

Coastal Access – *Iwade to Grain* lengths IGR1 to IGR3, IGR5, IGR7 and IGR9 to IGR12



Representations with Natural England's comments

August 2020

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1. Introduction

This document records the representations Natural England has received on the proposals in length reports IGR1 to IGR3, IGR5, IGR7 and IGR9 to IGR12 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 Iwade to Grain they are included here in so far as they are relevant to lengths IGR1 to IGR3, IGR5, IGR7 and IGR9 to IGR12 only.

2. Background

Natural England's compendium of reports setting out its proposals for improved access to the coast from Iwade to Grain, comprising an overview and twelve separate length reports, was

submitted to the Secretary of State on 15 January 2020. This began an eight-week period during which representations and objections about each constituent report could be made.

In total, Natural England received 19 representations pertaining to length reports IGR1 to IGR3, IGR5, IGR7 and IGR9 to IGR12, of which 11 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 eight 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 IGR1

Full representations

Representation number:	MCA/IGR1/R/2/IGR2397
Organisation/ person making representation:	Ramblers [Redacted], Coastal Access Officer for Kent
Route section(s) specific to this representation:	Report IGR 1
Other reports within stretch to which this representation also relates:	N/A
Representation in full	
The Ramblers fully support the proposed route along this section of the Coast Path.	
Natural England's comments	
We welcome the positive engagement from [redacted] during the development of our proposals and the supportive comment made by the Ramblers.	

Representation number:	MCA/IGR Stretch/R/1/IGR2405
Organisation/ person making representation:	Historic England [Redacted], Assistant Inspector of Ancient Monuments
Route section(s) specific to this representation:	Whole Stretch
Other reports within stretch to which this representation also relates:	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12. There are more specific comments on the four scheduled monuments which appear in reports IGR 6, IGR 8, IGR 9 and IGR 12.
Representation in full	
<p>Historic England are making a representation about this report as we are a statutory consultee, and advise in particular on proposals that affect designated monuments (e.g. scheduled monuments, listed buildings). Please find our advice and recommendations below.</p> <p>We do not have any objections to the Iwade - Grain proposal as we think it is in general a low impact proposal that will cause little to no harm to heritage significance. However the advice below does highlight those more historically sensitive areas of the route; whether other permissions/consents may be required for works in them (e.g. Scheduled Monument Consent); and advice on how to limit harm to the historic environment in general.</p> <p>The path as proposed passes through the following scheduled monuments:</p> <ul style="list-style-type: none"> • World War II Heavy Anti-aircraft gunsite (TS3) at Wetham Green, 460m north of Red Brick Cottage (List Entry Ref: 1020387) • Chatham Lines, section at Chatham Gun Wharf (List Entry Ref: 1021379) • Cockham Wood Fort (List Entry Ref: 1003362) • Coastal Artillery Defences on the Isle of Grain (List Entry Ref: 1019955) 	

The path also passes over or near the following listed structures:

- Passes over grade II Rochester Bridge (List Entry Ref: 1086431)
- Passes close to a number of grade II listed anti-tank cubes (List Entry Ref: 1393814) and pillboxes (List Entry Refs: 1393816 & 1393815) and the grade II Grain Crossing Signalling Box (List Entry Ref: 1415162)

The path also goes through the following conservation areas:

- Lower Halstow, Swale
- Upnor
- Chatham historic dockyard
- Brompton lines
- Star hill to Sun Pier, Medway
- Frindsbury and Manor Farm

The above summary provides an overview of all designated assets that have the potential to be impacted by the proposal (although we think the actual impact is likely to be low-nil).

In terms of the scheduled monuments, Scheduled Monument Consent (SMC) would only be required if any new installations (e.g. signage) are to be placed in the scheduled area; or if the introduction of new paths/use of existing paths through the scheduled area will involve any additions (e.g. new surfacing) or any ground disturbance (e.g. digging to create/resurface paths). If this is the case, Natural England will need to apply for SMC to Historic England in advance of any works in the scheduled areas commencing.

You should consult the local conservation officer with regards to impact upon the setting of grade II listed buildings or conservation areas. Finally, you should also consult the county archaeologist about impacts to non-designated archaeology.

Natural England's comments

We welcome the positive engagement from Historic England during the development of our proposals – and their supportive comments. Throughout this process we have consulted with Historic England, as well local officers at Kent County Council regarding Historic Environment Records (in line with para 4.9.5 Coastal Access Scheme) to ensure that our proposals would not have a detrimental effect on designated and local heritage assets.

Report IGR 1 does not contain any designated Scheduled Monuments or conservation areas, therefore no consents or further liaison with Historic England will be necessary prior to establishment of the proposals between Ridham Dock (Iwade) and Kingsferry Bridge.

Representation number:	MCA/IGR Stretch/R/5/IGR2394
Organisation/ person making representation:	The Kent County Council Public Rights of Way and Access Service, [redacted]
Route section(s) specific to this representation:	Whole stretch
Other reports within stretch to which this representation also relates:	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6 including more specific comments on IGR 4.

Representation in full

In broadest terms, the Kent County Council (KCC) Public Rights of Way (PRoW) and Access Service support the creation of the England Coast Path, recognising the benefits this new National Trail will bring to the County. The establishment of the England Coast Path will supplement the delivery of Kent's Rights of Way Improvement Plan by encouraging active lifestyles, providing sustainable travel choices and supporting the Kent economy.

Having worked closely with Natural England during the development of this stretch, we are grateful for the opportunity we have been given to input into this process. While it is disappointing to see the proposed trail has not being aligned closer to the sea in places, the reasons for the preferred route are understood given the wildlife and environmental constraints of the existing landscape. We also fully understand the difficulties that have been encountered when balancing public and private interests.

Natural England has acknowledged the existence of the Saxon Shore Way and proposed that the England Coast Path follows much of this route. While the Saxon Shore Way provides extensive opportunities to explore the North Kent Coast, the route does not always follow the principles of the Coastal Access Scheme. Further, the Saxon Shore Way was limited to passing along PRow and public highways when it was originally created in 1980. It is therefore pleasing to note that Natural England has taken the opportunity presented by the Coastal Access Scheme to create new public access and provide alternatives to the existing on road sections of the Saxon Shore Way.

Particular attention is drawn to the section of trail proposed on Map IGR 4b, where the Saxon Shore Way passes along the Sheerness Road. Natural England has acknowledged the advice from Kent Highways and understood that the Sheerness road is not suitable for a National Trail, with its expected levels of public use. The proposed trail alignment is welcomed as it would provide a safer off-road alternative to the existing Saxon Shore Way and adhere to the general principles of the Coastal Access Scheme.

The KCC PRow and Access Service look forward to working with Natural England in the future and delivering this stretch of the England Coast Path.

Natural England's comments

We welcome these supportive comments and the positive engagement from [redacted] during the development of our proposals.

We also appreciate KCC's acknowledgement of the considerations that are a necessary part of developing the England Coast Path proposals, including wildlife and environmental constraints, balancing public and private interests and assessing whether existing paths meet the principles of the Coastal Access Scheme.

Other representations

Representation ID:	MCA/IGR1/R/1/IGR2874
Organisation/ person making representation:	Kingsferry Boat Club [redacted]
Name of site:	Land owned by Kingsferry Boat Club
Report map reference:	Map IGR 1a
Route sections on or adjacent to the land:	IGR-1-S014 to IGR-1-S015
Other reports within stretch to which this representation also relates	N/A
Summary of representation: Kingsferry Boat Club (KBC) has historically suffered theft and damage to boats and equipment. KCB has therefore applied to Kent County Council (KCC) to divert the public footpath ZR88 to the edge of their landholdings. As a result of this, they want route sections IGR-1-S014 to IGR-1-S015 to be	

amended to follow the current alignment of ZR88 so that if, and when, KCC approves the diversion of ZR88, the Coast Path will be diverted along with it.

Natural England's comment:

During the development of the Coast Path proposals, we engaged regularly with Kingsferry Boat Club (KBC) to ensure that coastal access rights would not interfere in any significant way with their operational needs. At our last meeting in December 2018, the published route was agreed with the former secretary of the club, [redacted] (see document 5A). Natural England opted for the published route, with KCB support, as it is the most popular and accessible walked route on the ground given the easier gradient to ascend and descend the seawall.

Following the publication of the proposals, [redacted] informed us of his preference to modify route sections IGR-1-S014 and IGR-1-S015 to align with the current public footpath ZR88, along the seawall. His suggested modification is entirely within the landholdings of Kingsferry Boat Club and there will be no loss of coastal views. Whilst the proposed modification traverses a steeper bank than currently proposed, we consider the ZR88 public footpath route is a suitable route for walkers. Therefore, we support this suggested modification. Kent County Council (pers comm) also supports the modification.

Kingsferry Boat Club applied to divert the public footpath ZR88, in November 2019. If the diversion order is approved, there would be two managed paths in close proximity and it is likely that Natural England would consider a variation report to bring the England Coast Path into alignment with the new public footpath alignment. KBC would need to contact Natural England to discuss a variation of the England Coast Path to the new alignment of the public footpath.

We recommend that the Secretary of State should approve the proposal with the modification shown on amended Map IGR 1a v1.1, as shown on document 5B; and with the additional text shown below inserted into the proposal table IGR 1.3.1.

1.3.1 Section Details: Map IGR 1a – Ridham Dock (Iwade) to Kingsferry Bridge

1	2	3	4	5a	5b	5c	6
Map(s)	Route section number(s)	Current status of route section(s)	Roll-back proposed? (See Part 7 of Overview)	Landward margin contains coastal land type?	Proposal to specify landward boundary of margin (See maps)	Reason for landward boundary proposal	Explanatory notes
IGR 1a	IGR-1-S014*	Public footpath	No	Yes - bank			
IGR 1a	IGR-1-S015*	Public footpath	No	No			

Relevant appended documents (see Section 5):

5A: Site meeting notes, dated 24 December 2018

5B: Map IGR 1a v1.1 Proposed Modification to Route Sections IGR-1-S014 and IGR-1-S015

Representation ID:	MCA/IGRStretch/R/2/IGR2959
Organisation/ person making representation:	[Redacted]
Name of site:	Whole route
Report map reference:	Whole route
Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.

Summary of representation:

The reports only makes passing reference to cycling. Unlike other parts of the Thames and the Kent coast, there is no official cycling trail along the shoreline between Whitstable and Dartford. National Cycle Network 1 is mainly away from the shore, except in Riverside Country Park. The England Coast Path route should be open to cycling, unless there is a good reason otherwise. Barriers should be removed along the route and surfaces could be improved in the long term. Making the route better for cycling would make it better for disabled access.

Natural England's comment:

Right to cycle

In line with the Coastal Access duty to create clear and consistent public access rights along the coast for open-air recreation on foot, our reports to the Secretary of State set out proposals for a walking route only. Coastal access rights include most types of recreation on foot or by wheelchair including walking, climbing and picnicking. However, there are general restrictions on the scope of coastal access rights which are called "national restrictions", for example the coastal access rights do not normally include camping, horse riding or cycling. This does not prevent such recreational uses taking place by virtue of an existing right, with the landowner's permission or by traditional tolerance (sections 2.4.1 and 2.4.2 of the Coastal Access Scheme). Where there are existing higher rights along our proposed trail (such as the existence of bridleways, cycle tracks, public highway), we have highlighted those additional rights in the proposals table and associated maps within each of the 12 reports.

In preparing the report, we met with local stakeholders to explore any issues and opportunities the England Coast Path presented. This included the Kent Countryside Access Forum (KCAF) and Medway Local Access Forum, who did not raise any specific aspirations about establishing new cycling rights along this stretch of coast. We also raised the potential for the dedication of higher rights with land owners affected by the trail. Whether or not to dedicate higher rights in this way is a decision for the landowners, not Natural England.

Nonetheless, we note [redacted]'s points and have forwarded them to both the Medway and Kent Access Fora for their consideration, in relation to implementing their Rights of Way Improvement Plans. Any new rights to cycle along the England Coast Path in future would need to be negotiated with the relevant landowners before proceeding with either a direction to relax general restrictions, or a dedication under S16 of the CROW Act.

Barriers to access

In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.

Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with

reduced mobility, such as removing barriers to access such as replacing stiles with kissing gates or replacing kissing gates with gaps (section 4.3.10 of the Coastal Access Scheme). Land management requirements and local circumstances sometimes prohibit the removal of all gates, and we have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.

