

Coastal Access – Bamburgh to the Scottish Border (including Holy Island), lengths BBS1, BBS2 and BBS4



November 2020

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1. Introduction

This document records the representations Natural England has received on BBS1, BBS2 and BBS4 of this compendium of reports 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 Bamburgh to Scottish Border they are included here in so far as they are relevant to lengths BBS1, BBS2 and BBS4.

2. Background

Natural England’s compendium of reports setting out its proposals for improved access to the coast at Bamburgh to the Scottish Border, comprising an overview and four 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 thirteen representations pertaining to length BBS1, BBS2 and BBS4 of the Bamburgh to Scottish Borders stretch, of which eight 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. Section 4 includes these ‘full’ representations in their entirety, a summary of the five representations made by other individuals or organisations, referred to as ‘other’ representations, and Natural England’s comments on all representations. Section 5 contains the supporting documents referenced in 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 section 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. Record of 'full' and 'other' representations and Natural England's comments on them

Overview

Other Representations

Representation ID:

MCA/Overview/R/1/BBS0552

Organisation/ person making representation:

(Lichfields on behalf of Bourne Leisure)

Name of site:

Overview document with reference to BBS-4-S009

Report map reference:

N/A

Route sections on or adjacent to the land:

N/A

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

Background

In March 2017 Natural England engaged with Lichfields (with Lichfields acting as planning agent, representing the interests of Bourne Leisure Limited, the owner of Berwick Holiday Park). The proposals in the vicinity of Berwick Holiday Park were discussed on site, and Bourne Leisure endorsed the proposed route. The proposed route lies outside but adjacent to Berwick Holiday Park.

Rollback

In relation to the matter of 'rollback', the Overview report states on page 27 that in determining the new route, Natural England will take into account "any views expressed by people with a relevant interest in affected land" but does not specifically state that Natural England will contact and consult with landowners.

On behalf of Bourne Leisure, we request that the Overview report is amended to specifically state that Natural England will contact and consult with owners and occupiers in relation to any rollback – including where the trail is being adjusted to follow the current feature, e.g. the beach or foreshore. This is important in order to ensure that relevant landowners are kept informed, so that any issues can be raised with Natural England and that landowners' views on any revised routes are taken into account if rollback needs to take place.

Subject to the comment above being addressed, the proposed route, as currently proposed, is endorsed.

Natural England's comment:

The detail in the Shoreline Management plan and the Environment Agencies estimated shoreline retreat distance is that at this point the shore (cliff) will retreat in a time period of 20 to 50 years or 'medium term'. At which point it could start encroaching on Bourne Leisure's land.

Given those timescales we would not normally discuss detailed roll back plans with potentially affected landowners at this stage. However when the time comes Natural England will, as stated in the Overview, take into account "any views expressed by people with a relevant interest in affected land".

For the purposes of coastal access establishment and maintenance, the term 'relevant interest' legally includes those who are 'in lawful occupation of the land' (see the marine and coastal access at 2009 section 297(4)).

At present the proposed route is seaward of Bourne Leisure's land holding. If the path were required to roll back onto their land holding at any time, we will consult with them about the new location of the route as the landowner and 'relevant interest'.

We would therefore not propose to amend the wording on page 27 of the Overview as suggested.

Relevant appended documents (See section 5):

5A: MCA/Overview/R/1/BBS0552 NE map.

Length 1

Full Representations

Representation number:

MCA/BBS1/R/2/BBS0741

Organisation/ person making representation:

Northumberland Joint LAF/ [REDACTED]

Route section(s) specific to this representation:

BBS-1-S033 to S053, and S058-S063

Other reports within stretch to which this representation also relates:

N/A

Representation in full *Insert the representation here in full. Do not summarise.*

The Northumberland Joint Local Access Forum's (JLAF) representation relates to seasonal restrictions that will exclude access from trail/ route. We have concerns about how these seasonal variations will be managed without a proliferation of signage. JLAF members visited the area in October 2019 and would suggest use of an all year round sign saying when route can be used. A balancing message (i.e. balancing access with nature conservation) should be included in appropriate signage and communicated via wider public channels. The general consensus after walking along sand dunes were a corridor with information at each end to guide people safely through the sand dunes but still allowing a sense of adventure, with alternatives e.g. walk along beach if tide is well out and safe to do so. Also, to manage seasonal variations of routes and how to advise people they can't access certain areas without lots of signs and using positive language – JLAF members suggest all-year-round sign saying when you can use route rather than when you can't use route (e.g. seasonal diversion at Budle Bay – only accessible July and August) avoiding 'forest of signs' but retaining 'balancing message'; also utilising wider public communication channels including leaflets as well as social media. Thank you.

Natural England's comments

Natural England welcome this representation alongside the comments of the visit to Waren Mill (Bamburgh to the Scottish Border – report 1) and St Aidan's Dunes (Amble to Bamburgh – report 4) of October 2019 and are developing our approach to signage with Northumberland County Council (NCC) and the Northumberland Coast AONB as well as other local partners.

From an early stage, Natural England have worked closely with key partners and stakeholders in designing the BBS stretch. This liaison highlighted the need for clear interpretation signage at key points of public use. We have set up a working group to help us identify where this signage should be located and also to input on its content and design. The group includes members of NE's ECP North East Hub Team, the Senior Reserve Manager of Lindisfarne NNR, the Northumberland Coast AONB and Northumberland County Council. A number of these people are active members of the JLAF, so will be able to provide a vital link between the two groups.

We have always acknowledged that good, well placed interpretation is key to making the route work in this sensitive area.

Representation number:

MCA/BBS1/R/3/BBS0021

Organisation/ person making representation:

RSPB / [REDACTED]

Route section(s) specific to this representation:

Full route and alternative route

Other reports within stretch to which this representation also relates:

N/A

Representation in full *Insert the representation here in full. Do not summarise.*

We wish to make representations concerning the clarity of access management measures to be provided in the Budle Bay, Ross Sands and Fenham Flats area to allow for appropriate use of the *permanent* route and the *alternative* route at the appropriate time of year. We appreciate that measures are being taken to limit the impact of disturbance on the European site features and functionally linked land and we support the use of the alternative route. However, for this to work effectively and be Habitats Regulations compliant, the associated access management measures need to be as robust as possible.

The general area affected by the alternative route is of prime importance for overwintering water birds (and little tern, see specific comments below). The closure of the permanent route for 10 months of the year will mean disturbance to wintering birds is limited at the most critical time. However, because the permanent route follows the route of the coastline and will be marked on Ordnance Survey maps as a permanent route, it is critical that the access management infrastructure and any barriers are as effective as possible. Access management solutions are listed in the documentation, but we urge Natural England to ensure they are as clear as possible on site and allow for no doubt as to the route to be used at a specific time of the year. We would also recommend ongoing, regular, face to face engagement with the community (Warren Mill residents and local caravan parks) as early as possible regarding the measures that will be in place to restrict access via the permanent route and ongoing engagement at the point of closure. We also suggest access via the permanent route, once closed for the season, needs monitoring through some degree of temporary wardening presence on site (particularly at the beginning of the closure season).

In addition, the area is of importance for breeding little tern and mitigation includes access management measures to limit the potential for disturbance to this species. Whilst measures to limit impacts of disturbance to little tern are well established on this stretch of coast, consideration should be made to the potential need to be flexible with closed areas in the future if/when little tern sites move or colonise new areas.

Natural England's comments

As part of the handover from NE's ECP Team to the National Trails Team, NE will set up a Trail Partnership. A key part of the partnerships role will be to steer the on-going management of the trail. Key partners like the Northumberland Coast AONB, Northumberland County Council, JLAF and Lindisfarne NNR will be invited to join the group. This partnership approach will allow us to manage the route so it is able to respond and adapt to address issues that may arise once opened. It is not within the scope of the ECP proposals and establishment phase to commit future budget to 'wardens'. The trail partnership may wish to support this as and when the partnership is formed.

