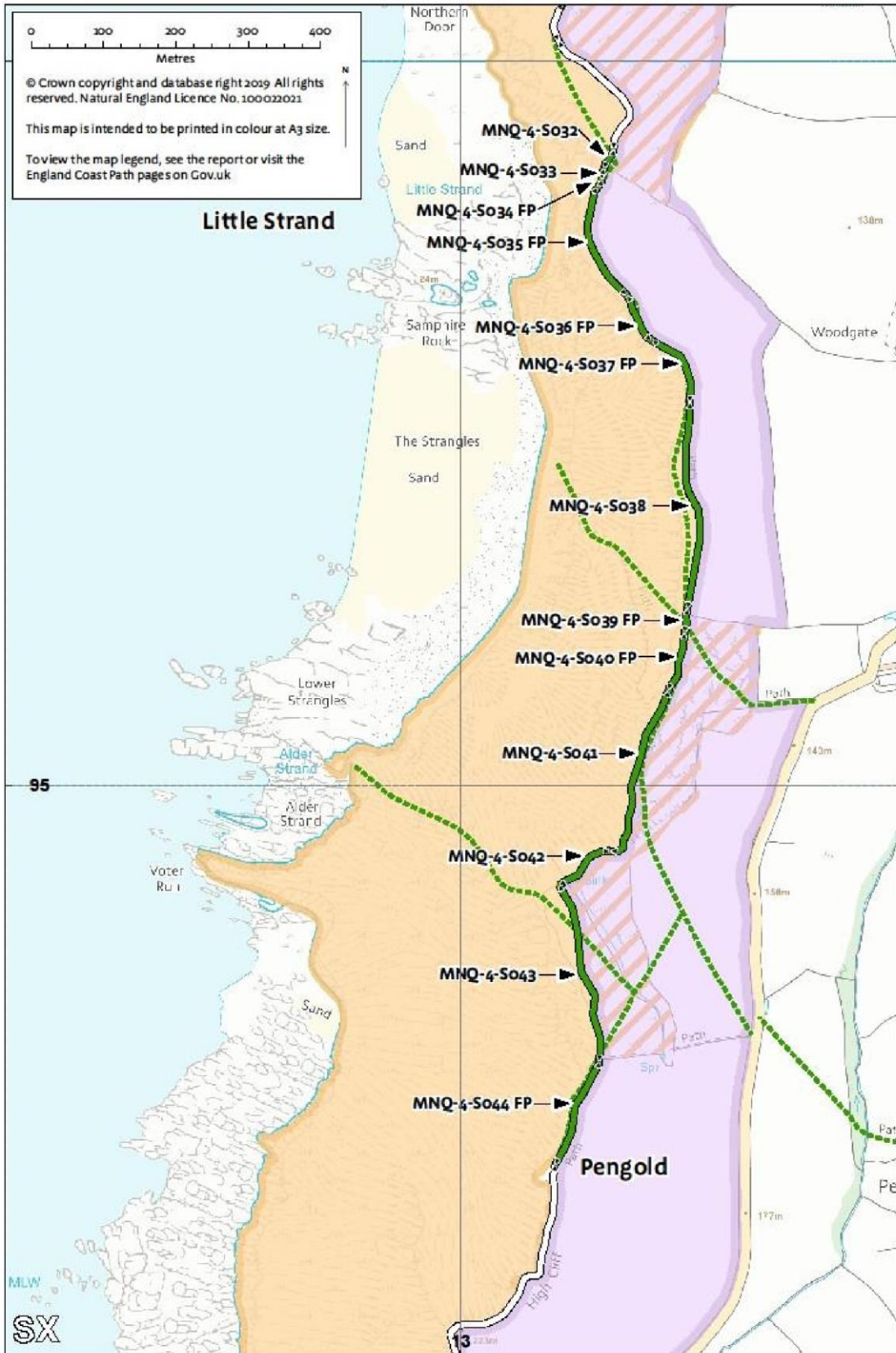
**Document A: MCA/MNQ4/R/2/MNQ0973** - Map shows the proposed route of ECP, the existing optional inland route and the section of steep steps referred to in the representation



Document B: MCA/MNQ4/R/5/MNQ0975 – Revised map MNQ4b



Coastal Access - Marsland Mouth to Newquay - Natural England's Proposals  
Report MNQ 4: Crackington Haven to Boscastle  
**Map MNQ 4b: Little Strand to Pengold**