Representation ID:	MCA/IGRStretch/R/3/IGR0008
Organisation/ person making representation:	The Disabled Ramblers [Redacted]
Name of site:	Whole route
Report map reference:	Whole route
Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.
<p>Summary of representation:</p> <p>[Redacted] notes that it was really encouraging to read of the positive changes being proposed to improve access for mobility vehicles as well as why it is not possible to improve matters in certain places. [Redacted] appreciates that Natural England will consider more accessible options when change is made to some sections of the route in the near future.</p> <p>[Redacted] was also really pleased to read of the inclusion of some step-free routes that will be sign-posted to get around some unavoidable barriers and she thanks Natural England for our hard work on this, and for helping to open up the opportunities available to those with limited mobility.</p>	
<p>Natural England's comment:</p> <p><u>Accessibility</u></p> <p>We welcome the positive engagement from [redacted] during the development of our proposals and the supportive comments made by The Disabled Ramblers' Association.</p> <p>In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.</p> <p>Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access and leaving gaps or signposting step-free routes (section 4.3.10 of the Coastal Access Scheme). We have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.</p> <p>In regard to the mention of future changes to the route, this comment is likely to be related to the potential roll-back identified in the reports. With any new route, Natural England and the relevant Access Authority (Kent County Council) would seek to identify the most accessible route, balanced against the key principles described above, for the new trail alignment.</p>	

Length Report IGR2

Full representations

Representation number:	MCA/IGR2/R/1/IGR2397
Organisation/ person making representation:	Ramblers, [redacted]
Route section(s) specific to this representation:	Report IGR 2
Other reports within stretch to which this representation also relates:	N/A
Representation in full	
<p>We would prefer to see the route follow the sea wall around Chetney Marshes. While we fully recognise and support the need to avoid disturbance to birds and recognise the importance of Chetney Marshes we are not convinced that the number of walkers who would use this relatively remote route section would cause a serious problem. Deadmans Island has a macabre history and it is a great shame walkers will not be able to view it.</p> <p>Historically it is almost certain that there would have been public access along the sea wall. Public Footpath ZR88 extends to the North of the route and ends in a dead end which indicates there was a footpath here.</p> <p>We note that there is no mention in the Report or Habitats Regulations Assessment (HRA) of the disturbance to birds caused by the wildfowling and shooting that takes place in this area. Also, there is launching for power boats and jet skis adjacent to the Kings Ferry Bridge and the noise must cause disturbance.</p> <p>Several sections of the Coast Path in Kent follow the sea wall across or adjacent to SPA, Ramsar and SSSI sites without apparent significant problem.</p> <p>The Ramblers have been fully consulted throughout the preparation of the Report and I have had every opportunity to argue this case before. However, I am still not convinced that a few walkers would seriously impact on the bird population.</p>	
Natural England's comments	
<p>We have welcomed the positive engagement from the Ramblers during the development of our proposals.</p> <p><u>Route around Chetney Marshes</u></p> <p>In determining the proposed alignment, we considered a number of options in this area, as presented in Table 2.3.2 Other Options Considered of the report. These included aligning around the northern edge of Chetney Marshes, along the seawall. This option would have brought public benefits, including for the historical interest of Deadmans Island, as described in the representation. However new access was discounted here due to concerns over the potential impacts on wildlife.</p> <p>Chetney Marshes has been identified as an important breeding and wintering bird site in the southern Medway Estuary and forms a crucial part of the network of high tide roost sites especially when the saltmarsh islands are submerged during high spring tides.</p> <p>In the HRA, we concluded that new access around the Chetney Marshes seawall would result in disturbance to the important bird populations at all times of year, by affecting the birds' ability to feed or rest effectively on intertidal areas and roost sites in the winter, spring and autumn, with nesting affected in spring and summer on land adjacent to the seawall. As a result, new access was discounted here as we couldn't conclude that there would be no adverse impact on the bird populations of the Medway Estuary and Marshes Special Protection Area (SPA) and Ramsar site (as considered as part of the published HRA). The precautionary principle applies in such cases, if we cannot rule out a possible adverse effect, then the proposal cannot go ahead.</p>	

Public Footpath ZR88

We are unable to comment on whether public footpath ZR88 once extended along the seawall and around Chetney Marshes. At present, there are only very limited access rights along truncated rights of way north of the proposed trail, and the majority of Chetney Marshes is actively managed by the landowners to restrict public access. This is the existing situation upon which we consider the impacts of any new access on wildlife, within our HRA.

Other recreational activities in the area

A number of recreational activities already take place in the area covered by this report, as mentioned in the representation. These include wildfowling, jet skiing and boating, as well as cycling, walking and dog walking along the Saxon Shore Way. These are highlighted in the HRA as contributing to the existing distribution of bird population in the area (see p27 of the HRA). It is important that any new project, such as the England Coast Path, does not exacerbate the existing situation, especially on parts of the estuary with high levels of bird use, such as Chetney Marshes. Therefore, our HRA focusses on ensuring that our proposals do not create additional impact on the bird populations.

Coast path adjacent to designated sites

As the representation also mentions, there are several sections around the Medway Estuary where the proposed England Coast Path runs adjacent to designated sites. These are mostly sections that follow existing rights of way, where the internationally important bird population has co-existed alongside long-standing path use. Even in these locations, increasing the number of walkers as a result of the Coast Path, may still have negative impacts upon the bird populations, especially when climate change is exacerbating habitat availability, such as where rising sea levels flood out roosting, feeding and breeding grounds, so birds rely even more on suitable areas of higher land. This is why we also assess, in our HRA, the potential impacts of aligning the new, promoted England Coast Path along existing coastal footpaths.

In all the reports where we have proposed that the coast path follows seawalls across or adjacent to designated sites (both on existing paths or, in a few cases, as new access), we have assessed potential impacts and concluded that the Coast Path will not have an adverse effect on the Medway Estuary and Marshes SPA and Ramsar site.

Despite this stretch of coast being heavily designated we have been able to find 6km of brand new path that ECP users will be able to enjoy.

Representation number:	MCA/IGR Stretch/R/1/IGR2405
Organisation/ person making representation:	Historic England [Redacted], Assistant Inspector of Ancient Monuments
Route section(s) specific to this representation:	Whole Stretch
Other reports within stretch to which this representation also relates:	IGR 1, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12. There are more specific comments on the four scheduled monuments which appear in reports IGR 6, IGR 8, IGR 9 and IGR 12.
Representation in full	
Historic England are making a representation about this report as we are a statutory consultee, and advise in particular on proposals that affect designated monuments (e.g. scheduled monuments, listed buildings). Please find our advice and recommendations below.	

We do not have any objections to the Iwade - Grain proposal as we think it is in general a low impact proposal that will cause little to no harm to heritage significance. However the advice below does highlight those more historically sensitive areas of the route; whether other permissions/consents may be required for works in them (e.g. Scheduled Monument Consent); and advice on how to limit harm to the historic environment in general.

The path as proposed passes through the following scheduled monuments:

- World War II Heavy Anti-aircraft gunsite (TS3) at Wetham Green, 460m north of Red Brick Cottage (List Entry Ref: 1020387)
- Chatham Lines, section at Chatham Gun Wharf (List Entry Ref: 1021379)
- Cockham Wood Fort (List Entry Ref: 1003362)
- Coastal Artillery Defences on the Isle of Grain (List Entry Ref: 1019955)

The path also passes over or near the following listed structures:

- Passes over grade II Rochester Bridge (List Entry Ref: 1086431)
- Passes close to a number of grade II listed anti-tank cubes (List Entry Ref: 1393814) and pillboxes (List Entry Refs: 1393816 & 1393815) and the grade II Grain Crossing Signalling Box (List Entry Ref: 1415162)

The path also goes through the following conservation areas:

- Lower Halstow, Swale
- Upnor
- Chatham historic dockyard
- Brompton lines
- Star hill to Sun Pier, Medway
- Frindsbury and Manor Farm

The above summary provides an overview of all designated assets that have the potential to be impacted by the proposal (although we think the actual impact is likely to be low-nil).

In terms of the scheduled monuments, Scheduled Monument Consent (SMC) would only be required if any new installations (e.g. signage) are to be placed in the scheduled area; or if the introduction of new paths/use of existing paths through the scheduled area will involve any additions (e.g. new surfacing) or any ground disturbance (e.g. digging to create/resurface paths). If this is the case, Natural England will need to apply for SMC to Historic England in advance of any works in the scheduled areas commencing.

You should consult the local conservation officer with regards to impact upon the setting of grade II listed buildings or conservation areas. Finally, you should also consult the county archaeologist about impacts to non-designated archaeology.

Natural England's comments

We welcome the positive engagement from Historic England during the development of our proposals – and their supportive comments. Throughout this process we have consulted with Historic England, as well local officers at Kent County Council regarding Historic Environment Records (in line with para 4.9.5 Coastal Access Scheme) to ensure that our proposals would not have a detrimental effect on designated and local heritage assets.

Report IGR 2 does not contain any designated Scheduled Monuments or conservation areas, therefore no consents or further liaison with Historic England will be necessary prior to establishment of the proposals between Kingsferry Bridge and Raspberry Hill.

Representation number:	MCA/IGR Stretch/R/5/IGR2394
Organisation/ person making representation:	The Kent County Council Public Rights of Way and Access Service [Redacted]
Route section(s) specific to this representation:	Whole stretch
Other reports within stretch to which this representation also relates:	IGR 1, IGR 3, IGR 4, IGR 5, IGR 6 including more specific comments to IGR 4.
Representation in full	
<p>In broadest terms, the Kent County Council (KCC) Public Rights of Way (PRoW) and Access Service support the creation of the England Coast Path, recognising the benefits this new National Trail will bring to the County. The establishment of the England Coast Path will supplement the delivery of Kent's Rights of Way Improvement Plan by encouraging active lifestyles, providing sustainable travel choices and supporting the Kent economy.</p> <p>Having worked closely with Natural England during the development of this stretch, we are grateful for the opportunity we have been given to input into this process. While it is disappointing to see the proposed trail has not being aligned closer to the sea in places, the reasons for the preferred route are understood given the wildlife and environmental constraints of the existing landscape. We also fully understand the difficulties that have been encountered when balancing public and private interests.</p> <p>Natural England has acknowledged the existence of the Saxon Shore Way and proposed that the England Coast Path follows much of this route. While the Saxon Shore Way provides extensive opportunities to explore the North Kent Coast, the route does not always follow the principles of the Coastal Access Scheme. Further, the Saxon Shore Way was limited to passing along PRoW and public highways when it was originally created in 1980. It is therefore pleasing to note that Natural England has taken the opportunity presented by the Coastal Access Scheme to create new public access and provide alternatives to the existing on road sections of the Saxon Shore Way.</p> <p>Particular attention is drawn to the section of trail proposed on Map IGR 4b, where the Saxon Shore Way passes along the Sheerness Road. Natural England has acknowledged the advice from Kent Highways and understood that the Sheerness road is not suitable for a National Trail, with its expected levels of public use. The proposed trail alignment is welcomed as it would provide a safer off-road alternative to the existing Saxon Shore Way and adhere to the general principles of the Coastal Access Scheme.</p> <p>The KCC PRoW and Access Service look forward to working with Natural England in the future and delivering this stretch of the England Coast Path.</p>	
Natural England's comments	
<p>We welcome these supportive comments and the positive engagement from [redacted] during the development of our proposals.</p> <p>We also appreciate KCC's acknowledgement of the considerations that are a necessary part of developing the England Coast Path proposals, including wildlife and environmental constraints, balancing public and private interests and assessing whether existing paths meet the principles of the Coastal Access Scheme.</p>	

Other representations

Representation ID:	MCA/IGRStretch/R/2/IGR2959
Organisation/ person making representation:	[Redacted]

Name of site:	Whole route
Report map reference:	Whole route
Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.
<p>Summary of representation:</p> <p>The reports only makes passing reference to cycling. Unlike other parts of the Thames and the Kent coast, there is no official cycling trail along the shoreline between Whitstable and Dartford. National Cycle Network 1 is mainly away from the shore, except in Riverside Country Park. The England Coast Path route should be open to cycling, unless there is a good reason otherwise. Barriers should be removed along the route and surfaces could be improved in the long term. Making the route better for cycling would make it better for disabled access.</p>	
<p>Natural England's comment:</p> <p><u>Right to cycle</u></p> <p>In line with the Coastal Access duty to create clear and consistent public access rights along the coast for open-air recreation on foot, our reports to the Secretary of State set out proposals for a walking route only. Coastal access rights include most types of recreation on foot or by wheelchair including walking, climbing and picnicking. However, there are general restrictions on the scope of coastal access rights which are called "national restrictions", for example the coastal access rights do not normally include camping, horse riding or cycling. This does not prevent such recreational uses taking place by virtue of an existing right, with the landowner's permission or by traditional tolerance (sections 2.4.1 and 2.4.2 of the Coastal Access Scheme). Where there are existing higher rights along our proposed trail (such as the existence of bridleways, cycle tracks, public highway), we have highlighted those additional rights in the proposals table and associated maps within each of the 12 reports.</p> <p>In preparing the report, we met with local stakeholders to explore any issues and opportunities the England Coast Path presented. This included the Kent Countryside Access Forum (KCAF) and Medway Local Access Forum, who did not raise any specific aspirations about establishing new cycling rights along this stretch of coast. We also raised the potential for the dedication of higher rights with land owners affected by the trail. Whether or not to dedicate higher rights in this way is a decision for the landowners, not Natural England.</p> <p>Nonetheless, we note [redacted]'s points and have forwarded them to both the Medway and Kent Access Fora for their consideration, in relation to implementing their Rights of Way Improvement Plans. Any new rights to cycle along the England Coast Path in future would need to be negotiated with the relevant landowners before proceeding with either a direction to relax general restrictions, or a dedication under S16 of the CROW Act.</p> <p><u>Barriers to access</u></p> <p>In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.</p> <p>Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access such as replacing stiles with kissing gates or replacing kissing gates with gaps (section 4.3.10 of the Coastal Access Scheme). Land management requirements and local circumstances sometimes prohibit the removal of all gates, and we have</p>	

indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.

Representation ID:	MCA/IGRStretch/R/3/IGR0008
Organisation/ person making representation:	The Disabled Ramblers [Redacted]
Name of site:	Whole route
Report map reference:	Whole route
Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.
<p>Summary of representation: [Redacted] notes that it was really encouraging to read of the positive changes being proposed to improve access for mobility vehicles as well as why it is not possible to improve matters in certain places. [Redacted] appreciates that Natural England will consider more accessible options when change is made to some sections of the route in the near future.</p> <p>[Redacted] was also really pleased to read of the inclusion of some step-free routes that will be sign-posted to get around some unavoidable barriers and she thanks Natural England for our hard work on this, and for helping to open up the opportunities available to those with limited mobility.</p>	
<p>Natural England's comment: <u>Accessibility</u> We welcome the positive engagement from [redacted] during the development of our proposals and the supportive comments made by The Disabled Ramblers' Association.</p> <p>In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.</p> <p>Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access and leaving gaps or signposting step-free routes (section 4.3.10 of the Coastal Access Scheme). We have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.</p> <p>In regard to the mention of future changes to the route, this comment is likely to be related to the potential roll-back identified in the reports. With any new route, Natural England and the relevant Access Authority (Kent County Council) would seek to identify the most accessible route, balanced against the key principles described above, for the new trail alignment.</p>	

Length Report IGR3

Full representations

Representation number:	MCA/IGR3/R/1/IGR2397
Organisation/ person making representation:	Ramblers [Redacted], Coastal Access Officer for Kent
Route section(s) specific to this representation:	Report IGR 3
Other reports within stretch to which this representation also relates:	N/A
Representation in full	
The Ramblers fully support the proposed route along this section of the Coast Path. We are pleased to see the realigned route at Raspberry Hill through the old orchard and the proposed improvements to access along Raspberry Hill Lane.	
Natural England's comments	
We have welcomed the positive engagement from the [redacted] during the development of our proposals and we have liaised with the Ramblers regularly throughout the process.	