Natural England have worked closely with key partners and stakeholders in designing the BBS stretch. This liaison highlighted the need to for clear interpretation signage at key points of public use. We have set up a working group to help us identify where this signage should be located and also to input on its content and design. The group includes members of the NE's ECP North East Hub Team, the Senior Reserve Manager of the Lindisfarne NNR, the Northumberland Coast AONB and Northumberland County Council.

The ECP has funded a series of people counters to monitor the impact and use of the routes, and these monitors will look at all seasons of use, thus measuring the effectiveness of the closures. Local engagement is important as it is presently and the NNR will continue its engagement strategy with local residents, including the ECP once opened.

Representation number:

MCA/BBS1/R/4/BBS0459

Organisation/ person making representation:

[REDACTED]

Route section(s) specific to this representation:

BBS-1-S039 to S050

Other reports within stretch to which this representation also relates:

N/A

Representation in full *Insert the representation here in full. Do not summarise.*

To clarify or seek clarification on a number of queries arising from the current proposals for the England Coast Path, as it relates to Ross, as published in your Overview document: *Bamburgh to The Scottish Border* and *BBS1: Bamburgh Castle Golf Course Club House to Holy Island Causeway*.

Also to make various points which should assist in the successful establishment and management of The Path and help to strike the desired fair balance between the interests of the using public and the owners and farmers of the land concerned, not least in seeking to minimise danger to the public (principally from livestock), to avoid conflict between users of The Path and farming operations, and to try to prevent the landowner and farming occupiers from being saddled with undue additional burdens and liabilities.

Enclosures - Letter dated 10th March 2020 to North East Coastal Access Team
5 no. annotated plans: Map E and Maps BBS 1d, 1e, 1f and 1g

Letter of 10th March –

Dear Sirs,

England Coast Path: Bamburgh to The Scottish Border

Consultation Representation Response

I write on behalf of [REDACTED] who, together, own and farm the property known as [REDACTED].

I write by way of clarification on a number of queries arising from the current proposals for the England Coast Path, as it relates to Ross, as published in your Overview document *Bamburgh to The Scottish Border* and *BBS1: Bamburgh Castle Golf Course Club House to Holy Island Causeway*.

I wish to make the following points on behalf of the [REDACTED], which should assist in the successful establishment and management of The Path and help to strike the desired fair balance between the interests of the using public and the owners and farmers of the land concerned.

General Observations and Comments

1) **Base Mapping information.** We note that the base mapping used to chart the route of the path is, in a number of instances, not up-to-date. We urge Natural England to use the most up-to-date data sets available from all sources, notably the Rural Land Register produced by the Rural Payments Agency because this shows the most current alignment of fences and other boundary features. In particular, the

discrepancies are most obvious at Ross in relation to stretches BBS-1-S046 and S047, (where The Path passes through Parcel 6092).

2) **Danger from Livestock.** Great care will need to be taken in establishing and managing the path, to ensure that disturbance to livestock is minimised and that the safety of the public is assured as far as possible. There have already been past incidences at Ross of cows injuring walkers and we are very anxious that the establishment of The Path does not increase the risks in this regard.

3) **Mapping of The Old Law.** We note from the Overview document (page 30 – rows 2 and 3) that the fenced area known as the Old Law is to be subject to public access exclusions all year round. However, we feel that this should be more clearly shown on the relevant mapping. The exclusion marked on the overview map (Map E on page 32), is shown as being excluded for public safety purposes (danger from livestock), which is stated as being during the period 1st September to 31st March. However, the fact that the area is also to be excluded for the purposes of nature conservation (sensitive wildlife) from 1st April to 31st August each year is not made clear.

.../Page 2

Consequently, the relevant wash colour should extend over the entirety of the Old Law on Map E. Furthermore, the fact that exclusions will be year-round on Old Law should be made clear on the detailed mapping. At present, the full extent of the Old Law is not even shown on the detailed mapping at all.

4) **Standard of fencing.** Good quality materials and workmanship will be vital, when new fencing is to be erected. We urge Natural England to allow [REDACTED] to nominate a panel of local fencing contractors, who have experience of working in the unusual ground conditions pertaining here at Ross, so that Natural England can seek the best tender from a number of local contractors who can have experience of this location and can be relied upon to carry out fencing of a good standard.

We also request that the [REDACTED] be consulted over the exact specification of fencing for each stretch, so that they can help ensure that the most appropriate specification is chosen in each location according to the desired purpose and site conditions.

5) **Signage.** Good signage and interpretation materials will be key to the successful operation of the Coast Path, once it is established. We would urge that there is sufficient, ample signage, although this must be sympathetic in style to the very special location.

6) **Naming of The Alternative Route.** We note that, for much of the year, the route will run inland according to the route identified on Map E in the Overview document (page 32). We recommend that a different term to “alternative” be used. “Alternative” implies that the inland route is an optional variation to the coastal route. This is not the case: there are very compelling wildlife and nature conservation reasons why the route is being directed inland for the majority of the year and we recommend that a clearer and less ambiguous term is used to describe the alternative route.

Specific Queries (with reference to annotated plans attached)

Map BBS1d-Ross Low Sluice to Ross Back Sands

Stretch BBS-1-S039

a) Care will need to be taken where the path crosses the Ross Low flood-control sluice (The Sea Gate). The workings of the flood control and eel gates might well be an invitation to curious people, particularly youngsters, so careful thought should be given to how danger can be minimised.

b) Two field gates to be installed on top of “Sea Wall” (not kissing gates).

c) New field gate to be installed where Sea Wall transects fenceline 9308/1713.

d) Throughout stretch: the fencing specification must be as follows: (using existing fencing where already *in situ*: erecting new where necessary): i) post, pignet and top line wire fence on top of Sea Wall, on seaward side and ii) guard fence on north (landward) side at foot of bank, being post, one intermediate plain wire and one top barb, so as to allow sheep, but not cattle, to pass underneath.

Stretch BBS-1-S040

a) Suitable signage to be erected with map, explaining that the route passes onto the foreshore from this point eastwards.

.../Page 3

b) Proposed steps downward onto foreshore should be located where shown, approximately 655m south west of where indicated on plan.

Stretches BBS-1-S042 and BBS-1-S043

a) These stretches could form a straight line – there is no need for a “kink”.

b) Erect signage indicating danger of climbing over fence into fields, and making it clear that there is no public right of access through the gate.

Stretch BBS-1-S044

a) There must be suitable signage explaining about nature conservation and the fact that the path must follow the route shown and that the dune area inland is subject to an exclusion throughout the year, on the grounds of nature conservation matters.

Map BBS1e- Ross Back Sands

Stretch BBS-1-S045

a) There must be suitable signage explaining about nature conservation and the fact that the path must follow the route shown and that the dune area inland is subject to an exclusion throughout the year, on the grounds of nature conservation matters.

b) Suitable signage should be erected where the existing west-east public footpath meets the restricted dune area, making clear that walkers must adhere to the path east of this point until they have crossed the most seaward fence and have then met the route of the ECP, and that the pink-shaded dune area is otherwise excluded from access for nature conservation purposes.

Map BBS1f – Ross Back Sands to Cockly Knowes

Stretch BBS-1-S046

a) As per General Note 1 on Page 1 of this letter, please show existing fence line on map.

b) Marker posts must be installed, as agreed with [REDACTED] on site in September 2018, defining the actual route through this section.

Stretch BBS-1-S047

a) Continue clear definition of route with marker posts if necessary.

Stretch BBS-1-S048

a) Show, on mapping and with signage, the Old Law excluded

b) Sign to make clear that the route of the path is at the base of the bank.

Map BBS1g – Cockly Knowes to Cathangings Letch

Stretch BBS-1-S049 .../Page 4

a) Make clear that the route on this section is on the seaward side of the field boundary fence.

Stretch BBS-1-1S050

a) Make clear that the route on this section is on the seaward side of the field boundary fence.