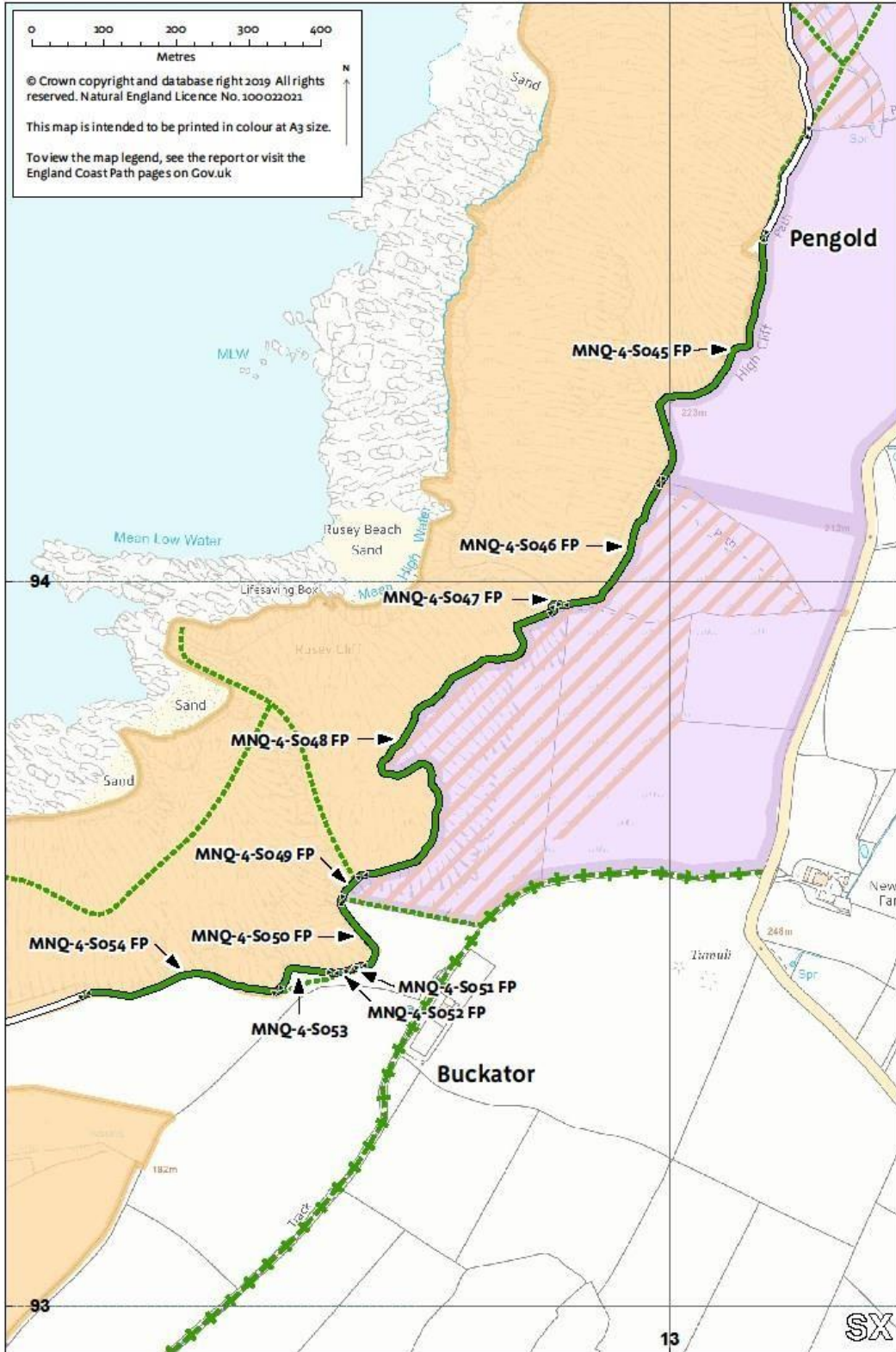


Map MNQ 4b: Little Strand to Pengold

Document C: MCA/MNQ4/R/5/MNQ0975 – Revised map MNQ4c



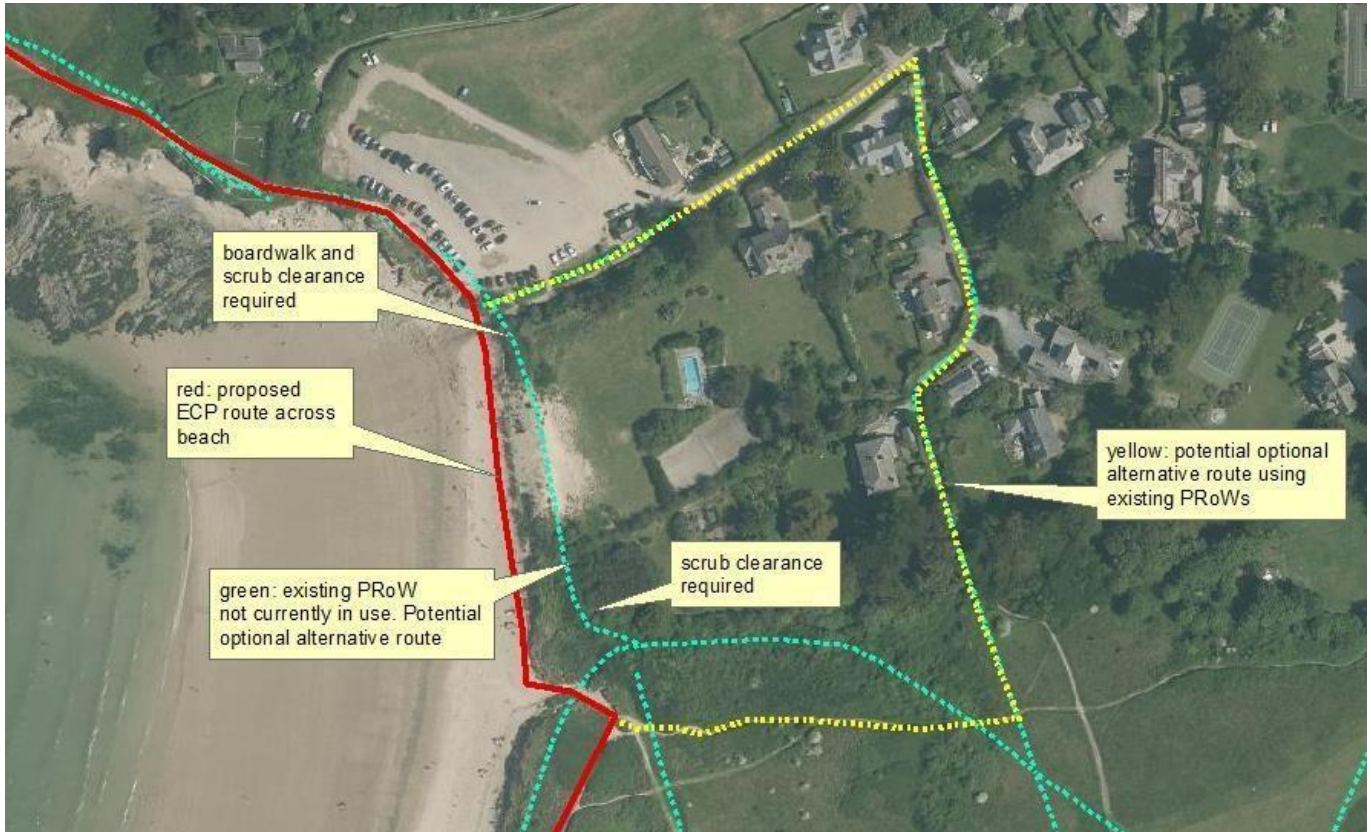
Coastal Access - Marsland Mouth to Newquay - Natural England's Proposals  
 Report MNQ 4: Crackington Haven to Boscastle  
**Map MNQ 4c: Pengold to Buckator**