Representation number:	MCA/IGR Stretch/R/1/IGR2405
Organisation/ person making representation:	Historic England [Redacted], Assistant Inspector of Ancient Monuments
Route section(s) specific to this representation:	Whole Stretch
Other reports within stretch to which this representation also relates:	IGR 1, IGR 2, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12. There are more specific comments on the four scheduled monuments which appear in reports IGR 6, IGR 8, IGR 9 and IGR 12.
Representation in full	
<p>Historic England are making a representation about this report as we are a statutory consultee, and advise in particular on proposals that affect designated monuments (e.g. scheduled monuments, listed buildings). Please find our advice and recommendations below.</p> <p>We do not have any objections to the Iwade - Grain proposal as we think it is in general a low impact proposal that will cause little to no harm to heritage significance. However the advice below does highlight those more historically sensitive areas of the route; whether other permissions/consents may be required for works in them (e.g. Scheduled Monument Consent); and advice on how to limit harm to the historic environment in general.</p> <p>The path as proposed passes through the following scheduled monuments:</p> <ul style="list-style-type: none"> • World War II Heavy Anti-aircraft gunsite (TS3) at Wetham Green, 460m north of Red Brick Cottage (List Entry Ref: 1020387) • Chatham Lines, section at Chatham Gun Wharf (List Entry Ref: 1021379) • Cockham Wood Fort (List Entry Ref: 1003362) • Coastal Artillery Defences on the Isle of Grain (List Entry Ref: 1019955) <p>The path also passes over or near the following listed structures:</p> <ul style="list-style-type: none"> • Passes over grade II Rochester Bridge (List Entry Ref: 1086431) 	

- Passes close to a number of grade II listed anti-tank cubes (List Entry Ref: 1393814) and pillboxes (List Entry Refs: 1393816 & 1393815) and the grade II Grain Crossing Signalling Box (List Entry Ref: 1415162)

The path also goes through the following conservation areas:

- Lower Halstow, Swale
- Upnor
- Chatham historic dockyard
- Brompton lines
- Star hill to Sun Pier, Medway
- Frindsbury and Manor Farm

The above summary provides an overview of all designated assets that have the potential to be impacted by the proposal (although we think the actual impact is likely to be low-nil).

In terms of the scheduled monuments, Scheduled Monument Consent (SMC) would only be required if any new installations (e.g. signage) are to be placed in the scheduled area; or if the introduction of new paths/use of existing paths through the scheduled area will involve any additions (e.g. new surfacing) or any ground disturbance (e.g. digging to create/resurface paths). If this is the case, Natural England will need to apply for SMC to Historic England in advance of any works in the scheduled areas commencing.

You should consult the local conservation officer with regards to impact upon the setting of grade II listed buildings or conservation areas. Finally, you should also consult the county archaeologist about impacts to non-designated archaeology.

Natural England's comments

We welcome the positive engagement from Historic England during the development of our proposals – and their supportive comments. Throughout this process we have consulted with Historic England, as well local officers at Kent County Council regarding Historic Environment Records (in line with para 4.9.5 Coastal Access Scheme) to ensure that our proposals would not have a detrimental effect on designated and local heritage assets.

Report IGR 3 does not contain any designated Scheduled Monuments or conservation areas, therefore no consents or further liaison with Historic England will be necessary prior to establishment of the proposals between Raspberry Hill and Funton Brickworks.

Representation number:	MCA/IGR Stretch/R/5/IGR2394
Organisation/ person making representation:	The Kent County Council Public Rights of Way and Access Service [Redacted]
Route section(s) specific to this representation:	Whole stretch
Other reports within stretch to which this representation also relates:	IGR 1, IGR 2, IGR 4, IGR 5, IGR 6 including more specific comments on IGR 4.
Representation in full	
In broadest terms, the Kent County Council (KCC) Public Rights of Way (PRoW) and Access Service support the creation of the England Coast Path, recognising the benefits this new National Trail will bring to the County. The establishment of the England Coast Path will supplement the delivery of Kent's Rights of Way Improvement Plan by encouraging active lifestyles, providing sustainable travel choices and supporting the Kent economy.	
Having worked closely with Natural England during the development of this stretch, we are grateful for the opportunity we have been given to input into this process. While it is disappointing to see the	

proposed trail has not being aligned closer to the sea in places, the reasons for the preferred route are understood given the wildlife and environmental constraints of the existing landscape. We also fully understand the difficulties that have been encountered when balancing public and private interests.

Natural England has acknowledged the existence of the Saxon Shore Way and proposed that the England Coast Path follows much of this route. While the Saxon Shore Way provides extensive opportunities to explore the North Kent Coast, the route does not always follow the principles of the Coastal Access Scheme. Further, the Saxon Shore Way was limited to passing along PRow and public highways when it was originally created in 1980. It is therefore pleasing to note that Natural England has taken the opportunity presented by the Coastal Access Scheme to create new public access and provide alternatives to the existing on road sections of the Saxon Shore Way.

Particular attention is drawn to the section of trail proposed on Map IGR 4b, where the Saxon Shore Way passes along the Sheerness Road. Natural England has acknowledged the advice from Kent Highways and understood that the Sheerness road is not suitable for a National Trail, with its expected levels of public use. The proposed trail alignment is welcomed as it would provide a safer off-road alternative to the existing Saxon Shore Way and adhere to the general principles of the Coastal Access Scheme.

The KCC PRow and Access Service look forward to working with Natural England in the future and delivering this stretch of the England Coast Path.

Natural England's comments

We welcome these supportive comments and the positive engagement from [redacted] during the development of our proposals.

We also appreciate KCC's acknowledgement of the considerations that are a necessary part of developing the England Coast Path proposals, including wildlife and environmental constraints, balancing public and private interests and assessing whether existing paths meet the principles of the Coastal Access Scheme.

Other representations

Representation ID:	MCA/IGR3/R/2/IGR2982
Organisation/ person making representation:	[Redacted]
Name of site:	Raspberry Hill Lane, Saxon Shore Way
Report map reference:	Map IGR 3a
Route sections on or adjacent to the land:	IGR-3-S001 to IGR-3-S008
Other reports within stretch to which this representation also relates	N/A
Summary of representation: [Redacted] is surprised and concerned as to why the proposed routing between Raspberry Hill and Funton Brickworks (IRG3) is along a busy rural road rather than making use of the existing Saxon Shore Way which affords good views of the Estuary.	
Natural England's comment: In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme).	

The proposed trail sections between IGR-3-S001 and IGR-3-S008 follow the coastline very closely, creating a new route directly adjacent to, and overlooking the Medway Estuary. Sections IGR-3-S003 to IGR-3-S006 are aligned on the currently impassable road verge, seaward of Raspberry Hill Lane. As part of these proposals, a new path will be created on this verge, which will provide a safe, off-road route for walkers alongside this rural road.

[Redacted]'s preferred route of the Saxon Shore Way (a promoted route created in 1980 to follow the ancient shoreline of Kent), lies approximately 300m inland of the coast, and whilst it does have some elevated sea views, for the majority of the route in this area there are no views.

On balance, we consider that the proposed route between sections IGR-3-S001 and IGR-3-S008 better meets the criteria of the Coastal Access Scheme, as stated above: as being close to the estuary; providing continuous sea views; being safe to follow (as an off road route); and also providing a convenient route. Our proposed trail provides a direct route alongside the coast and avoids an unnecessary inland diversion onto the Saxon Shore Way at this point. In addition, the network of rights of way that exist inland of the coast here will remain, and together with the England Coast Path (if approved), could provide opportunities for new circular walks in the area.

Representation ID:	MCA/IGR3/R/3/IGR3005
Organisation/ person making representation:	[Redacted]
Name of site:	Raspberry Hill Lane, Saxon Shore Way
Report map reference:	Map IGR 3a
Route sections on or adjacent to the land:	IGR-3-S001 to IGR-3-S008
Other reports within stretch to which this representation also relates	N/A
<p>Summary of representation:</p> <p>[Redacted] believes that trail sections IGR-3-S003 to IGR-3-S006 is unsuitable for the England Coast Path as there is a busy fast road adjacent to the trail. The route also floods and becomes unpassable.</p> <p>This route is also not suitable for vulnerable adults with reduced mobility, who he works with, and it is also very dangerous for them. There is no safe parking at this site for his service users.</p> <p>[Redacted] believes that this section is a waste of public money, especially if it does not improve access for all, and instead proposes that the England Coast Path leaves a gap between Iwade and Rochester Bridge and asks users to follow the Saxon Shore Way instead. Public funds should be spent on improving sites which have existing public access for those with reduced mobility.</p>	
<p>Natural England's comment:</p> <p><u>Road-side route</u></p> <p>Natural England carefully considered the safety and suitability of the proposed route here, and commissioned Kent County Council's Highways team to carry out a safety audit of the proposed route at Raspberry Hill Lane in September 2018 (see document 5A). They assessed and made recommendations for the route in the Raspberry Hill Lane area, and concluded that KCC's Public Rights of Way team would be able to design and create a suitable footpath on the verge (IGR-3-S003 to IGR-3-S006), which we have proposed in our report. Our proposals also include the other measures they suggested, such as the specific location of the crossing point (IGR-3-S007) and new road signage to alert drivers of pedestrians.</p> <p>We are aware that Raspberry Hill Lane suffers from coastal flooding two to three times per year, which is documented in the Accessibility section of Report IGR 3. During these rare occasions the route is impassable, so walkers will be required to wait until the water has subsided. Trail information signs will</p>	

be installed to clearly advise the public about the flooding hazard and how long the wait may be (c2 hours). We have also been advised by public authorities that the landward Saxon Shore Way in this location is currently unsuitable to promote as an alternative route, although this situation may change in the future.

Accessibility

In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.

Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme).

Where new infrastructure is necessary along the trail, we will seek to install the most accessible items for those with reduced mobility to reduce unnecessary barriers, where practical. In this report, we have improved accessibility along Raspberry Hill Lane, by creating a new path on the verge as well as including the provision of a new ramp instead of steps, and a chicane access barrier and large kissing gate, both of which enable those with large mobility scooters and pushchairs to access the Coast Path.

Parking availability

We are not required to consider additional visitor facilities such as car parks, toilets or public transport as part of our proposals to the Secretary of State. In practice we expect local authorities, local businesses and communities to decide what additional visitor facilities are appropriate. These do not form part of the proposals in our report (see section 4.3.12 of the Coastal Access Scheme).

Value for money

Natural England's proposals for the route between Iwade (Report IGR 1) and Rochester Bridge (Report IGR 8) mainly follow the Saxon Shore Way, where this existing walking route best meets the principles of the Coastal Access Scheme as being close to the coast, offering good sea views and providing a safe route. However, since the Saxon Shore Way was created in 1980, traffic use in Kent and Medway has increased, and we have been advised by KCC that some of the rural roads on which this route is located are now busy and not suitable for a nationally promoted route.

We consider that our proposals at Raspberry Hill Lane offer value for money. They are part of a wider suite of improvements between Iwade and Rochester Bridge that:

- a) increase the accessibility of the existing Saxon Shore Way, for example by: removing existing barriers along the route at IGR-5-S009 and IGR-7-S011; carrying out surface improvements near IGR-5-S007; and improving drainage at IGR-6-S008 to avoid surface water flooding. Also see the accessibility section of Reports IGR 1 to IGR 8 for more examples.
- b) include new access which will bring people closer to the coast, with improved views of the Medway Estuary, for example here at Raspberry Hill Lane (Report IGR 3), at Lower Halstow (Report IGR 4), and through the Medway towns and around St Mary's Island (Report IGR 8); and
- c) provide new and off-road routes for walkers in those areas that we have been advised the existing Saxon Shore Way road routes are not safe for a promoted route, for example at Ridham Dock Roundabout and near Kingsferry Bridge (Report IGR 1), Lower Halstow (Report IGR 4) and at Horsham Marsh (Report IGR 6). The Coast Path proposals from Iwade to Rochester Bridge also secure continuity of access in the area as some of the aforementioned SSW routes, which are aligned on the road, may be discontinued due to increasing traffic and safety concerns.

This section of the proposed trail near Raspberry Hill Lane also provides the opportunity to create new circular walks in the area by connecting with the existing rights of way network in the vicinity of Iwade village and with Swale railway station, providing opportunities for local businesses. This type of economic opportunity was highlighted in a Natural England study to assess the economic and health

benefits of walking on English coastal paths ([published January 2020](#)). The economic benefits of the English coastal paths as highlighted in the study included:

- Over 29 million leisure walking trips took place on English coastal paths in 2017. Almost half of the visitors to coastal paths are local day visitors.
- Over £379 million is spent in the national economy as a result of trips to use English coastal paths, of which £350 million is spent within local coastal economies.

When taking into account the benefits and improvements described above, Natural England considers the route from Raspberry Hill to Funton Brickworks, at an estimated cost of £7,768, to be justified and provide value for money. Finally, the route also delivers on Natural England's Coastal Access Duty set out in the Marine and Coastal Access Act (2009), section 296, that there "is a route for the whole of the English coast..."

Relevant appended documents (see Section 5):

5C: Kent County Council, Highways, Transportation and Waste, Report of safety measures at Highways Interfaces, September 2018. Site 6 – Raspberry Hill Lane near Lower Halstow

Representation ID:	MCA/IGRStretch/R/2/IGR2959
Organisation/ person making representation:	[Redacted]
Name of site:	Whole route
Report map reference:	Whole route
Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.
<p>Summary of representation:</p> <p>The reports only makes passing reference to cycling. Unlike other parts of the Thames and the Kent coast, there is no official cycling trail along the shoreline between Whitstable and Dartford. National Cycle Network 1 is mainly away from the shore, except in Riverside Country Park. The England Coast Path route should be open to cycling, unless there is a good reason otherwise. Barriers should be removed along the route and surfaces could be improved in the long term. Making the route better for cycling would make it better for disabled access.</p>	
<p>Natural England's comment:</p> <p><u>Right to cycle</u></p> <p>In line with the Coastal Access duty to create clear and consistent public access rights along the coast for open-air recreation on foot, our reports to the Secretary of State set out proposals for a walking route only. Coastal access rights include most types of recreation on foot or by wheelchair including walking, climbing and picnicking. However, there are general restrictions on the scope of coastal access rights which are called "national restrictions", for example the coastal access rights do not normally include camping, horse riding or cycling. This does not prevent such recreational uses taking place by virtue of an existing right, with the landowner's permission or by traditional tolerance (sections 2.4.1 and 2.4.2 of the Coastal Access Scheme). Where there are existing higher rights along our proposed trail (such as the existence of bridleways, cycle tracks, public highway), we have highlighted those additional rights in the proposals table and associated maps within each of the 12 reports.</p> <p>In preparing the report, we met with local stakeholders to explore any issues and opportunities the England Coast Path presented. This included the Kent Countryside Access Forum (KCAF) and Medway Local Access Forum, who did not raise any specific aspirations about establishing new cycling rights along this stretch of coast. We also raised the potential for the dedication of higher rights</p>	

with land owners affected by the trail. Whether or not to dedicate higher rights in this way is a decision for the landowners, not Natural England.