I enclose annotated plans for clarity, in order to illustrate the points made.

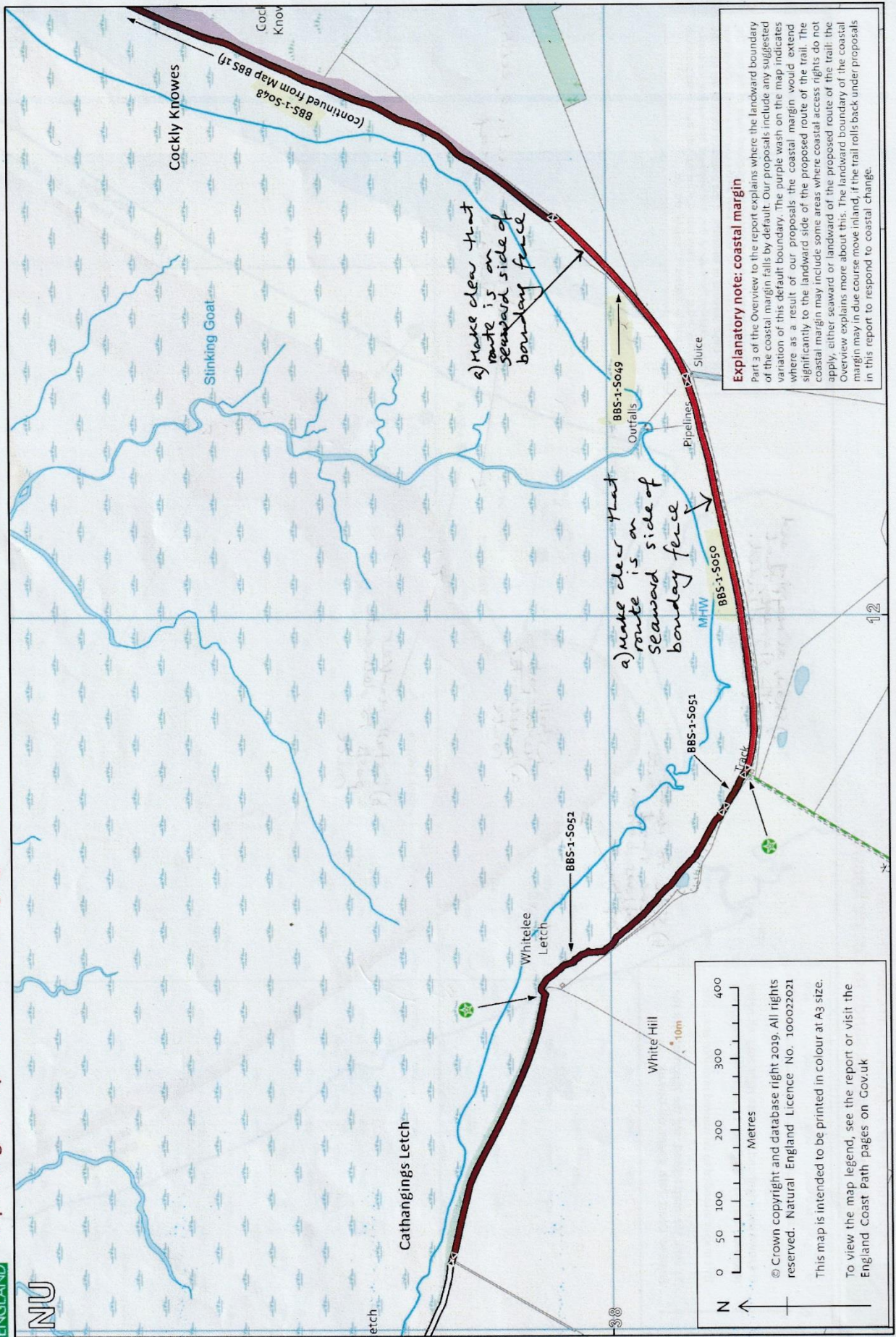
I trust that you will give these points your careful consideration.

Yours faithfully

[REDACTED]