Map MNQ 4c: Pengold to Buckator

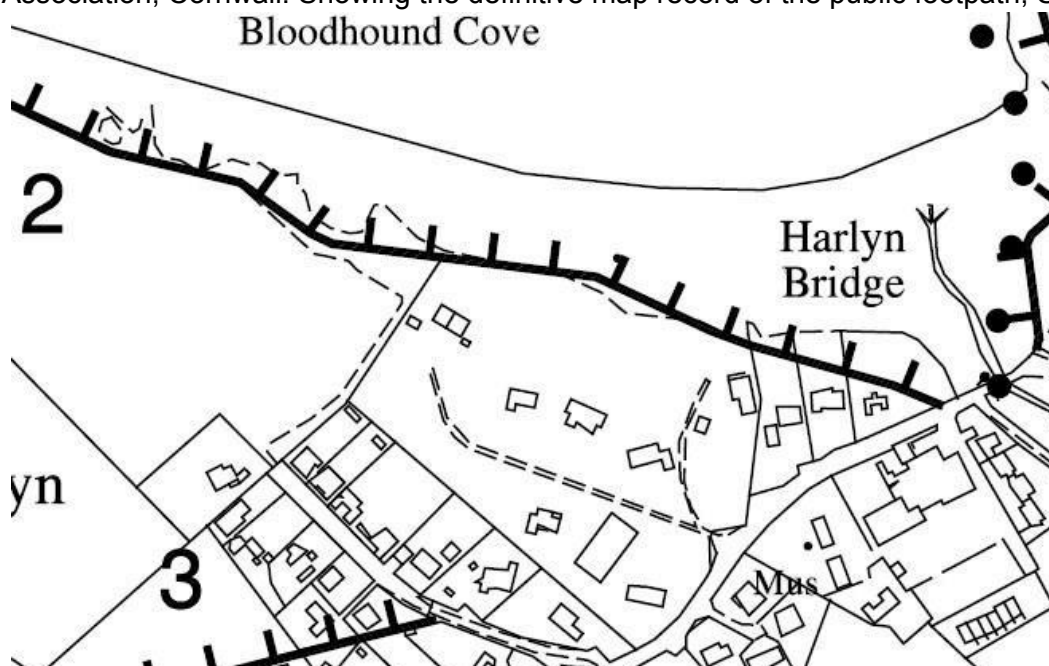
## Length 8

**Document A:** MCA/MNQ8/R/1/MNQ0973 & MCA/MNQ8/R/3/MNQ1031 – Map showing the normal proposed route of the ECP across the beach, the suggested optional alternative routes and the locations of establishment works. Map submitted by Natural England.



## Length 9

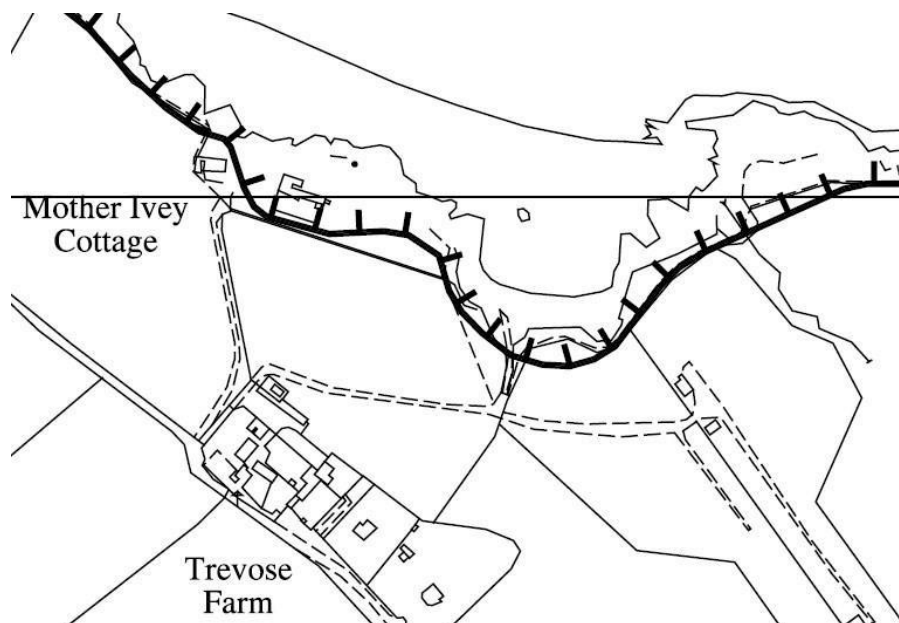
**Document A:** MCA/MNQ9/R/7/MNQ0975 – Map accompanying the full representation from the Ramblers' Association, Cornwall. Showing the definitive map record of the public footpath, St Merryn 2.



**Document B: MCA/MNQ9/R/7/MNQ0975** – Aerial photo showing the unused public footpath, St Merryn 2. Document submitted by Natural England.



**Document C: MCA/MNQ9/R/8/MNQ0975** – Map accompanying the full representation from the Ramblers' Association, Cornwall. Showing the definitive map record of the public footpath, St Merryn 2.