Nonetheless, we note [redacted]'s points and have forwarded them to both the Medway and Kent Access Fora for their consideration, in relation to implementing their Rights of Way Improvement Plans. Any new rights to cycle along the England Coast Path in future would need to be negotiated with the relevant landowners before proceeding with either a direction to relax general restrictions, or a dedication under S16 of the CROW Act.

Barriers to access

In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.

Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access such as replacing stiles with kissing gates or replacing kissing gates with gaps (section 4.3.10 of the Coastal Access Scheme). Land management requirements and local circumstances sometimes prohibit the removal of all gates, and we have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.

Representation ID:	MCA/IGRStretch/R/3/IGR0008
Organisation/ person making representation:	The Disabled Ramblers [Redacted]
Name of site:	Whole route
Report map reference:	Whole route
Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.
Summary of representation: [Redacted] notes that it was really encouraging to read of the positive changes being proposed to improve access for mobility vehicles as well as why it is not possible to improve matters in certain places. [Redacted] appreciates that Natural England will consider more accessible options when change is made to some sections of the route in the near future. [Redacted] was also really pleased to read of the inclusion of some step-free routes that will be sign-posted to get around some unavoidable barriers and she thanks Natural England for our hard work on this, and for helping to open up the opportunities available to those with limited mobility.	

Natural England's comment:Accessibility

We welcome the positive engagement from [redacted] during the development of our proposals and the supportive comments made by The Disabled Ramblers' Association.

In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.

Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access and leaving gaps or signposting step-free routes (section 4.3.10 of the Coastal Access Scheme). We have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.

In regard to the mention of future changes to the route, this comment is likely to be related to the potential roll-back identified in the reports. With any new route, Natural England and the relevant Access Authority (Kent County Council) would seek to identify the most accessible route, balanced against the key principles described above, for the new trail alignment.

Length Report IGR5

Full representations

Representation number:	MCA/IGR5/R/1/IGR2397
Organisation/ person making representation:	Ramblers [Redacted], Coastal Access Officer for Kent
Route section(s) specific to this representation:	Report IGR 5
Other reports within stretch to which this representation also relates:	N/A
Representation in full	
The Ramblers fully support the proposed route along this section of the Coast Path.	
Natural England's comments	
We have welcomed the positive engagement from the [redacted] during the development of our proposals.	

Representation number:	MCA/IGR Stretch/R/1/IGR2405
Organisation/ person making representation:	Historic England [Redacted], Assistant Inspector of Ancient Monuments
Route section(s) specific to this representation:	Whole Stretch
Other reports within stretch to which this representation also relates:	IGR 1, IGR 2, IGR 3, IGR 4, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12. There are more specific comments on the four scheduled monuments which appear in reports IGR 6, IGR 8, IGR 9 and IGR 12.
Representation in full	
<p>Historic England are making a representation about this report as we are a statutory consultee, and advise in particular on proposals that affect designated monuments (e.g. scheduled monuments, listed buildings). Please find our advice and recommendations below.</p> <p>We do not have any objections to the Iwade - Grain proposal as we think it is in general a low impact proposal that will cause little to no harm to heritage significance. However the advice below does highlight those more historically sensitive areas of the route; whether other permissions/consents may be required for works in them (e.g. Scheduled Monument Consent); and advice on how to limit harm to the historic environment in general.</p> <p>The path as proposed passes through the following scheduled monuments:</p> <ul style="list-style-type: none"> • World War II Heavy Anti-aircraft gunsite (TS3) at Wetham Green, 460m north of Red Brick Cottage (List Entry Ref: 1020387) • Chatham Lines, section at Chatham Gun Wharf (List Entry Ref: 1021379) • Cockham Wood Fort (List Entry Ref: 1003362) • Coastal Artillery Defences on the Isle of Grain (List Entry Ref: 1019955) <p>The path also passes over or near the following listed structures:</p> <ul style="list-style-type: none"> • Passes over grade II Rochester Bridge (List Entry Ref: 1086431) 	

- Passes close to a number of grade II listed anti-tank cubes (List Entry Ref: 1393814) and pillboxes (List Entry Refs: 1393816 & 1393815) and the grade II Grain Crossing Signalling Box (List Entry Ref: 1415162)

The path also goes through the following conservation areas:

- Lower Halstow, Swale
- Upnor
- Chatham historic dockyard
- Brompton lines
- Star hill to Sun Pier, Medway
- Frindsbury and Manor Farm

The above summary provides an overview of all designated assets that have the potential to be impacted by the proposal (although we think the actual impact is likely to be low-nil).

In terms of the scheduled monuments, Scheduled Monument Consent (SMC) would only be required if any new installations (e.g. signage) are to be placed in the scheduled area; or if the introduction of new paths/use of existing paths through the scheduled area will involve any additions (e.g. new surfacing) or any ground disturbance (e.g. digging to create/resurface paths). If this is the case, Natural England will need to apply for SMC to Historic England in advance of any works in the scheduled areas commencing.

You should consult the local conservation officer with regards to impact upon the setting of grade II listed buildings or conservation areas. Finally, you should also consult the county archaeologist about impacts to non-designated archaeology.

Natural England's comments

We welcome the positive engagement from Historic England during the development of our proposals – and their supportive comments. Throughout this process we have consulted with Historic England, as well local officers at Kent County Council regarding Historic Environment Records (in line with para 4.9.5 Coastal Access Scheme) to ensure that our proposals would not have a detrimental effect on designated and local heritage assets.

Report IGR 5 does not contain any designated Scheduled Monuments, therefore no consents or further liaison with Historic England will be necessary prior to establishment of the proposals between Lower Halstow and Shoregate Creek. Part of this stretch does fall within the Lower Halstow Conservation Area. Within the conservation area, our proposals only include one or two new waymarker posts on an existing walked route which is also the Saxon Shore Way. Kent County Council, the relevant Access Authority, will therefore liaise with Swale Borough Council to ensure the design and location of the waymarker posts are in keeping with the designation.

Representation number:	MCA/IGR Stretch/R/5/IGR2394
Organisation/ person making representation:	The Kent County Council Public Rights of Way and Access Service [Redacted]
Route section(s) specific to this representation:	Whole stretch
Other reports within stretch to which this representation also relates:	IGR 1, IGR 2, IGR 3, IGR 4, IGR 6 including more specific comments on IGR 4.
Representation in full	
In broadest terms, the Kent County Council (KCC) Public Rights of Way (PRoW) and Access Service support the creation of the England Coast Path, recognising the benefits this new National Trail will bring to the County. The establishment of the England Coast Path will supplement the delivery of	

Kent's Rights of Way Improvement Plan by encouraging active lifestyles, providing sustainable travel choices and supporting the Kent economy.

Having worked closely with Natural England during the development of this stretch, we are grateful for the opportunity we have been given to input into this process. While it is disappointing to see the proposed trail has not being aligned closer to the sea in places, the reasons for the preferred route are understood given the wildlife and environmental constraints of the existing landscape. We also fully understand the difficulties that have been encountered when balancing public and private interests.

Natural England has acknowledged the existence of the Saxon Shore Way and proposed that the England Coast Path follows much of this route. While the Saxon Shore Way provides extensive opportunities to explore the North Kent Coast, the route does not always follow the principles of the Coastal Access Scheme. Further, the Saxon Shore Way was limited to passing along PRow and public highways when it was originally created in 1980. It is therefore pleasing to note that Natural England has taken the opportunity presented by the Coastal Access Scheme to create new public access and provide alternatives to the existing on road sections of the Saxon Shore Way.

Particular attention is drawn to the section of trail proposed on Map IGR 4b, where the Saxon Shore Way passes along the Sheerness Road. Natural England has acknowledged the advice from Kent Highways and understood that the Sheerness road is not suitable for a National Trail, with its expected levels of public use. The proposed trail alignment is welcomed as it would provide a safer off-road alternative to the existing Saxon Shore Way and adhere to the general principles of the Coastal Access Scheme.

The KCC PRow and Access Service look forward to working with Natural England in the future and delivering this stretch of the England Coast Path.

Natural England's comments

We welcome these supportive comments and the positive engagement from [redacted] during the development of our proposals.

We also appreciate KCC's acknowledgement of the considerations that are a necessary part of developing the England Coast Path proposals, including wildlife and environmental constraints, balancing public and private interests and assessing whether existing paths meet the principles of the Coastal Access Scheme.

Other representations

Representation ID:	MCA/IGRStretch/R/2/IGR2959
Organisation/ person making representation:	[Redacted]
Name of site:	Whole route
Report map reference:	Whole route
Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.
Summary of representation:	The reports only makes passing reference to cycling. Unlike other parts of the Thames and the Kent coast, there is no official cycling trail along the shoreline between Whitstable and Dartford. National

Cycle Network 1 is mainly away from the shore, except in Riverside Country Park. The England Coast Path route should be open to cycling, unless there is a good reason otherwise. Barriers should be removed along the route and surfaces could be improved in the long term. Making the route better for cycling would make it better for disabled access.

Natural England's comment:

Right to cycle

In line with the Coastal Access duty to create clear and consistent public access rights along the coast for open-air recreation on foot, our reports to the Secretary of State set out proposals for a walking route only. Coastal access rights include most types of recreation on foot or by wheelchair including walking, climbing and picnicking. However, there are general restrictions on the scope of coastal access rights which are called "national restrictions", for example the coastal access rights do not normally include camping, horse riding or cycling. This does not prevent such recreational uses taking place by virtue of an existing right, with the landowner's permission or by traditional tolerance (sections 2.4.1 and 2.4.2 of the Coastal Access Scheme). Where there are existing higher rights along our proposed trail (such as the existence of bridleways, cycle tracks, public highway), we have highlighted those additional rights in the proposals table and associated maps within each of the 12 reports.

In preparing the report, we met with local stakeholders to explore any issues and opportunities the England Coast Path presented. This included the Kent Countryside Access Forum (KCAF) and Medway Local Access Forum, who did not raise any specific aspirations about establishing new cycling rights along this stretch of coast. We also raised the potential for the dedication of higher rights with land owners affected by the trail. Whether or not to dedicate higher rights in this way is a decision for the landowners, not Natural England.

Nonetheless, we note [redacted]'s points and have forwarded them to both the Medway and Kent Access Fora for their consideration, in relation to implementing their Rights of Way Improvement Plans. Any new rights to cycle along the England Coast Path in future would need to be negotiated with the relevant landowners before proceeding with either a direction to relax general restrictions, or a dedication under S16 of the CROW Act.

Barriers to access

In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.

Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access such as replacing stiles with kissing gates or replacing kissing gates with gaps (section 4.3.10 of the Coastal Access Scheme). Land management requirements and local circumstances sometimes prohibit the removal of all gates, and we have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.

Representation ID:	MCA/IGRStretch/R/3/IGR0008
Organisation/ person making representation:	The Disabled Ramblers [Redacted]
Name of site:	Whole route
Report map reference:	Whole route

Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.
<p>Summary of representation:</p> <p>[Redacted] notes that it was really encouraging to read of the positive changes being proposed to improve access for mobility vehicles as well as why it is not possible to improve matters in certain places. [Redacted] appreciates that Natural England will consider more accessible options when change is made to some sections of the route in the near future.</p> <p>[Redacted] was also really pleased to read of the inclusion of some step-free routes that will be sign-posted to get around some unavoidable barriers and she thanks Natural England for our hard work on this, and for helping to open up the opportunities available to those with limited mobility.</p>	
<p>Natural England's comment:</p> <p><u>Accessibility</u></p> <p>We welcome the positive engagement from [redacted] during the development of our proposals and the supportive comments made by The Disabled Ramblers' Association.</p> <p>In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.</p> <p>Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access and leaving gaps or signposting step-free routes (section 4.3.10 of the Coastal Access Scheme). We have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.</p> <p>In regard to the mention of future changes to the route, this comment is likely to be related to the potential roll-back identified in the reports. With any new route, Natural England and the relevant Access Authority (Kent County Council) would seek to identify the most accessible route, balanced against the key principles described above, for the new trail alignment.</p>	

Length Report IGR7

Full representations

Representation number:	MCA/IGR7/R/1/IGR2397
Organisation/ person making representation:	Ramblers [Redacted], Coastal Access Officer for Kent
Route section(s) specific to this representation:	Report IGR 7
Other reports within stretch to which this representation also relates:	N/A
Representation in full	
The Ramblers fully support the proposed route along this section of the Coast Path. We note the problems to the west of the Sewage Treatment Works at Motney Hill but are pleased that this area will still become part of the accessible coastal margin.	
Natural England's comments	
We have welcomed the positive engagement from the [redacted] during the development of our proposals.	