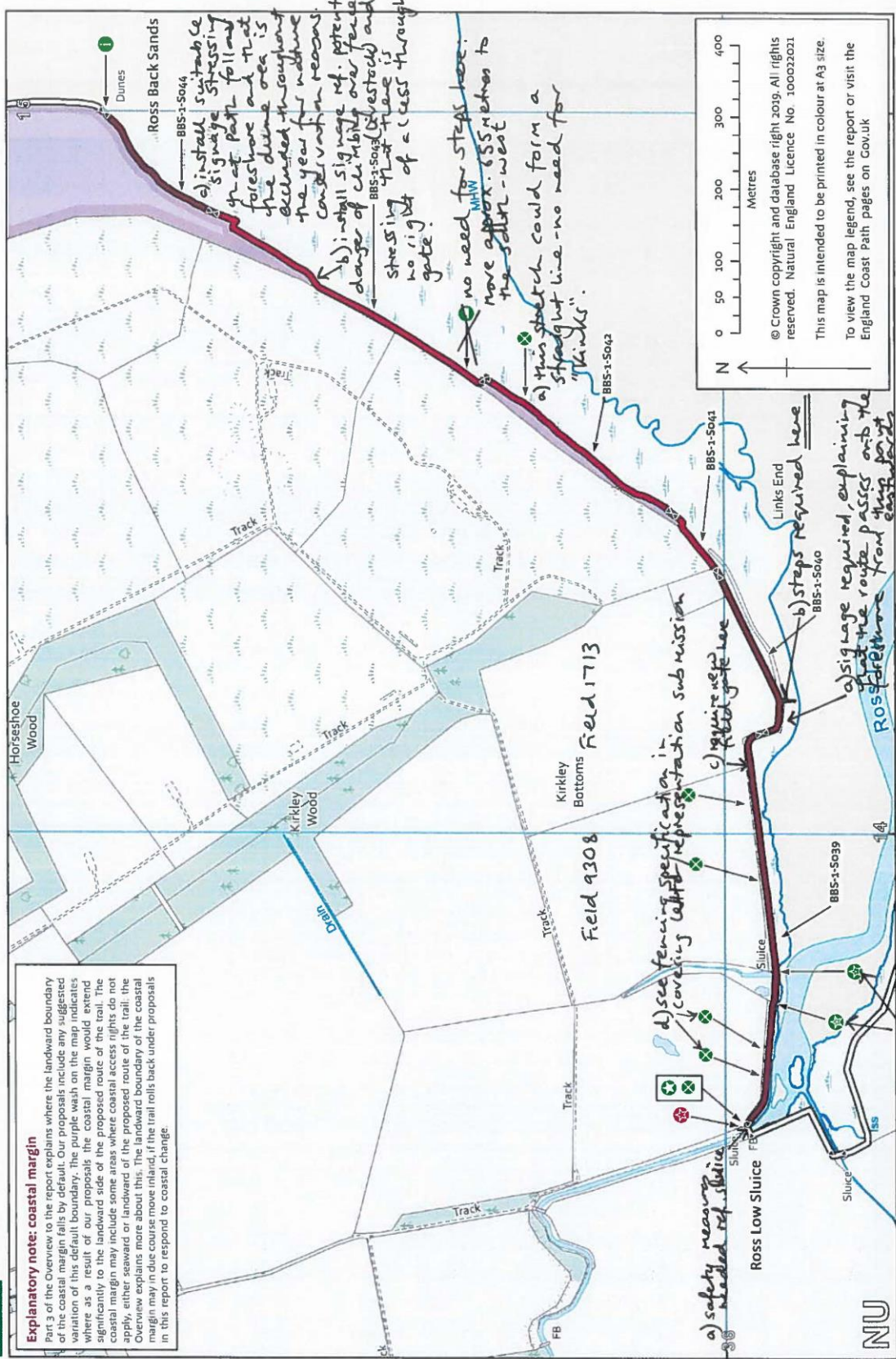
Director

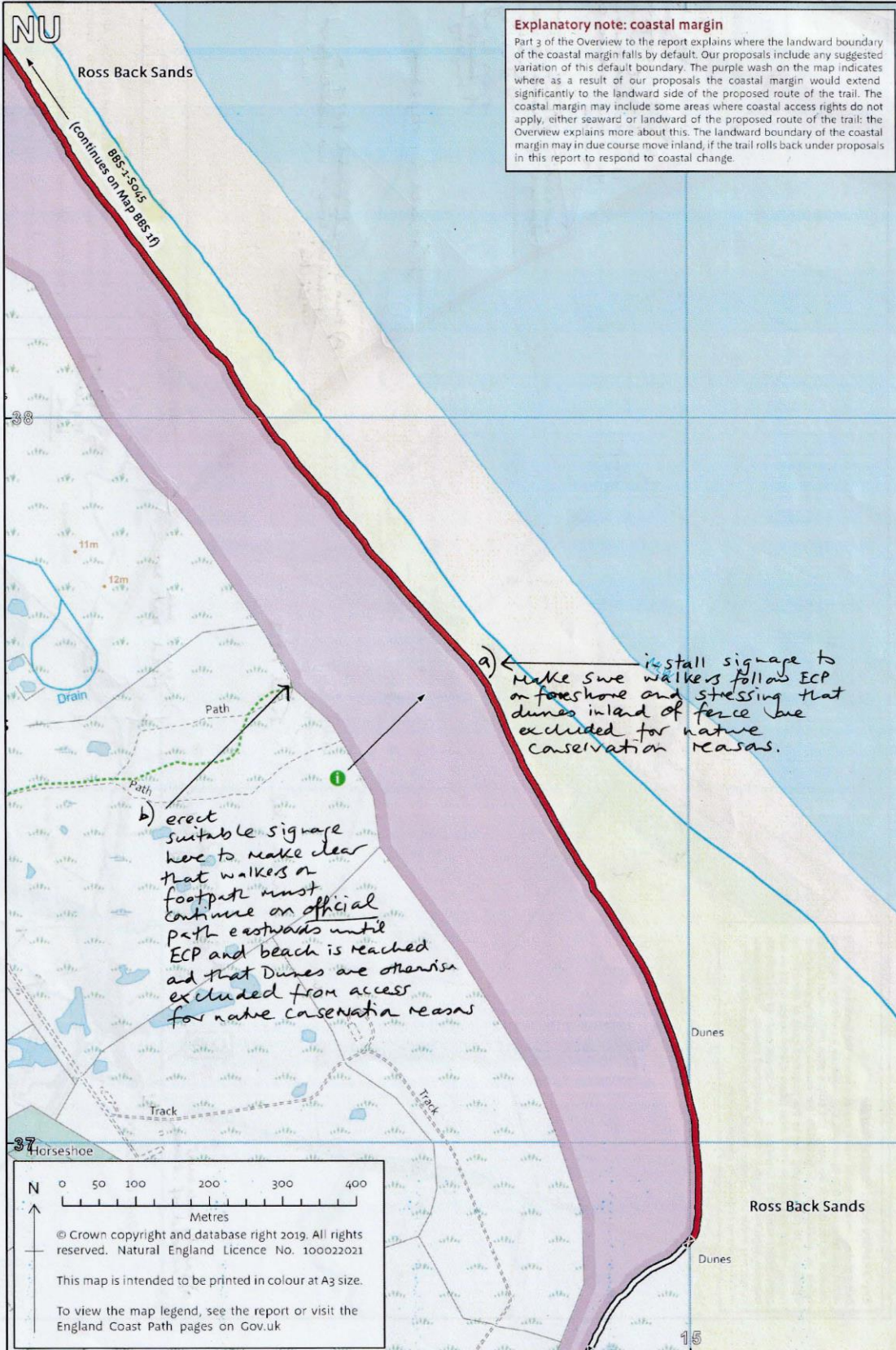
Enc Annotated plans





Map BBS 1d Ross Low Sluice to Ross Back Sands

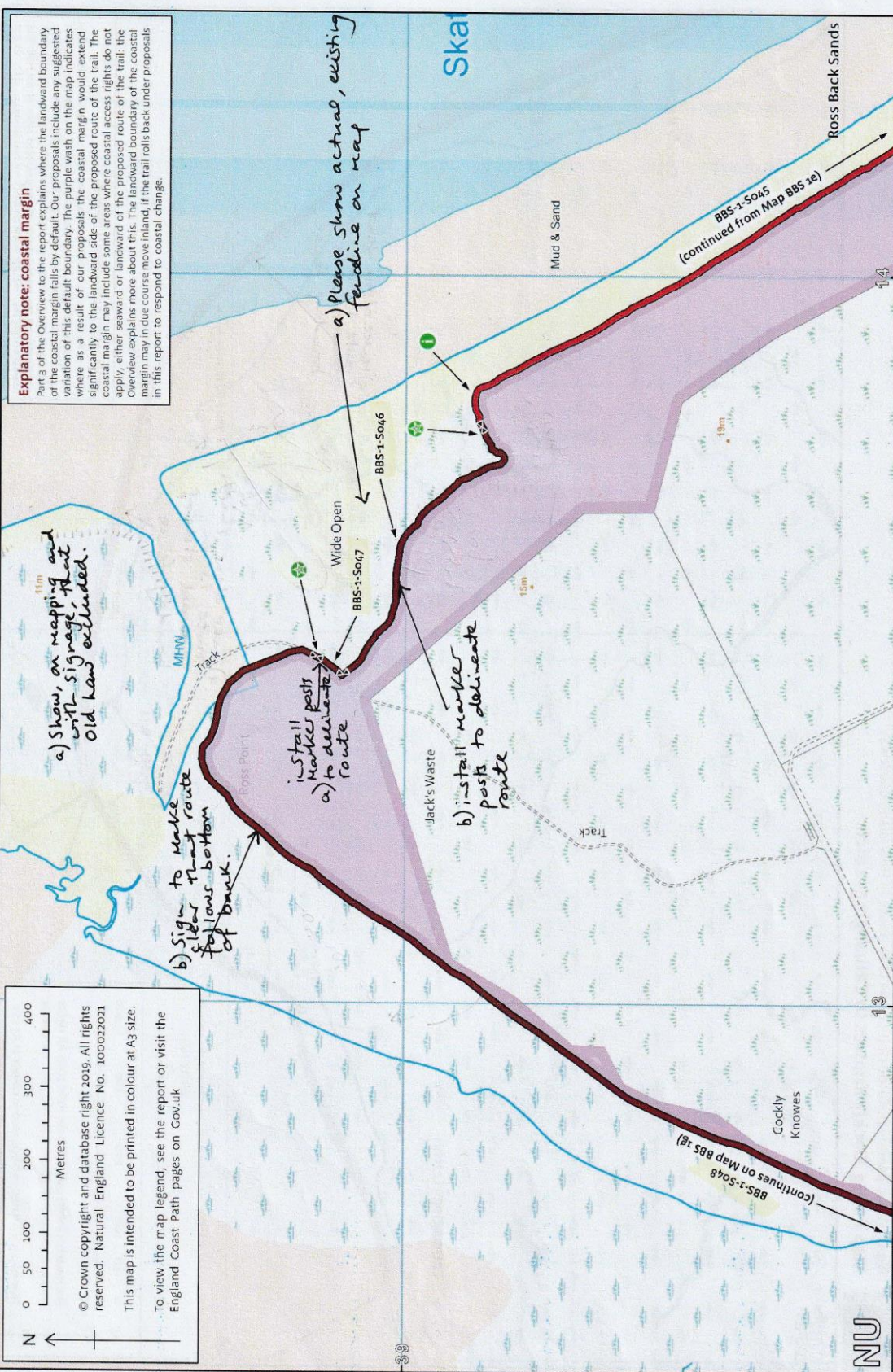






N
 0 50 100 200 300 400
 Metres

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 This map is intended to be printed in colour at A3 size.
 To view the map legend, see the report or visit the England Coast Path pages on Gov.uk