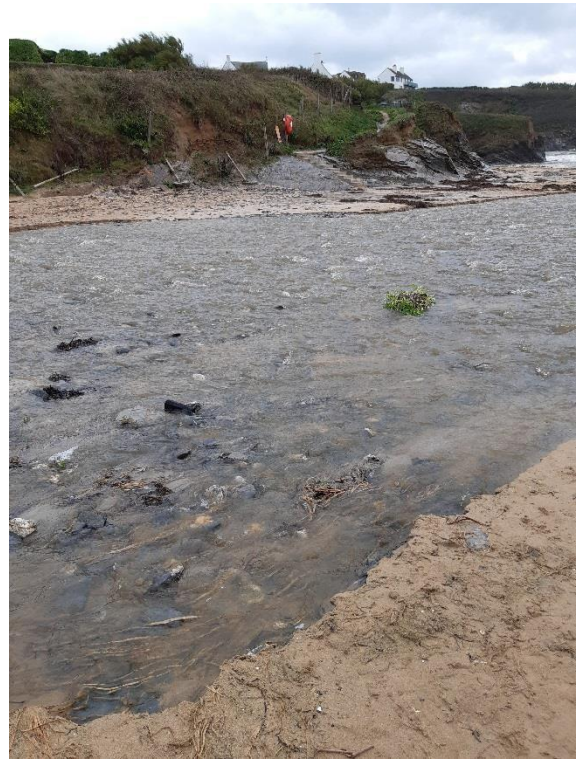


**Document D: MCA/MNQ9/R/8/MNQ0975** – Aerial photo showing the proposed route of the ECP and the unused public footpath, St Merryn 2. Document submitted by Natural England.



Length 10

**Document A: MCA/MNQ10/R/4/MNQ1031** – Photos of views of the proposed route across Treyarnon Bay at high tide following heavy winter rain. These accompanied the ‘other’ representation from the South West Coast Path Association.



**Document B: Relevant to MCA/MNQ10/R/1/MNQ0973 and MCA/MNQ10/R/4/MNQ1031** – Photo of the proposed route across Treyarnon Bay during the majority of the year. Document submitted by Natural England.



**Document C: Relevant to MCA/MNQ10/R/6/MNQ0907 and MCA/MNQ10/R/7/MNQ0907 – Photo of the 'tunnel of vegetation' referred to in the representations. Document submitted by Natural England.**



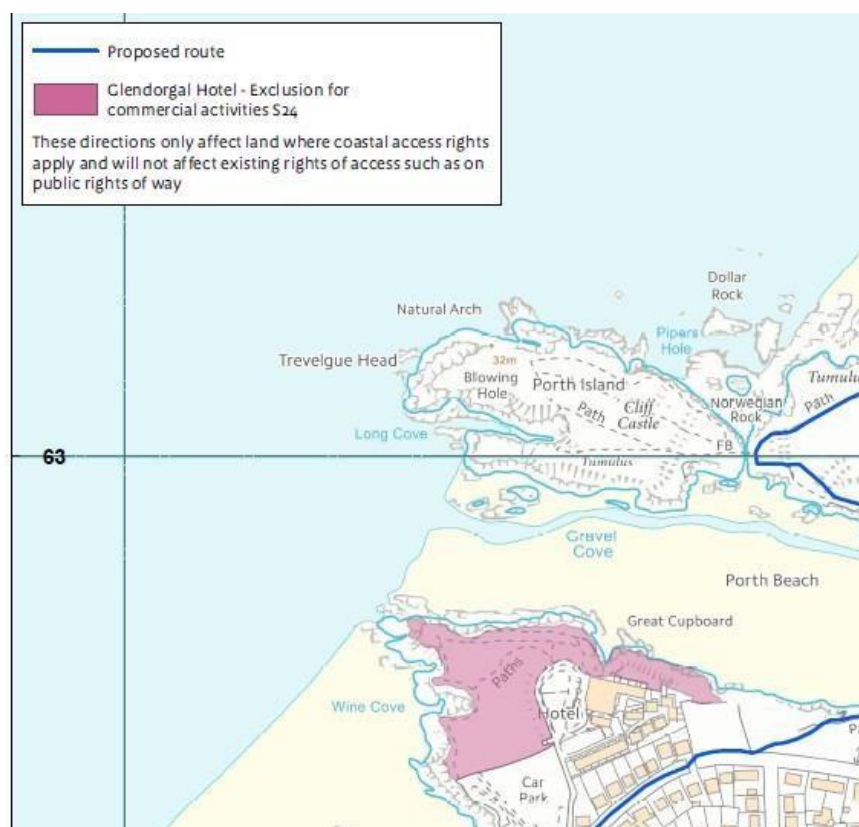


## Length 11

**Document A: Relevant to representations MCA/MNQ11/R/2/MNQ0973 and MCA/MNQ11/R/5/MNQ1031.** Shows Glendorgal Hotel and its headland (hashed area). The only means of access for walkers is along the hotel's private driveway (yellow dashed line).



**Document B: Relevant to representations MCA/MNQ11/R/2/MNQ0973 and MCA/MNQ11/R/5/MNQ1031.** Shows proposed area of exclusion for commercial activities S24.



**Document C: Relevant to representations MCA/MNQ11/R/3/MNQ0973 and MCA/MNQ11/R/6/MNQ1031.** Shows Barrowfields and the current walked route of the SWCP ('national trail').

- PRow / PROMOTED ROUTES
  - Cornwall\_PRow
  - PRow\_Defra
  - National\_Trails
- 