Representation number:	MCA/IGR Stretch/R/1/IGR2405
Organisation/ person making representation:	Historic England [Redacted], Assistant Inspector of Ancient Monuments
Route section(s) specific to this representation:	Whole Stretch
Other reports within stretch to which this representation also relates:	IGR 1, IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12. There are more specific comments on the four scheduled monuments which appear in reports IGR 6, IGR 8, IGR 9 and IGR 12.
Representation in full	
<p>Historic England are making a representation about this report as we are a statutory consultee, and advise in particular on proposals that affect designated monuments (e.g. scheduled monuments, listed buildings). Please find our advice and recommendations below.</p> <p>We do not have any objections to the Iwade - Grain proposal as we think it is in general a low impact proposal that will cause little to no harm to heritage significance. However the advice below does highlight those more historically sensitive areas of the route; whether other permissions/consents may be required for works in them (e.g. Scheduled Monument Consent); and advice on how to limit harm to the historic environment in general.</p> <p>The path as proposed passes through the following scheduled monuments:</p> <ul style="list-style-type: none"> • World War II Heavy Anti-aircraft gunsite (TS3) at Wetham Green, 460m north of Red Brick Cottage (List Entry Ref: 1020387) • Chatham Lines, section at Chatham Gun Wharf (List Entry Ref: 1021379) • Cockham Wood Fort (List Entry Ref: 1003362) • Coastal Artillery Defences on the Isle of Grain (List Entry Ref: 1019955) <p>The path also passes over or near the following listed structures:</p> <ul style="list-style-type: none"> • Passes over grade II Rochester Bridge (List Entry Ref: 1086431) 	

- Passes close to a number of grade II listed anti-tank cubes (List Entry Ref: 1393814) and pillboxes (List Entry Refs: 1393816 & 1393815) and the grade II Grain Crossing Signalling Box (List Entry Ref: 1415162)

The path also goes through the following conservation areas:

- Lower Halstow, Swale
- Upnor
- Chatham historic dockyard
- Brompton lines
- Star hill to Sun Pier, Medway
- Frindsbury and Manor Farm

The above summary provides an overview of all designated assets that have the potential to be impacted by the proposal (although we think the actual impact is likely to be low-nil).

In terms of the scheduled monuments, Scheduled Monument Consent (SMC) would only be required if any new installations (e.g. signage) are to be placed in the scheduled area; or if the introduction of new paths/use of existing paths through the scheduled area will involve any additions (e.g. new surfacing) or any ground disturbance (e.g. digging to create/resurface paths). If this is the case, Natural England will need to apply for SMC to Historic England in advance of any works in the scheduled areas commencing.

You should consult the local conservation officer with regards to impact upon the setting of grade II listed buildings or conservation areas. Finally, you should also consult the county archaeologist about impacts to non-designated archaeology.

Natural England's comments

We welcome the positive engagement from Historic England during the development of our proposals – and their supportive comments. Throughout this process we have consulted with Historic England, as well local officers at Kent County Council regarding Historic Environment Records (in line with para 4.9.5 Coastal Access Scheme) to ensure that our proposals would not have a detrimental effect on designated and local heritage assets.

Report IGR 7 does not contain any designated Scheduled Monuments or conservation areas, therefore no consents or further liaison with Historic England will be necessary prior to establishment of the proposals between Otterham Quay and The Strand Leisure Park.

Other representations

Representation ID:	MCA/IGRStretch/R/2/IGR2959
Organisation/ person making representation:	[Redacted]
Name of site:	Whole route
Report map reference:	Whole route
Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.

Summary of representation:

The reports only makes passing reference to cycling. Unlike other parts of the Thames and the Kent coast, there is no official cycling trail along the shoreline between Whitstable and Dartford. National Cycle Network 1 is mainly away from the shore, except in Riverside Country Park. The England Coast Path route should be open to cycling, unless there is a good reason otherwise. Barriers should be removed along the route and surfaces could be improved in the long term. Making the route better for cycling would make it better for disabled access.

Natural England's comment:Right to cycle

In line with the Coastal Access duty to create clear and consistent public access rights along the coast for open-air recreation on foot, our reports to the Secretary of State set out proposals for a walking route only. Coastal access rights include most types of recreation on foot or by wheelchair including walking, climbing and picnicking. However, there are general restrictions on the scope of coastal access rights which are called "national restrictions", for example the coastal access rights do not normally include camping, horse riding or cycling. This does not prevent such recreational uses taking place by virtue of an existing right, with the landowner's permission or by traditional tolerance (sections 2.4.1 and 2.4.2 of the Coastal Access Scheme). Where there are existing higher rights along our proposed trail (such as the existence of bridleways, cycle tracks, public highway), we have highlighted those additional rights in the proposals table and associated maps within each of the 12 reports.

In preparing the report, we met with local stakeholders to explore any issues and opportunities the England Coast Path presented. This included the Kent Countryside Access Forum (KCAF) and Medway Local Access Forum, who did not raise any specific aspirations about establishing new cycling rights along this stretch of coast. We also raised the potential for the dedication of higher rights with land owners affected by the trail. Whether or not to dedicate higher rights in this way is a decision for the landowners, not Natural England.

Nonetheless, we note [redacted]'s points and have forwarded them to both the Medway and Kent Access Fora for their consideration, in relation to implementing their Rights of Way Improvement Plans. Any new rights to cycle along the England Coast Path in future would need to be negotiated with the relevant landowners before proceeding with either a direction to relax general restrictions, or a dedication under S16 of the CROW Act.

Barriers to access

In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.

Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access such as replacing stiles with kissing gates or replacing kissing gates with gaps (section 4.3.10 of the Coastal Access Scheme). Land management requirements and local circumstances sometimes prohibit the removal of all gates, and we have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.

Representation ID:	MCA/IGRStretch/R/3/IGR0008
Organisation/ person making representation:	The Disabled Ramblers [Redacted]
Name of site:	Whole route

Report map reference:	Whole route
Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.
<p>Summary of representation:</p> <p>[Redacted] notes that it was really encouraging to read of the positive changes being proposed to improve access for mobility vehicles as well as why it is not possible to improve matters in certain places. [Redacted] appreciates that Natural England will consider more accessible options when change is made to some sections of the route in the near future.</p> <p>[Redacted] was also really pleased to read of the inclusion of some step-free routes that will be sign-posted to get around some unavoidable barriers and she thanks Natural England for our hard work on this, and for helping to open up the opportunities available to those with limited mobility.</p> <p>Natural England's comment:</p> <p><u>Accessibility</u></p> <p>We welcome the positive engagement from [redacted] during the development of our proposals and the supportive comments made by The Disabled Ramblers' Association.</p> <p>In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.</p> <p>Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access and leaving gaps or signposting step-free routes (section 4.3.10 of the Coastal Access Scheme). We have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.</p> <p>In regard to the mention of future changes to the route, this comment is likely to be related to the potential roll-back identified in the reports. With any new route, Natural England and the relevant Access Authority (Kent County Council) would seek to identify the most accessible route, balanced against the key principles described above, for the new trail alignment.</p>	

Length Report IGR9

Full representations

Representation number:	MCA/IGR9/R/1/IGR2397
Organisation/ person making representation:	Ramblers [Redacted], Coastal Access Officer for Kent
Route section(s) specific to this representation:	Report IGR 9
Other reports within stretch to which this representation also relates:	N/A
Representation in full	
The Ramblers fully support the proposed route along this section of the Coast Path. Of the options available we are happy that the best have been selected.	
Natural England's comments	
We have welcomed the positive engagement from the [redacted] during the development of our proposals.	

Representation number:	MCA/IGR Stretch/R/1/IGR2405
Organisation/ person making representation:	Historic England [Redacted], Assistant Inspector of Ancient Monuments
Route section(s) specific to this representation:	Whole Stretch
Other reports within stretch to which this representation also relates:	IGR 1, IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 10, IGR 11, IGR 12. There are more specific comments on the four scheduled monuments which appear in reports IGR 6, IGR 8, IGR 9 and IGR 12.
Representation in full	
<p>Historic England are making a representation about this report as we are a statutory consultee, and advise in particular on proposals that affect designated monuments (e.g. scheduled monuments, listed buildings). Please find our advice and recommendations below.</p> <p>We do not have any objections to the Iwade - Grain proposal as we think it is in general a low impact proposal that will cause little to no harm to heritage significance. However the advice below does highlight those more historically sensitive areas of the route; whether other permissions/consents may be required for works in them (e.g. Scheduled Monument Consent); and advice on how to limit harm to the historic environment in general.</p> <p>The path as proposed passes through the following scheduled monuments:</p> <ul style="list-style-type: none"> • World War II Heavy Anti-aircraft gunsite (TS3) at Wetham Green, 460m north of Red Brick Cottage (List Entry Ref: 1020387) • Chatham Lines, section at Chatham Gun Wharf (List Entry Ref: 1021379) • Cockham Wood Fort (List Entry Ref: 1003362) • Coastal Artillery Defences on the Isle of Grain (List Entry Ref: 1019955) <p>The path also passes over or near the following listed structures:</p> <ul style="list-style-type: none"> • Passes over grade II Rochester Bridge (List Entry Ref: 1086431) 	

- Passes close to a number of grade II listed anti-tank cubes (List Entry Ref: 1393814) and pillboxes (List Entry Refs: 1393816 & 1393815) and the grade II Grain Crossing Signalling Box (List Entry Ref: 1415162)

The path also goes through the following conservation areas:

- Lower Halstow, Swale
- Upnor
- Chatham historic dockyard
- Brompton lines
- Star hill to Sun Pier, Medway
- Frindsbury and Manor Farm

The above summary provides an overview of all designated assets that have the potential to be impacted by the proposal (although we think the actual impact is likely to be low-nil).

In terms of the scheduled monuments, Scheduled Monument Consent (SMC) would only be required if any new installations (e.g. signage) are to be placed in the scheduled area; or if the introduction of new paths/use of existing paths through the scheduled area will involve any additions (e.g. new surfacing) or any ground disturbance (e.g. digging to create/resurface paths). If this is the case, Natural England will need to apply for SMC to Historic England in advance of any works in the scheduled areas commencing.

You should consult the local conservation officer with regards to impact upon the setting of grade II listed buildings or conservation areas. Finally, you should also consult the county archaeologist about impacts to non-designated archaeology.

Natural England's comments

We welcome the positive engagement from Historic England during the development of our proposals – and their supportive comments. Throughout this process we have consulted with Historic England, as well local officers at Kent County Council regarding Historic Environment Records (in line with para 4.9.5 Coastal Access Scheme) to ensure that our proposals would not have a detrimental effect on designated and local heritage assets.

Report IGR 9 passes nearby two designated Scheduled Monuments (Artillery Castle at Upnor and Cockham Wood Fort), three listed structures (anti-tank cubes and pillboxes) as well as through one conservation area (Upnor). There are no proposals for new infrastructure on or nearby the Scheduled Monuments or listed structures, therefore further liaison with Historic England will not be necessary prior to establishment of the proposals between Frindsbury and Burnt House Farm.

Within the Upnor Conservation Area, our proposals will include installing new signs on an existing walked route, the regional walking route - Saxon Shore Way. Medway Council, the relevant Access Authority establishing the trail, if approved, will therefore liaise with the Medway Council team responsible for the conservation area, to ensure that the design and location of the signs are in keeping with the designation.

Other representations

Representation ID:	MCA/IGRStretch/R/2/IGR2959
Organisation/ person making representation:	[Redacted]
Name of site:	Whole route
Report map reference:	Whole route

Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.
<p>Summary of representation:</p> <p>The reports only makes passing reference to cycling. Unlike other parts of the Thames and the Kent coast, there is no official cycling trail along the shoreline between Whitstable and Dartford. National Cycle Network 1 is mainly away from the shore, except in Riverside Country Park. The England Coast Path route should be open to cycling, unless there is a good reason otherwise. Barriers should be removed along the route and surfaces could be improved in the long term. Making the route better for cycling would make it better for disabled access.</p>	
<p>Natural England's comment:</p> <p><u>Right to cycle</u></p> <p>In line with the Coastal Access duty to create clear and consistent public access rights along the coast for open-air recreation on foot, our reports to the Secretary of State set out proposals for a walking route only. Coastal access rights include most types of recreation on foot or by wheelchair including walking, climbing and picnicking. However, there are general restrictions on the scope of coastal access rights which are called "national restrictions", for example the coastal access rights do not normally include camping, horse riding or cycling. This does not prevent such recreational uses taking place by virtue of an existing right, with the landowner's permission or by traditional tolerance (sections 2.4.1 and 2.4.2 of the Coastal Access Scheme). Where there are existing higher rights along our proposed trail (such as the existence of bridleways, cycle tracks, public highway), we have highlighted those additional rights in the proposals table and associated maps within each of the 12 reports.</p> <p>In preparing the report, we met with local stakeholders to explore any issues and opportunities the England Coast Path presented. This included the Kent Countryside Access Forum (KCAF) and Medway Local Access Forum, who did not raise any specific aspirations about establishing new cycling rights along this stretch of coast. We also raised the potential for the dedication of higher rights with land owners affected by the trail. Whether or not to dedicate higher rights in this way is a decision for the landowners, not Natural England.</p> <p>Nonetheless, we note [redacted]'s points and have forwarded them to both the Medway and Kent Access Fora for their consideration, in relation to implementing their Rights of Way Improvement Plans. Any new rights to cycle along the England Coast Path in future would need to be negotiated with the relevant landowners before proceeding with either a direction to relax general restrictions, or a dedication under S16 of the CROW Act.</p> <p><u>Barriers to access</u></p> <p>In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.</p> <p>Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access such as replacing stiles with kissing gates or replacing kissing gates with gaps (section 4.3.10 of the Coastal Access Scheme). Land management requirements and local circumstances sometimes prohibit the removal of all gates, and we have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.</p>	

Representation ID:	MCA/IGRStretch/R/3/IGR0008
Organisation/ person making representation:	The Disabled Ramblers [Redacted]
Name of site:	Whole route
Report map reference:	Whole route
Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.
<p>Summary of representation:</p> <p>[Redacted] notes that it was really encouraging to read of the positive changes being proposed to improve access for mobility vehicles as well as why it is not possible to improve matters in certain places. [Redacted] appreciates that Natural England will consider more accessible options when change is made to some sections of the route in the near future.</p> <p>[Redacted] was also really pleased to read of the inclusion of some step-free routes that will be sign-posted to get around some unavoidable barriers and she thanks Natural England for our hard work on this, and for helping to open up the opportunities available to those with limited mobility.</p>	
<p>Natural England's comment:</p> <p><u>Accessibility</u></p> <p>We welcome the positive engagement from [redacted] during the development of our proposals and the supportive comments made by The Disabled Ramblers' Association.</p> <p>In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.</p> <p>Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access and leaving gaps or signposting step-free routes (section 4.3.10 of the Coastal Access Scheme). We have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.</p> <p>In regard to the mention of future changes to the route, this comment is likely to be related to the potential roll-back identified in the reports. With any new route, Natural England and the relevant Access Authority (Kent County Council) would seek to identify the most accessible route, balanced against the key principles described above, for the new trail alignment.</p>	

Length Report IGR10

Full representations

Representation number:	MCA/IGR10/R/3/IGR2397
Organisation/ person making representation:	Ramblers [Redacted], Coastal Access Officer for Kent
Route section(s) specific to this representation:	Report IGR 10
Other reports within stretch to which this representation also relates:	N/A
Representation in full	
The Ramblers fully support the proposed route along this section of the Coast Path. We would hope that if the opportunity should ever come up during the redevelopment of the old Kingsnorth Power Station, that the route would be realigned along the bank of the Medway.	
Natural England's comments	
We have welcomed the positive engagement from the [redacted] during the development of our proposals.	