Explanatory note: coastal margin
 Part 3 of the Overview to the report explains where the landward boundary of the coastal margin falls by default. Our proposals include any suggested variation of this default boundary. The purple wash on the map indicates where as a result of our proposals the coastal margin would extend significantly to the landward side of the proposed route of the trail. The coastal margin may include some areas where coastal access rights do not apply, either seaward or landward of the proposed route of the trail: the Overview explains more about this. The landward boundary of the coastal margin may in due course move inland, if the trail rolls back under proposals in this report to respond to coastal change.

a) Show, on mapping and with signage, that old haw excluded.






b) Sign to make route follow bottom of bank.

install marker posts a) to delineate route

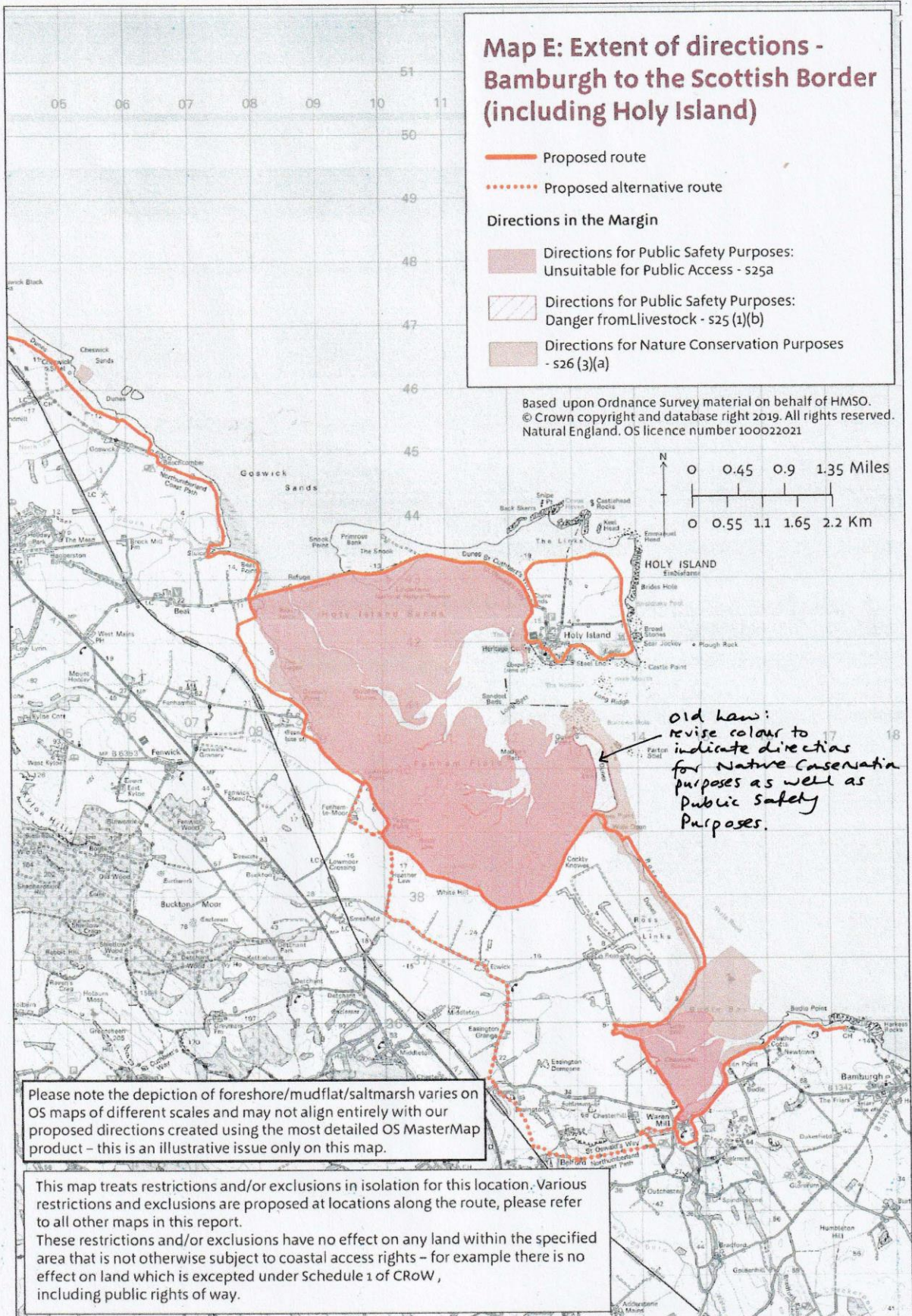
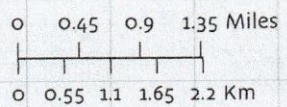
b) install marker posts to delineate route

a) Please show actual, existing fence line on map

Map E: Extent of directions - Bamburgh to the Scottish Border (including Holy Island)

-  Proposed route
 -  Proposed alternative route
- Directions in the Margin**
-  Directions for Public Safety Purposes:
Unsuitable for Public Access - s25a
 -  Directions for Public Safety Purposes:
Danger from Livestock - s25 (1)(b)
 -  Directions for Nature Conservation Purposes
- s26 (3)(a)

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*old law:
revise colour to
indicate directions
for Nature Conservatⁿ
purposes as well as
Public Safety
Purposes.*

Please note the depiction of foreshore/mudflat/saltmarsh varies on OS maps of different scales and may not align entirely with our proposed directions created using the most detailed OS MasterMap product – this is an illustrative issue only on this map.

This map treats restrictions and/or exclusions in isolation for this location. Various restrictions and exclusions are proposed at locations along the route, please refer to all other maps in this report. These restrictions and/or exclusions have no effect on any land within the specified area that is not otherwise subject to coastal access rights – for example there is no effect on land which is excepted under Schedule 1 of CRow, including public rights of way.

Natural England's comments

We will deal with each of the points in the order they are raised within the representation:

1, Base mapping – Natural England use Ordnance and Survey base mapping data sets for the production of report maps and we are unable to overlay these with other data sets when presenting work to the public. We have been able to use such data sets for internal maps that we have shown to [REDACTED] and his agent, but unfortunately these cannot be used on public facing work.

2, Danger from livestock – We acknowledge the landowners concerns and we have taken their views into consideration when arriving at the proposed route. This route runs seaward of farm land used for livestock grazing and new fencing is being supplied along specific field boundaries to achieve a robust boundary.

3, Mapping of Old Law – All directions to restrict or exclude access are listed on the [Open Access Website](#) It will also be covered on the ground through interpretation at key points. The area known as Old Law has a direction on it for the period of 1st September to 31st March only. Outside this time of year the area around Old Law is restricted for a nature conservation reason which isolates Old Law from being accessible. Therefore effectively the area known as Old Law is restricted all year round.

4, Standard of fencing – We work with Northumberland County Council to establish the route and this fencing work will be done as part of that. The landowner and agent are aware of this and have been made aware of the ECPEF grant fund.

5, Signage – We will ensure that both route and interpretation signage are put in place. This is a highly sensitive area and so we will want to make sure the public are well informed about the route and the various restrictions that apply to it.

6, Naming of the alternative route – The term 'alternative' is used in the report to reflect the approved scheme and legislation that enable the ECP. On the ground we have the flexibility to use more pragmatic and suitable language in our interpretation and signage.

Specific queries (with reference to annotated plans attached)

Natural England will work closely with the landowner and NCC to ensure that where possible, the needs of the landowner are met, whilst maintaining the necessary standards associated with the establishment of a national trail.

This consultation may result in changing the nature and location of some of the infrastructure specified in the report and on the maps. For example, the location of the steps at section BBS-1-S040, and the type of gate at section BBS-1-S039 are likely to change. We will also ensure that signage on the trail conveys the right information and serves the needs of the landowner and walker alike.