Representation number:	MCA/IGR Stretch/R/1/IGR2405
Organisation/ person making representation:	Historic England [Redacted], Assistant Inspector of Ancient Monuments
Route section(s) specific to this representation:	Whole Stretch
Other reports within stretch to which this representation also relates:	IGR 1, IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 11, IGR 12. There are more specific comments on the four scheduled monuments which appear in reports IGR 6, IGR 8, IGR 9 and IGR 12.
Representation in full	
Historic England are making a representation about this report as we are a statutory consultee, and advise in particular on proposals that affect designated monuments (e.g. scheduled monuments, listed buildings). Please find our advice and recommendations below.	
We do not have any objections to the Iwade - Grain proposal as we think it is in general a low impact proposal that will cause little to no harm to heritage significance. However the advice below does highlight those more historically sensitive areas of the route; whether other permissions/consents may be required for works in them (e.g. Scheduled Monument Consent); and advice on how to limit harm to the historic environment in general.	
The path as proposed passes through the following scheduled monuments: <ul style="list-style-type: none"> World War II Heavy Anti-aircraft gunsite (TS3) at Wetham Green, 460m north of Red Brick Cottage (List Entry Ref: 1020387) Chatham Lines, section at Chatham Gun Wharf (List Entry Ref: 1021379) Cockham Wood Fort (List Entry Ref: 1003362) Coastal Artillery Defences on the Isle of Grain (List Entry Ref: 1019955) 	
The path also passes over or near the following listed structures: <ul style="list-style-type: none"> Passes over grade II Rochester Bridge (List Entry Ref: 1086431) 	

- Passes close to a number of grade II listed anti-tank cubes (List Entry Ref: 1393814) and pillboxes (List Entry Refs: 1393816 & 1393815) and the grade II Grain Crossing Signalling Box (List Entry Ref: 1415162)

The path also goes through the following conservation areas:

- Lower Halstow, Swale
- Upnor
- Chatham historic dockyard
- Brompton lines
- Star hill to Sun Pier, Medway
- Frindsbury and Manor Farm

The above summary provides an overview of all designated assets that have the potential to be impacted by the proposal (although we think the actual impact is likely to be low-nil).

In terms of the scheduled monuments, Scheduled Monument Consent (SMC) would only be required if any new installations (e.g. signage) are to be placed in the scheduled area; or if the introduction of new paths/use of existing paths through the scheduled area will involve any additions (e.g. new surfacing) or any ground disturbance (e.g. digging to create/resurface paths). If this is the case, Natural England will need to apply for SMC to Historic England in advance of any works in the scheduled areas commencing.

You should consult the local conservation officer with regards to impact upon the setting of grade II listed buildings or conservation areas. Finally, you should also consult the county archaeologist about impacts to non-designated archaeology.

Natural England's comments

We welcome the positive engagement from Historic England during the development of our proposals – and their supportive comments. Throughout this process we have consulted with Historic England, as well local officers at Kent County Council regarding Historic Environment Records (in line with para 4.9.5 Coastal Access Scheme) to ensure that our proposals would not have a detrimental effect on designated and local heritage assets.

Report IGR 10 does not contain any designated Scheduled Monuments or conservation areas, therefore no consents or further liaison with Historic England will be necessary prior to establishment of the proposals between Burnt House Farm and Stoke Creek Crossing.

Other representations

Representation ID:	MCA/IGR10/R/1/IGR2957
Organisation/ person making representation:	[Redacted]
Name of site:	Burnt House Farm to Stoke Creek Crossing
Report map reference:	Map IGR 10a and Map IGR 10b
Route sections on or adjacent to the land:	IGR-10-S007 to IGR-10-S009 (North Street Farm)
Other reports within stretch to which this representation also relates	N/A

Summary of representation:

Route sections IGR-10-S007 to IGR-10-S009 are very muddy and slippery. It is a shame the coast path is not aligned on the seawall in front of Amazon's warehouse car park which is an interesting part of the coast. This would also avoid the level crossing south of Tudor Farm.

[Redacted] also notes that the reports are an impressive set of documents, and as a keen walker (having walked most of the coastal route from Greenwich to Plymouth and nearly all the South West Coast Path) she would like to congratulate Natural England on all their hard work.

Natural England's comment:

We welcome the positive comments from [redacted] and the recognition of the hard work that has gone into publishing the Iwade to Grain England Coast Path stretch.

Condition of the proposed path

We welcome the feedback regarding the condition of sections IGR-10-S007 to IGR-10-S009 of the proposed route. These sections are all managed as part of Medway's rights of way network and were of a suitable condition when we visited the site, during the development phase of our proposals. On receiving [redacted]'s representation, Natural England contacted the Access Authority, Medway Council, and the landowner of the aforementioned sections about the reported muddy and slippery condition of the existing right of way. It appears that the bridleway/ proposed route had been recently churned up by farm machinery. Medway Council have since advised the landowner to ask the tenant farmer to level off the ruts to ensure users can access the route. As Medway Council will establish the trail on the ground, if the Secretary of State approves our proposals, it will review the state of this part of the trail to ensure it is in a suitable condition, prior to opening it as the England Coast Path.

Amazon seawall

Natural England agrees with [redacted] about the public benefit of aligning the Coast Path on the seawall near the Amazon warehouse, by continuing eastwards along the road and fields from the easternmost section of IGR-10-S005 to reach the seawall. During the development of our proposals we considered various options, including this suggested route in the vicinity of the Kingsnorth Industrial Estate – now known as the Kingsnorth & London Medway Commercial Park.

Medway Council and the landowner informed us that public access is specifically and permanently prohibited from parts of the Commercial Park, including the seawall near the Amazon site. This is as a result of an historic planning condition related to the 1994 development of a power station. Such provisions made through planning legislation remove the right to align the trail here or exercise any coastal access rights.

There were no other options available to join up IGR-10-S005 with the seawall footpath south of the railway line, therefore we proposed the published inland route, which provides some excellent elevated views of the Medway Estuary.

Tudor Farm level crossing

As a point of clarification, we have *not* proposed to align the Coast Path over the level crossing south of Tudor Farm, as mentioned by [redacted]. The proposed route crosses the railway line at the Stoke Creek level crossing, to the east – which is an existing pedestrian crossing point established by Network Rail. During the development of our proposals, we discussed the option of creating a new pedestrian crossing point at the level crossing south of Tudor Farm with Network Rail, and were advised that this level crossing was not suitable for pedestrian access due to rail safety concerns. Given the lack of an alternative in this area, we opted for the published route across Stoke Creek level crossing.

All the options considered in this area have been documented in the report IGR 10 in table 10.3.2 (page 9).

Representation ID:	MCA/IGR10/R/2/IGR2414
Organisation/ person making representation:	Hoo St Werburgh Parish Council, [redacted]
Name of site:	Burnt House Farm to Stoke Creek Crossing
Report map reference:	Map IGR 10a and Map IGR 10b
Route sections on or adjacent to the land:	IGR-10-S007 to IGR-10-S009 (North Street Farm)
Other reports within stretch to which this representation also relates	N/A
<p>Summary of representation:</p> <p>Route sections IGR-10-S007 to IGR-10-S009 are very muddy and slippery. It is a shame the coast path is not aligned on the seawall in front of Amazon's warehouse car park which is an interesting part of the coast. This would also avoid the level crossing south of Tudor Farm.</p> <p>[Redacted] also notes that the reports are an impressive set of documents, and as a keen walker (having walked most of the coastal route from Greenwich to Plymouth and nearly all the South West Coast Path) she would like to congratulate Natural England on all their hard work.</p>	
<p>Natural England's comment:</p> <p>We welcome the positive comments from [redacted] and the recognition of the hard work that has gone into publishing the Iwade to Grain England Coast Path stretch.</p> <p><u>Condition of the proposed path</u></p> <p>We welcome the feedback regarding the condition of sections IGR-10-S007 to IGR-10-S009 of the proposed route. These sections are all managed as part of Medway's rights of way network and were of a suitable condition when we visited the site, during the development phase of our proposals. On receiving [redacted]'s representation, Natural England contacted the Access Authority, Medway Council, and the landowner of the aforementioned sections about the reported muddy and slippery condition of the existing right of way. It appears that the bridleway/ proposed route had been recently churned up by farm machinery. Medway Council have since advised the landowner to ask the tenant farmer to level off the ruts to ensure users can access the route. As Medway Council will establish the trail on the ground, if the Secretary of State approves our proposals, they will review the state of this part of the trail to ensure it is in a suitable condition, prior to opening it as the England Coast Path.</p> <p><u>Amazon seawall</u></p> <p>Natural England agrees with [redacted] about the public benefit of aligning the Coast Path on the seawall near Amazon, by continuing eastwards along the road and fields from the easternmost section of IGR-10-S005 to reach the seawall. During the development of our proposals we considered various options, including this suggested route in the vicinity of the Kingsnorth Industrial Estate – now known as the Kingsnorth & London Medway Commercial Park.</p> <p>Medway Council and the landowner informed us that public access is specifically and permanently prohibited from parts of the Commercial Park, including the seawall near the Amazon site. This is as a result of an historic planning condition related to the 1994 development of a power station. Such provisions made through planning legislation remove the right to align the trail here or exercise any coastal access rights.</p> <p>There were no other options available to join up IGR-10-S005 with the seawall footpath south of the railway line, therefore we proposed the published inland route, which provides some excellent elevated views of the Medway Estuary.</p> <p><u>Tudor Farm level crossing</u></p> <p>As a point of clarification, we have <i>not</i> proposed to align the Coast Path over the level crossing south of Tudor Farm, as mentioned by [redacted]. The proposed route crosses the railway line at the Stoke Creek level crossing, to the east – which is an existing pedestrian crossing point established by</p>	

Network Rail. During the development of our proposals, we discussed the option of creating a new pedestrian crossing point at the level crossing south of Tudor Farm with Network Rail, and were advised that this level crossing was not suitable for pedestrian access due to rail safety concerns. Given the lack of alternative in this area, we opted for the published route across Stoke Creek level crossing.

All the options considered in this area have been documented in the report IGR 10 in table 10.3.2 (page 9).

Representation ID:	MCA/IGR10/R/4/IGR2764
Organisation/ person making representation:	Rochester Diocesan Society and Board of Finance [Redacted]
Name of site:	St Peter and St Paul's Church, Upper Stoke
Report map reference:	Map IGR 10b
Route sections on or adjacent to the land:	IGR-10-S0013 to IGR-10-S019
Other reports within stretch to which this representation also relates	N/A
<p>Summary of representation: Although the walk around the boundary of the Church is a pleasant experience for walkers, this is not an ideal route because of the dangerous corner on the south boundary of the Church. This route appears to follow a fairly high level bank fronting the Church in Stoke Road.</p> <p>A preferable route for the coast path would be to align the route along a track south of Tudor Farm (IGR-10-S012), cross over Stoke Road and then pass over the level crossing to reach the seawall.</p>	
<p>Natural England's comment: <u>Road safety near Church</u> The published route that passes near the church is off the road on a well-established footway (IGR-10-S016). The route then turns a corner to the south and is then aligned on a 30mph road (IGR-10-S017) for approximately 150m before joining a public footpath to the seawall. Medway Council's Road Safety team has assessed this route and confirmed that it is safe to use as the England Coast Path. They specifically noted that the route was on a quiet rural road (at IGR-10-S017) which is principally used by local residents and has verges either side to use for either walking or as safe refuges for stepping off the road, if required. It has good visibility throughout the route and given the predicted low increase in footfall from the England Coast Path, they concluded that there would be an insignificant increase in risk to safety. It is already used by local residents of Upper Stoke to access the seawall on foot (see Strava Heatmap). The route does not follow a bank on Stoke Road, and we are unclear about the area that [redacted] refers to in [redacted] representation.</p> <p><u>Suggested route south of Tudor Farm</u> During the development of our proposals, we discussed the option of creating a new pedestrian crossing point at the level crossing south of Tudor Farm with Network Rail, and were advised that this level crossing was not suitable for pedestrian access due to rail safety concerns. Given the lack of alternative in this area, we opted for the published route across Stoke Creek level crossing.</p>	

Representation ID:	MCA/IGRStretch/R/2/IGR2959
Organisation/ person making representation:	[Redacted]
Name of site:	Whole route

Report map reference:	Whole route
Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.
<p>Summary of representation:</p> <p>The reports only makes passing reference to cycling. Unlike other parts of the Thames and the Kent coast, there is no official cycling trail along the shoreline between Whitstable and Dartford. National Cycle Network 1 is mainly away from the shore, except in Riverside Country Park. The England Coast Path route should be open to cycling, unless there is a good reason otherwise. Barriers should be removed along the route and surfaces could be improved in the long term. Making the route better for cycling would make it better for disabled access.</p>	
<p>Natural England's comment:</p> <p><u>Right to cycle</u></p> <p>In line with the Coastal Access duty to create clear and consistent public access rights along the coast for open-air recreation on foot, our reports to the Secretary of State set out proposals for a walking route only. Coastal access rights include most types of recreation on foot or by wheelchair including walking, climbing and picnicking. However, there are general restrictions on the scope of coastal access rights which are called "national restrictions", for example the coastal access rights do not normally include camping, horse riding or cycling. This does not prevent such recreational uses taking place by virtue of an existing right, with the landowner's permission or by traditional tolerance (sections 2.4.1 and 2.4.2 of the Coastal Access Scheme). Where there are existing higher rights along our proposed trail (such as the existence of bridleways, cycle tracks, public highway), we have highlighted those additional rights in the proposals table and associated maps within each of the 12 reports.</p> <p>In preparing the report, we met with local stakeholders to explore any issues and opportunities the England Coast Path presented. This included the Kent Countryside Access Forum (KCAF) and Medway Local Access Forum, who did not raise any specific aspirations about establishing new cycling rights along this stretch of coast. We also raised the potential for the dedication of higher rights with land owners affected by the trail. Whether or not to dedicate higher rights in this way is a decision for the landowners, not Natural England.</p> <p>Nonetheless, we note [redacted]'s points and have forwarded them to both the Medway and Kent Access Fora for their consideration, in relation to implementing their Rights of Way Improvement Plans. Any new rights to cycle along the England Coast Path in future would need to be negotiated with the relevant landowners before proceeding with either a direction to relax general restrictions, or a dedication under S16 of the CROW Act.</p> <p><u>Barriers to access</u></p> <p>In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.</p> <p>Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access such as replacing stiles with kissing gates or replacing kissing gates with gaps (section 4.3.10 of the Coastal Access Scheme). Land management requirements and local circumstances sometimes prohibit the removal of all gates, and we have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.</p>	

Representation ID:	MCA/IGRStretch/R/3/IGR0008
Organisation/ person making representation:	The Disabled Ramblers [Redacted]
Name of site:	Whole route
Report map reference:	Whole route
Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.
<p>Summary of representation:</p> <p>[Redacted] notes that it was really encouraging to read of the positive changes being proposed to improve access for mobility vehicles as well as why it is not possible to improve matters in certain places. [Redacted] appreciates that Natural England will consider more accessible options when change is made to some sections of the route in the near future.</p> <p>[Redacted] was also really pleased to read of the inclusion of some step-free routes that will be sign-posted to get around some unavoidable barriers and she thanks Natural England for our hard work on this, and for helping to open up the opportunities available to those with limited mobility.</p>	
<p>Natural England's comment:</p> <p><u>Accessibility</u></p> <p>We welcome the positive engagement from [redacted] during the development of our proposals and the supportive comments made by The Disabled Ramblers' Association.</p> <p>In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.</p> <p>Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access and leaving gaps or signposting step-free routes (section 4.3.10 of the Coastal Access Scheme). We have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.</p> <p>In regard to the mention of future changes to the route, this comment is likely to be related to the potential roll-back identified in the reports. With any new route, Natural England and the relevant Access Authority (Kent County Council) would seek to identify the most accessible route, balanced against the key principles described above, for the new trail alignment.</p>	

Length Report IGR11

Full representations

Representation number:	MCA/IGR11/R/1/IGR2397
Organisation/ person making representation:	Ramblers [Redacted], Coastal Access Officer for Kent
Route section(s) specific to this representation:	Report IGR 11
Other reports within stretch to which this representation also relates:	N/A
Representation in full	
The Ramblers fully support the proposed route along this section of the Coast Path. In particular we are pleased to note the provision of a new footway alongside the A228 Grain Road.	
Natural England's comments	
We have welcomed the positive engagement from the [redacted] during the development of our proposals.	

Representation number:	MCA/IGR Stretch/R/1/IGR2405
Organisation/ person making representation:	Historic England [Redacted], Assistant Inspector of Ancient Monuments
Route section(s) specific to this representation:	Whole Stretch
Other reports within stretch to which this representation also relates:	IGR 1, IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 12. There are more specific comments on the four scheduled monuments which appear in reports IGR 6, IGR 8, IGR 9 and IGR 12.
Representation in full	
<p>Historic England are making a representation about this report as we are a statutory consultee, and advise in particular on proposals that affect designated monuments (e.g. scheduled monuments, listed buildings). Please find our advice and recommendations below.</p> <p>We do not have any objections to the Iwade - Grain proposal as we think it is in general a low impact proposal that will cause little to no harm to heritage significance. However the advice below does highlight those more historically sensitive areas of the route; whether other permissions/consents may be required for works in them (e.g. Scheduled Monument Consent); and advice on how to limit harm to the historic environment in general.</p> <p>The path as proposed passes through the following scheduled monuments:</p> <ul style="list-style-type: none"> • World War II Heavy Anti-aircraft gunsite (TS3) at Wetham Green, 460m north of Red Brick Cottage (List Entry Ref: 1020387) • Chatham Lines, section at Chatham Gun Wharf (List Entry Ref: 1021379) • Cockham Wood Fort (List Entry Ref: 1003362) • Coastal Artillery Defences on the Isle of Grain (List Entry Ref: 1019955) <p>The path also passes over or near the following listed structures:</p> <ul style="list-style-type: none"> • Passes over grade II Rochester Bridge (List Entry Ref: 1086431) 	

- Passes close to a number of grade II listed anti-tank cubes (List Entry Ref: 1393814) and pillboxes (List Entry Refs: 1393816 & 1393815) and the grade II Grain Crossing Signalling Box (List Entry Ref: 1415162)

The path also goes through the following conservation areas:

- Lower Halstow, Swale
- Upnor
- Chatham historic dockyard
- Brompton lines
- Star hill to Sun Pier, Medway
- Frindsbury and Manor Farm

The above summary provides an overview of all designated assets that have the potential to be impacted by the proposal (although we think the actual impact is likely to be low-nil).

In terms of the scheduled monuments, Scheduled Monument Consent (SMC) would only be required if any new installations (e.g. signage) are to be placed in the scheduled area; or if the introduction of new paths/use of existing paths through the scheduled area will involve any additions (e.g. new surfacing) or any ground disturbance (e.g. digging to create/resurface paths). If this is the case, Natural England will need to apply for SMC to Historic England in advance of any works in the scheduled areas commencing.

You should consult the local conservation officer with regards to impact upon the setting of grade II listed buildings or conservation areas. Finally, you should also consult the county archaeologist about impacts to non-designated archaeology.

Natural England's comments

We welcome the positive engagement from Historic England during the development of our proposals – and their supportive comments. Throughout this process we have consulted with Historic England, as well local officers at Kent County Council regarding Historic Environment Records (in line with para 4.9.5 Coastal Access Scheme) to ensure that our proposals would not have a detrimental effect on designated and local heritage assets.

Report IGR 11 does not contain any designated Scheduled Monuments, conservation areas or listed structures, therefore no consents or further liaison with Historic England will be necessary prior to establishment of the proposals between Stoke Creek Crossing and Grain Crossing.

Other representations

Representation ID:	MCA/IGRStretch/R/2/IGR2959
Organisation/ person making representation:	[Redacted]
Name of site:	Whole route
Report map reference:	Whole route
Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.

Summary of representation:

The reports only makes passing reference to cycling. Unlike other parts of the Thames and the Kent coast, there is no official cycling trail along the shoreline between Whitstable and Dartford. National Cycle Network 1 is mainly away from the shore, except in Riverside Country Park. The England Coast Path route should be open to cycling, unless there is a good reason otherwise. Barriers should be removed along the route and surfaces could be improved in the long term. Making the route better for cycling would make it better for disabled access.

Natural England's comment:**Right to cycle**

In line with the Coastal Access duty to create clear and consistent public access rights along the coast for open-air recreation on foot, our reports to the Secretary of State set out proposals for a walking route only. Coastal access rights include most types of recreation on foot or by wheelchair including walking, climbing and picnicking. However, there are general restrictions on the scope of coastal access rights which are called "national restrictions", for example the coastal access rights do not normally include camping, horse riding or cycling. This does not prevent such recreational uses taking place by virtue of an existing right, with the landowner's permission or by traditional tolerance (sections 2.4.1 and 2.4.2 of the Coastal Access Scheme). Where there are existing higher rights along our proposed trail (such as the existence of bridleways, cycle tracks, public highway), we have highlighted those additional rights in the proposals table and associated maps within each of the 12 reports.

In preparing the report, we met with local stakeholders to explore any issues and opportunities the England Coast Path presented. This included the Kent Countryside Access Forum (KCAF) and Medway Local Access Forum, who did not raise any specific aspirations about establishing new cycling rights along this stretch of coast. We also raised the potential for the dedication of higher rights with land owners affected by the trail. Whether or not to dedicate higher rights in this way is a decision for the landowners, not Natural England.

Nonetheless, we note [redacted]'s points and have forwarded them to both the Medway and Kent Access Fora for their consideration, in relation to implementing their Rights of Way Improvement Plans. Any new rights to cycle along the England Coast Path in future would need to be negotiated with the relevant landowners before proceeding with either a direction to relax general restrictions, or a dedication under S16 of the CROW Act.

Barriers to access

In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.

Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access such as replacing stiles with kissing gates or replacing kissing gates with gaps (section 4.3.10 of the Coastal Access Scheme). Land management requirements and local circumstances sometimes prohibit the removal of all gates, and we have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.

Representation ID:	MCA/IGRStretch/R/3/IGR0008
Organisation/ person making representation:	The Disabled Ramblers [Redacted]
Name of site:	Whole route

Report map reference:	Whole route
Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.
<p>Summary of representation:</p> <p>[Redacted] notes that it was really encouraging to read of the positive changes being proposed to improve access for mobility vehicles as well as why it is not possible to improve matters in certain places. [Redacted] appreciates that Natural England will consider more accessible options when change is made to some sections of the route in the near future.</p> <p>[Redacted] was also really pleased to read of the inclusion of some step-free routes that will be sign-posted to get around some unavoidable barriers and she thanks Natural England for our hard work on this, and for helping to open up the opportunities available to those with limited mobility.</p> <p>Natural England's comment:</p> <p><u>Accessibility</u></p> <p>We welcome the positive engagement from [redacted] during the development of our proposals and the supportive comments made by The Disabled Ramblers' Association.</p> <p>In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.</p> <p>Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access and leaving gaps or signposting step-free routes (section 4.3.10 of the Coastal Access Scheme). We have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.</p> <p>In regard to the mention of future changes to the route, this comment is likely to be related to the potential roll-back identified in the reports. With any new route, Natural England and the relevant Access Authority (Kent County Council) would seek to identify the most accessible route, balanced against the key principles described above, for the new trail alignment.</p>	

Length Report IGR12

Representation number:	MCA/IGR12/R/1/IGR2397
Organisation/ person making representation:	Ramblers [Redacted], Coastal Access Officer for Kent
Route section(s) specific to this representation:	Report IGR 12
Other reports within stretch to which this representation also relates:	N/A
Representation in full	
The Ramblers fully support the proposed route along this section of the Coast Path.	
Natural England's comments	
We have welcomed the positive engagement from the [redacted] during the development of our proposals.	

Representation number:	MCA/IGR Stretch/R/1/IGR2405
Organisation/ person making representation:	Historic England [Redacted], Assistant Inspector of Ancient Monuments
Route section(s) specific to this representation:	Whole Stretch
Other reports within stretch to which this representation also relates:	IGR 1, IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11. There are more specific comments on the four scheduled monuments which appear in reports IGR 6, IGR 8, IGR 9 and IGR 12.
Representation in full	
<p>Historic England are making a representation about this report as we are a statutory consultee, and advise in particular on proposals that affect designated monuments (e.g. scheduled monuments, listed buildings). Please find our advice and recommendations below.</p> <p>We do not have any objections to the Iwade - Grain proposal as we think it is in general a low impact proposal that will cause little to no harm to heritage significance. However the advice below does highlight those more historically sensitive areas of the route; whether other permissions/consents may be required for works in them (e.g. Scheduled Monument Consent); and advice on how to limit harm to the historic environment in general.</p> <p>The path as proposed passes through the following scheduled monuments:</p> <ul style="list-style-type: none"> • World War II Heavy Anti-aircraft gunsite (TS3) at Wetham Green, 460m north of Red Brick Cottage (List Entry Ref: 1020387) • Chatham Lines, section at Chatham Gun Wharf (List Entry Ref: 1021379) • Cockham Wood Fort (List Entry Ref: 1003362) • Coastal Artillery Defences on the Isle of Grain (List Entry Ref: 1019955) <p>The path also passes over or near the following listed structures:</p> <ul style="list-style-type: none"> • Passes over grade II Rochester Bridge (List Entry Ref: 1086431) • Passes close to a number of grade II listed anti-tank cubes (List Entry Ref: 1393814) and pillboxes (List Entry Refs: 1393816 & 1393815) and the grade II Grain Crossing Signalling Box (List Entry Ref: 1415162) 	

The path also goes through the following conservation areas:

- Lower Halstow, Swale
- Upnor
- Chatham historic dockyard
- Brompton lines
- Star hill to Sun Pier, Medway
- Frindsbury and Manor Farm

The above summary provides an overview of all designated assets that have the potential to be impacted by the proposal (although we think the actual impact is likely to be low-nil).

In terms of the scheduled monuments, Scheduled Monument Consent (SMC) would only be required if any new installations (e.g. signage) are to be placed in the scheduled area; or if the introduction of new paths/use of existing paths through the scheduled area will involve any additions (e.g. new surfacing) or any ground disturbance (e.g. digging to create/resurface paths). If this is the case, Natural England will need to apply for SMC to Historic England in advance of any works in the scheduled areas commencing.

You should consult the local conservation officer with regards to impact upon the setting of grade II listed buildings or conservation areas. Finally, you should also consult the county archaeologist about impacts to non-designated archaeology.

Natural England's comments

We welcome the positive engagement from Historic England during the development of our proposals – and their supportive comments. Throughout this process we have consulted with Historic England, as well local officers at Kent County Council regarding Historic Environment Records (in line with para 4.9.5 Coastal Access Scheme) to ensure that our proposals would not have a detrimental effect on designated and local heritage assets.

Report IGR 12 passes through one designated Scheduled Monument (Coastal Artillery Defences on the Isle of Grain) in addition to passing nearby one grade II listed structure (Grain Crossing Signalling Box). There are no proposals to install new infrastructure near the listed structure, however we do propose to install new signs near (but not on) the Scheduled Monument. Therefore we will liaise with Historic England regarding whether a consent will be needed prior to establishment of the proposals between Grain Crossing and Grain Esplanade.