With regard to the sections BBS-1-S042 and S043, there does appear to be a mapping error which Natural England will address.

Representation number:

MCA/BBS1/R/6/BBS0532

Organisation/ person making representation:

Historic England / [REDACTED]

Route section(s) specific to this representation:

BBS-1-S069 to BBS-1-S073

Other reports within stretch to which this representation also relates:

N/A

Representation in full *Insert the representation here in full. Do not summarise.*

I confirm that Historic England are pleased to see that the route across the scheduled monument known as “Monastic Grange at Fenham” (National Heritage List for England HA 1015631) as shown on map “BBS 1j Common Slap to The Cages” is as we had previously discussed with Natural England. Any additional fencing or gates which may be required by fixing into the ground will need Scheduled Monument Consent from the Secretary of State at DCMS and can be applied for through the local office of Historic England in Newcastle.

Natural England’s comments

We have worked closely with the landowner to achieve the proposed route that crosses the scheduled monument. He joined us on site when we met [REDACTED] of Historic England (HE) and he explained what his plans were as regards fencing within the field. These plans will require a kissing gate and associated ground works to be erected (BBS-1-S069) our records show this as outside of the designated area of the Monastic Grange at Fenham, We will instruct NCC to consult with HE before these works take place.

Representation number:

MCA/BBS1/R/7/BBS0554

Organisation/ person making representation:

The Ramblers / [REDACTED]

Route section(s) specific to this representation:

All sections

Other reports within stretch to which this representation also relates:

N/A

Representation in full

We support Natural England’s (NE’s) proposals from BBS-1-S001 to BBS-1-S034.

Between BBS-1-S035 and BBS-1-S053, NE propose that the route would be open for only 2 months of the year. We fully support appropriate measures to protect vulnerable overwintering birds and note the findings of NE’s Habitat Regulations Assessment that this is an important location for a number of species. However, the inland alternative route provided for the remainder of the year (BBS-1-A001 to BBS-1-A016) takes the coast path considerably inland and very close to the east coast mainline railway track. We do not consider that these proposals provide the most convenient or desirable option in this location.

We further note that public access to the dunes is already enjoyed by many people and that Ross beach is promoted for year round public use, with a restriction on dogs between 1st May - 30th July.

We would prefer to see the routes shown below adopted for the coast path. Our proposed coastal route makes use of existing tracks across the Ross Back peninsular and would bring the coast path route further away from the sensitive areas of Black Law, Wide Open, Guile Point and Long Ridge. We hope, therefore that this route could be kept open all year. However, should an inland alternative route be necessary for part of the year, our proposal would predominantly make use of existing tracks and public roads, avoiding disturbance to any grazing geese on fields at Ross, Elwick and Easington.



SECTION 08 - BAMBURGH - FENHAM Le MOOR

We support Natural England's (NE's) proposals from BBS-1-S035 to BBS-1-S077.

Natural England's comments

We spent many months discussing various route options within the specified area of the representation with landowners and partner organisations. The routes suggested in the representation were considered, but were firmly rejected by either the landowners, partner organisations or both.

Much of the permanent route suggested follows the coast along Budle Bay, between Waren Mill and Ross Low. This is a highly sensitive area for over wintering birds and so wouldn't be acceptable under nature conservation grounds. If it is agreed that for this reason the suggested route is not viable along this section, this leaves very little option for another route, other than the alternative route that is proposed within the report.

We acknowledge that the alternative route proposed within the report does run in land, but in elevated sections it affords excellent views of the coast and surrounding countryside. It takes

into account the land management requirements of the affected landowners and accommodates nature conservation requirements in this highly sensitive area.

We welcome the suggestions from the Ramblers, and these were considered by NE. They were, however discounted for several reasons. NE felt the inland route over Ross Links would create an unfair balance on private interests. It would also take ECP trail users away from Ross Back Sands which is an extremely picturesque beach with views of both Bamburgh and Lindisfarne castles. Both routes proposed here in this representation also continue to impact upon inland grazing geese in the Autumn, Winter months.

Representation number:

MCA/BBS1/R/8/BBS0742

Organisation/ person making representation:

Berwick Ramblers / [REDACTED]

Route section(s) specific to this representation:

All sections

Other reports within stretch to which this representation also relates:

N/A

Representation in full *Insert the representation here in full. Do not summarise.*

BBS1 Bamburgh Castle Golf Course Club House to Holy Island Causeway (Maps BBS 1a to BBS 1k and BBS A1 to BBS A4).

Area around Budle Bay.

The members of Berwick Ramblers are pleased in general with the proposals for the England Coast path from Bamburgh to the Scottish border. Whilst delighted that the proposed route shows a move away from the current route inland around Belford towards the actual coast there are concerns over the alternative winter path. The view is that a 10 month closure of the seaward path between Budle Bay and Lowmoor Point is excessive. We would therefore ask if a longer period of access to this path be considered. Belford however should be well signposted at the point where the new path will diverge from the current one into the village. It has facilities walkers appreciate either for a short break or overnight stay.

Natural England's comments

In developing out proposals we are bound by the Habitats Regulations Assessment (HRA) which accompanies these proposals. We have worked extensively with partners to ensure the proposed main and alternative routes do not adversely affect overwintering and passage birds (features) that are listed in the Northumbria Coast and Northumberland Marine Special Protection Areas, Northumbria Coast Ramsar site and Berwickshire & North Northumberland Coast and North Northumberland Dunes Special Areas of Conservation. We are satisfied that the main route cannot open for a longer timescale than the two months set out in the report. It should be noted that the closure will be made under the CRoW Act which requires NE to review the arrangement not less than once in every 5 year period.

The route will be well sign posted and we are working closely with Northumberland County Council to see that adequate signs are in place.

Other Representations

Representation ID:

MCA/BBS1/R/1/BBS0629

Organisation/ person making representation:

[REDACTED]

Name of site:

Between Budle Bay and Lowmoor Point (via Ross Sands)

Report map reference:

BBS 1b to 1i

Route sections on or adjacent to the land:

BBS-1-S033 to BBS-1-S053

BBS-1-S058 to BBS-1-S063

Other reports within stretch to which this representation also relates

Summary of representation:

The representation concerns the proposed 10 month closure of the trail, with an alternative route, due to disturbance of SPA/SSSI bird features which ‘seems very restrictive and doesn’t achieve a fair balance between the needs of the walkers and wildlife’

An RSPB report titled ‘A Million Voices for Nature’ is referenced as guidance on the use of bird data in marine planning. The representation urges reconsideration of the time period that is considered necessary for the alternative route.

Natural England’s comment:

In developing our proposals we are bound by the Habitats Regulations Assessment (HRA) which accompanies these proposals. We have worked extensively with partners to ensure the proposed main and alternative routes do not adversely affect overwintering and passage birds (features) that are listed in the Northumbria Coast and Northumberland Marine Special Protection Areas, Northumbria Coast Ramsar site and Berwickshire & North Northumberland Coast and North Northumberland Dunes Special Areas of Conservation. We are satisfied that the main route cannot open for a longer timescale than the two months set out in the report. It should be noted that the closure will be made under the CRoW Act which requires NE to review the arrangement not less than once in every 5 year period.

The route will be well sign posted and we are working closely with Northumberland County Council to see that adequate signs are in place.