Other representations

Representation ID:	MCA/IGRStretch/R/2/IGR2959
Organisation/ person making representation:	[Redacted]
Name of site:	Whole route
Report map reference:	Whole route
Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.
Summary of representation:	

The reports only makes passing reference to cycling. Unlike other parts of the Thames and the Kent coast, there is no official cycling trail along the shoreline between Whitstable and Dartford. National Cycle Network 1 is mainly away from the shore, except in Riverside Country Park. The England Coast Path route should be open to cycling, unless there is a good reason otherwise. Barriers should be removed along the route and surfaces could be improved in the long term. Making the route better for cycling would make it better for disabled access.

Natural England's comment:

Right to cycle

In line with the Coastal Access duty to create clear and consistent public access rights along the coast for open-air recreation on foot, our reports to the Secretary of State set out proposals for a walking route only. Coastal access rights include most types of recreation on foot or by wheelchair including walking, climbing and picnicking. However, there are general restrictions on the scope of coastal access rights which are called "national restrictions", for example the coastal access rights do not normally include camping, horse riding or cycling. This does not prevent such recreational uses taking place by virtue of an existing right, with the landowner's permission or by traditional tolerance (sections 2.4.1 and 2.4.2 of the Coastal Access Scheme). Where there are existing higher rights along our proposed trail (such as the existence of bridleways, cycle tracks, public highway), we have highlighted those additional rights in the proposals table and associated maps within each of the 12 reports.

In preparing the report, we met with local stakeholders to explore any issues and opportunities the England Coast Path presented. This included the Kent Countryside Access Forum (KCAF) and Medway Local Access Forum, who did not raise any specific aspirations about establishing new cycling rights along this stretch of coast. We also raised the potential for the dedication of higher rights with land owners affected by the trail. Whether or not to dedicate higher rights in this way is a decision for the landowners, not Natural England.

Nonetheless, we note [redacted]'s points and have forwarded them to both the Medway and Kent Access Fora for their consideration, in relation to implementing their Rights of Way Improvement Plans. Any new rights to cycle along the England Coast Path in future would need to be negotiated with the relevant landowners before proceeding with either a direction to relax general restrictions, or a dedication under S16 of the CROW Act.

Barriers to access

In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.

Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access such as replacing stiles with kissing gates or replacing kissing gates with gaps (section 4.3.10 of the Coastal Access Scheme). Land management requirements and local circumstances sometimes prohibit the removal of all gates, and we have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.

Representation ID:	MCA/IGRStretch/R/3/IGR0008
Organisation/ person making representation:	The Disabled Ramblers [Redacted]
Name of site:	Whole route
Report map reference:	Whole route

Route sections on or adjacent to the land:	N/A
Other reports within stretch to which this representation also relates	IGR 2, IGR 3, IGR 4, IGR 5, IGR 6, IGR 7, IGR 8, IGR 9, IGR 10, IGR 11, IGR 12.
<p>Summary of representation:</p> <p>[Redacted] notes that it was really encouraging to read of the positive changes being proposed to improve access for mobility vehicles as well as why it is not possible to improve matters in certain places. [Redacted] appreciates that Natural England will consider more accessible options when change is made to some sections of the route in the near future.</p> <p>[Redacted] was also really pleased to read of the inclusion of some step-free routes that will be sign-posted to get around some unavoidable barriers and she thanks Natural England for our hard work on this, and for helping to open up the opportunities available to those with limited mobility.</p>	
<p>Natural England's comment:</p> <p><u>Accessibility</u></p> <p>We welcome the positive engagement from [redacted] during the development of our proposals and the supportive comments made by The Disabled Ramblers' Association.</p> <p>In developing our proposals for the England Coast Path we seek to balance the key principles set out in the statutory criteria for establishing the trail, namely: closeness to the sea (or estuary), sea views, safety and convenience (see section 4.1 of the Coastal Access Scheme). In doing this we always seek to avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.</p> <p>Where there is a choice of routes (and taking into account the key principles outlined above), we will generally favour the one that is accessible to the widest range of people or most easily adapted for that purpose (section 4.3.8 of the Coastal Access Scheme). In addition and where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility, such as removing barriers to access and leaving gaps or signposting step-free routes (section 4.3.10 of the Coastal Access Scheme). We have indicated where we intend to remove barriers to access in the Accessibility section of each of the 12 reports.</p> <p>In regard to the mention of future changes to the route, this comment is likely to be related to the potential roll-back identified in the reports. With any new route, Natural England and the relevant Access Authority (Kent County Council) would seek to identify the most accessible route, balanced against the key principles described above, for the new trail alignment.</p>	

5. Supporting documents

Length 1

Supporting Document 5A: MCA/IGR1/R/1/IGR2874

Site meeting notes dates 24 December 2018

Redacted

It was nice to meet you last week at the Boat Club.

I have summarised the main points from our meeting, I hope this is helpful. Please let me know if there is anything else you would like to add.

- Your main concern was walkers accessing the area where the Boat Club's operations are carried out (boats being winched in and out of the water, boats on trailers being reversed in and out).
- We discussed the route for the England Coast Path and you are happy with the route (as shown on the attached map) if the trail is clearly way-marked to encourage walkers to stay away from the areas where the boat club operations are carried out.
- Redacted offered to supply you with some 'End of Open Access' signs that you can install at the boat club to discourage walkers from accessing the area where the Boat Club's operations are carried out. I have placed an order for these signs and will let you know when they are available.
- I explained that the proposals for the England Coast Path between Iwade and Grain are likely to be published in Spring 2019 and when that happens the Boat Club will be notified and will be able to view the report and make a comment if they wish.

If you would like to read more about the England Coast Path here is a link to '*Natural England's Coastal Access Approved Scheme*' which is the methodology for implementation of the England Coast Path. Information about '*Ports, industry and other maritime facilities*' can be found in *Section 8.25*.
<http://publications.naturalengland.org.uk/publication/5327964912746496>

If you have any more questions please don't hesitate to get in touch,

Best wishes,

Redacted

England Coast Path Adviser
Sussex and Kent Area Team
southeastcoastalaccess@naturalengland.org.uk
South East Hub Coastal Access Direct Line: 0300 060 0797

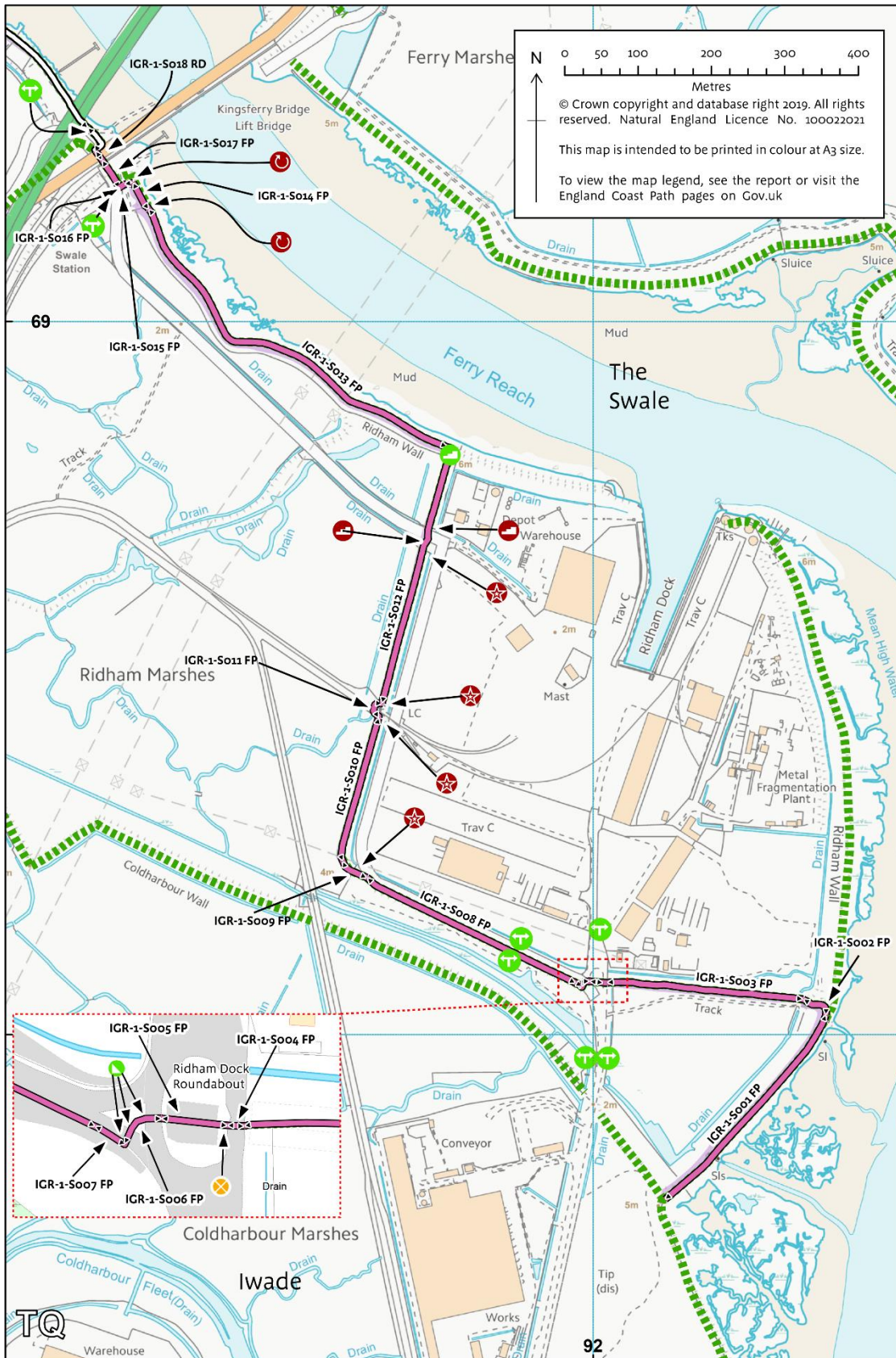
Supporting document – 5B: MCA/IGR1/R/1/IGR2874 Map IGR 1a v1.1

Proposed modification to route sections IGR-1-S014 and IGR-1-S015



Coastal Access - Iwade to Grain - Natural England's Proposals
Report IGR 1

Map IGR 1a v1.1: Ridham Dock (Iwade) to Kingsferry Bridge



Map IGR 1a: Ridham Dock (Iwade) to Kingsferry Bridge

Length 3

Supporting document – 5C: MCA/IGR3/R/3/IGR3005 Kent County Council, Highways, Transportation and Waste, Report of safety measures at Highways Interfaces, September 2018.
Site 6 – Raspberry Hill Lane near Lower Halstow

Kent County Council
Highways Transportation & Waste



England Coast Path Project



Safety Measures at Highway Interfaces

Schemes Planning and Delivery
September 2018

Introduction

The scope of this report is to carry out assessments of locations where the proposed England Coast Path (ECP) interfaces with the public highway.

13 sites were to be assessed in the boroughs of Gravesham and Swale, please see the strategic location map at the end of this introduction.

Each site was assessed in terms of levels of risk to pedestrians walking ECP at each location, from a highway safety viewpoint. The assessment considered whether the level of risk was acceptable and what mitigation measures would be appropriate to reduce risk levels.

Where mitigation measures were considered to be required, an outline design of the measures has been provided at the end of each site assessment and a budget estimate included in the text.

Please note the following:

- Budget estimates have been produced from the outline designs included in the report. Those designs are fairly detailed but each would still require to be subject to detailed design to ensure buildability and any details not considered at outline design stage.
- It is considered the requirements considered necessary for site 7/8 are too complex and detailed for a budget estimate to be included in this report. Outline designs have been included but not budget estimates.
- Budget estimates have been created using commercial rates in the KCC Highway Term Maintenance Contract (HTMC) rates and estimated rates where contract rates do not cover specific operations. To assist budgeting, 15% contingencies have been included in all estimates.
- Estimates have been compiled using 2018/19 KCC HTMC rates. HTMC rates are subject to an annual RPI increase on 1 April. Any works undertaken in financial year 2019/20 and beyond will be subject to increases above those included in this report.
- Methods of traffic management considered necessary by the author have been included in budget estimates but confirmation of requirements would need to be received by Amey Contractors as part of the detailed design process. No early contractor involvement (ECI) was carried out during the preparation of this report.
- No statutory undertakers' plant information (C2 notices) has been compiled during preparation of this report. Cost implications of any works affected by SU plant have not been included.
- The safety assessments have been carried out by the author, with the exception of sites 1 and 2, which were undertaken by [redacted]. The designs have not been subjected to an independent stage 1 road safety audit (RSA). A stage 1/2 RSA would have to be carried out on detailed designs before works implementation.
- KCC Public Rights of Way (KCC PRoW) and Natural England (NE) would be responsible for all offcarriageway elements of ECP project, including negotiations with landowners and all legal arisings. KCC PRoW would also be responsible for all ECP route direction

signs design, with all such signs intended for siting on public highway to be approved in advance by KCC Highways, Transportation and Waste, Schemes Planning and Delivery.

11

Site 6 – Raspberry Hill Lane nr. Lower Halstow

Please see drawing SPD/AP/ECP/06 at the end of this site briefing.

From Basser Hill, ECP follows footpaths across fields and along tracks until meeting Raspberry Hill Lane (RHL). It meets the lane on the outside of a bend in the road, with reverse direction bends nearby in both directions. The bend configuration and the presence of vegetation in verges and on private land adjacent RHL result in poor visibility in both directions, ruling out a safe road crossing at the point where the footpath meets RHL.

It is proposed to create a footpath in the field adjacent RHL on the southeast side, until it meets an existing field access. NE and KCC PRoW would negotiate the creation of the coast path with the landowner. The field access is approximately halfway along a length of straight carriageway, affording good visibility in both directions on both sides of the road. At this point, the proposed footpath would cross RHL, turn and continue along the north-western verge in a north-easterly direction. Improvements to the verge would be required to create a suitable footpath and would be designed and created by KCC PRoW.

The proposed crossing point would be without kerbing or any hard-standings and indicated to walkers by direction signing introduced by KCC PRoW.

‘Pedestrians crossing’ signs would be installed on the Raspberry Hill Lane and Sheerness Road approaches to enhance pedestrian safety.

[Redacted]