Representation ID:

MCA/BBS1/R/5/BBS0008

Organisation/ person making representation:
Disabled Ramblers / [REDACTED]

Name of site:
Report BBS 1 Bamburgh Castle Golf Club to Holy Island Causeway

Report map reference:

Report BBS 1: Bamburgh Castle Golf Course Club House to Holy Island Causeway

- Map BBS 1a Bamburgh Castle Golf Course Club House to Kiln Point
- Map BBS 1b Kiln Point to Waren Mill
- Map BBS 1c Waren Mill to Ross Low Sluice
- Map BBS 1d Ross Low Sluice to Ross Back Sands
- Map BBS 1e Ross Back Sands
- Map BBS 1f Ross Back Sands to Cockly Knowes
- Map BBS 1g Cockly Knowes to Cathangings Letch
- Map BBS 1h Cathangings Letch to Foulwork Burn
- Map BBS 1i Foulwork Burn to Common Slap (including Fenham-Le-Moor alternative route)
- Map BBS 1j Common Slap to The Cages
- Map BBS 1k The Cages to Holy Island Causeway
- Map BBS A1 Cove Cottage, Waren Mill to Track from Station Cottages
- Map BBS A2 Track from Station Cottages to Road to Easington Grange
- Map BBS A3 Easington Grange to Elwick
- Map BBS A4 Road to Elwick to Bridleway Southwest of Heather Law

Route sections on or adjacent to the land:

1. Report BBS 1 All route sections generally.
2. Map 1a, route section BBS-1-S011

Other reports within stretch to which this representation also relates

All BBS reports

Summary of representation:

The Disabled Ramblers point out that at Paragraph 1.2.9 of the report states ‘there are few artificial barriers to accessibility on the proposed route’

The Disabled ramblers then list several locations where access furniture is not suitable for ‘all-terrain mobility vehicle’s and push chairs’ and remind Natural England that users of these mobility aids have the same legitimate rights as walkers to subject to the natural terrain.

Specific requests are made for NE to

1. Work with owners for existing structures to ensure the structures are more accessible
2. Follow BS 2018 ‘Gaps gates & Stiles’
3. Comply with the Equality Act 2010
4. Comply with the CRoW Act 2000
5. Follow advice given in the attached not – see below

Natural England’s comment:

We have worked to the guidelines set out in the Coastal Access Scheme at paragraphs 4.3.8 to 4.3.11.

We are aware of British Standard BS5709: 2018 Gaps Gates and Stiles. In designing our proposed route we have tried to make the route available to as wide a group of users as is reasonably possible. We have avoided creating any unnecessary new barriers to access by choosing infrastructure that will have the least restrictive impact. There are no stiles proposed on this route. Gaps have been used where appropriate however in this agricultural landscape livestock grazing is a common land use. This limits the use of gaps where and when livestock are present. Pedestrian gates are favoured above kissing gates on most of the route and we will ensure the fastenings and latches are suitable simple operation.

We work with Northumberland County Council to establish the trail, so we will discuss accessibility with them when we plan our schedule of works. In particular and following contact between NE and the Disabled Ramblers;

- Change of Bristol gates to other pedestrian gates.
- Note future aspirations to make EA combined sluice gate and pedestrian bridge structures more accessible in any future maintenance/replacement plans.

Relevant appended documents (see Section 5):

5B: MCA/BBS1/R/5/BBS0008 Disabled Ramblers notes on infrastructure

Length 2

Full Representations

Representation number:

MCA/BBS2/R/2/BBS0554

Organisation/ person making representation:

The Ramblers / [REDACTED]

Route section(s) specific to this representation:

All sections

Other reports within stretch to which this representation also relates:

N/A

Representation in full *Insert the representation here in full. Do not summarise.*

The Ramblers fully supports Natural England's proposals for the England Coast Path between Holy Island Causeway and Beal.

Natural England's comments

Natural England welcome the positive comments from the Ramblers about our proposed route here.

Other Representations

Representation ID:

MCA/BBS2/R/1/BBS0008

Organisation/ person making representation:

Disabled Ramblers / [REDACTED]

Name of site:

Report BBS 2: All route sections generally.

Report map reference:

Maps 2a – 2f

Route sections on or adjacent to the land:

All sections referred to.

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

Paragraph 2.2.7 of the Report states:

There are few artificial barriers to accessibility on the proposed route.

Disabled Ramblers has concerns with this statement as there are there are known instances where access furniture along the trail is not of a suitable standard for those who use all-terrain mobility vehicles and push chairs.

The Disabled Ramblers is concerned that Natural England has not recognised that there is a significant and steadily increasing number of people with reduced mobility who use all-terrain mobility scooters and other mobility vehicles to enjoy routes on rugged terrain in the countryside, including uneven grass, bare soil or rocky paths, foreshore areas and some sea walls and beaches. Slopes of 1:4, obstacles 6” high, water to a depth of 8” are all challenges that users of all-terrain mobility scooters are used to managing.

These people have the same legitimate rights to access that walkers do, so Natural England should ensure that, unless the natural terrain itself prevents access, any existing or new infrastructure along the Coast Path does not present a barrier to their ability to progress along the Coast Path.

The Disabled Ramblers has identified many instances where Natural England’s maps show they propose to retain structures or introduce new ones which are, or may well be, barriers to legitimate access along the Coast Path for those with limited mobility, particularly on mobility scooters.

Disabled Ramblers requests that Natural England

- address with the necessary parties involved, the issue of existing man-made structures that are a barrier to those who use mobility vehicles, and enable changes to be made to allow people who use these vehicles to enjoy the England Coast Path in this area.
- ensure that all existing and proposed new structures along the Coast Path are suitable for those who use large mobility vehicles, changing infrastructure as needed, and complying with *British Standard BS5709: 2018 Gaps Gates and Stiles*.
- comply with the Equality Act 2010 (and the Public Sector Equality Duty within this act)
- comply with the Countryside Rights of Way Act 2000

- follow the advice in the attached document *Disabled Ramblers Notes on Infrastructure* which gives general notes with regard to access for users of mobility vehicles.

Natural England's comment:

We have worked to the guidelines set out in the Coastal Access Scheme at paragraphs 4.3.8 to 4.3.11.

We are aware of British Standard BS5709: 2018 Gaps Gates and Stiles. In designing our proposed route we have tried to make the route available to as wide a group of users as is reasonably possible. We have avoided creating any unnecessary new barriers to access by choosing infrastructure that will have the least restrictive impact. There are no stiles proposed on this route. Gaps have been used where appropriate however in this agricultural landscape livestock grazing is a common land use. This limits the use of gaps where and when livestock are present. Pedestrian gates are favoured above kissing gates on most of the route and we will ensure the fastenings and latches are suitable simple operation.

We work with Northumberland County Council to establish the trail, so we will discuss accessibility with them when we plan our schedule of works.

Relevant appended documents (see Section 5):

5B: MCA/BBS2/R/1/BBS0008 Disabled Ramblers notes on infrastructure

Length 4

Full Representations

Representation number:

MCA/BBS4/R/2/BBS0554

Organisation/ person making representation:

The Ramblers / [REDACTED]

Route section(s) specific to this representation:

All sections

Other reports within stretch to which this representation also relates:

N/A

Representation in full

The Ramblers fully supports Natural England's proposals for the England Coast Path between Berwick upon-Tweed and Marshall Meadows.

Natural England's comments

Natural England welcome the positive comments from the Ramblers about our proposed route here.

Other Representations

Representation ID:

MCA/BBS4/R/1/BBS0008

Organisation/ person making representation:

Disabled Ramblers / [REDACTED]

Name of site:

Report BBS 4: Berwick-upon-Tweed to Marshall Meadows

Report map reference:

BBS 4a – 4d

Route sections on or adjacent to the land:

N/A

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

Paragraph 4.2.7 of the Report states:

There are few artificial barriers to accessibility on the proposed route.

Disabled Ramblers has concerns with this statement as there are there are known instances where access furniture along the trail is not of a suitable standard for those who use all-terrain mobility vehicles and push chairs.

The Disabled Ramblers is concerned that Natural England has not recognised that there is a significant and steadily increasing number of people with reduced mobility who use all-terrain mobility scooters and other mobility vehicles to enjoy routes on rugged terrain in the countryside, including uneven grass, bare soil or rocky paths, foreshore areas and some sea walls and beaches. Slopes of 1:4, obstacles 6” high, water to a depth of 8” are all challenges that users of all-terrain mobility scooters are used to managing.

These people have the same legitimate rights to access that walkers do, so Natural England should ensure that, unless the natural terrain itself prevents access, any existing or new infrastructure along the Coast Path does not present a barrier to their ability to progress along the Coast Path.

The Disabled Ramblers has identified many instances where Natural England’s maps show they propose to retain structures or introduce new ones which are, or may well be, barriers to legitimate access along the Coast Path for those with limited mobility, particularly on mobility scooters.

Disabled Ramblers requests that Natural England

- address with the necessary parties involved, the issue of existing man-made structures that are a barrier to those who use mobility vehicles, and enable changes to be made to allow people who use these vehicles to enjoy the England Coast Path in this area.

- ensure that all existing and proposed new structures along the Coast Path are suitable for those who use large mobility vehicles, changing infrastructure as needed, and complying with *British Standard BS5709: 2018 Gaps Gates and Stiles*.
- comply with the Equality Act 2010 (and the Public Sector Equality Duty within this act)
- comply with the Countryside Rights of Way Act 2000
- follow the advice in the attached document *Disabled Ramblers Notes on Infrastructure* which gives general notes with regard to access for users of mobility vehicles.

The Disabled Ramblers consider that Natural England has not taken into consideration the significant and steadily increasing number of people with reduced mobility who use mobility scooters and other mobility vehicles as this group of people are unable to cross the River Tweed at Berwick Bridge on the proposed route.

Berwick Bridge is altogether narrow, with narrow footways on either side, both of which are too narrow for use by mobility vehicles, and it would be unsafe to use the roadway. A reasonable adjustment to the Coast Path route would be for users of mobility vehicles to cross the River Tweed at Royal Tweed Bridge, which is a little further to the north of the proposed route. There should be a signed diversion from the Royal Tweed Bridge, to meet up with the trail at BSS-4-S003. The diversion would additionally benefit those with pushchairs.

The route of the diversion for mobility vehicles should be as follows:

Leave Royal Tweed Bridge at Pudding Lane, continue along Golden Square, turn south east along Marygate, south along Hide Hill, north west into Bridge Street and west into Bridge End to meet up with the Wall walk at BSS-4-S003.

NB. This diversion is a continuation of the diversion required for **Report BBS 3: Beal to Berwick-upon-Tweed**, Map BBS 3i Spittal to Berwick-upon-Tweed. (See representation *Disabled Ramblers Representation 3, Bamburgh to Scottish Border Report 3*.)

Natural England's comment:

We have worked to the guidelines set out in the Coastal Access Scheme at paragraphs 4.3.8 to 4.3.11.

We are aware of British Standard BS5709: 2018 Gaps Gates and Stiles. In designing our proposed route we have tried to make the route available to as wide a group of users as is reasonably possible. We have avoided creating any unnecessary new barriers to access by choosing infrastructure that will have the least restrictive impact. There are no stiles proposed on this route. Gaps have been used where appropriate however in this agricultural landscape livestock grazing is a common land use. This limits the use of gaps where and when livestock are present. Pedestrian gates are favoured above kissing gates on most of the route and we will ensure the fastenings and latches are suitable simple operation.

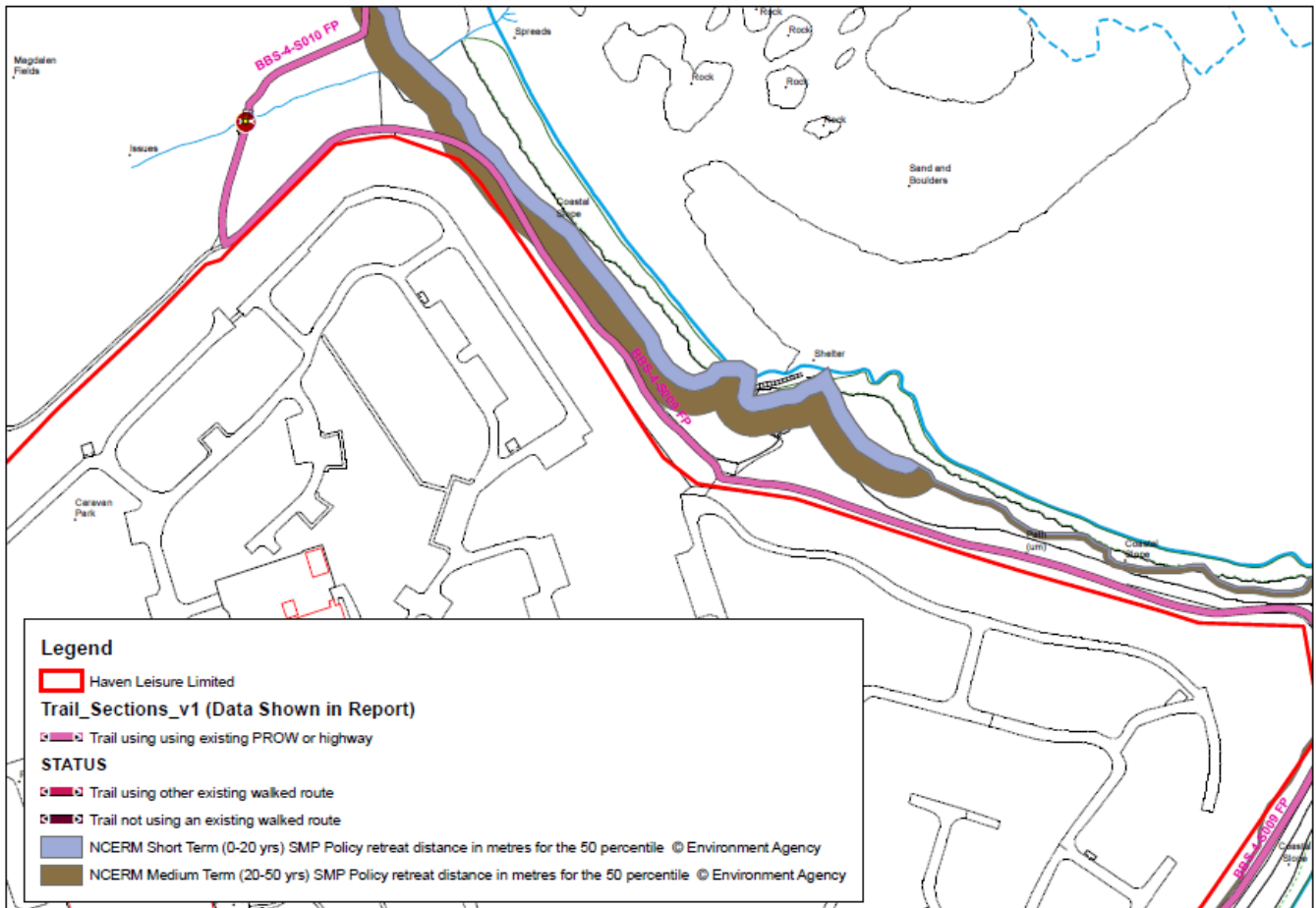
We work with Northumberland County Council to establish the trail, so we will discuss accessibility with them when we plan our schedule of works. In particular and following contact between NE and the DA, the representation makes specific mention of Berwick Bridge and the suitability of this bridge for mobility scooters and other mobility aids. In recent communications with NCC they are talking to the Highways Department (roads) to confirm if Berwick Bridge is to be pedestrianised. Currently the historic bridge is open to one-way traffic only. If pedestrianisation is not planned, NCC will explore the options to make the bridge more accessible to all users.

Relevant appended documents (see Section 5):

5B: MCA/BBS4/R/1/BBS0008 Disabled Ramblers Notes on Infrastructure

5. Supporting Documents

- 5A: MCA/Overview/R/1/BBS0552 NE map.



- 5B: MCA/BBS1/R/5/BBS0008, MCA/BBS2/R/1/BBS0008, MCA/BBS4/R/1/BBS0008 Disabled Ramblers notes on infrastructure

DISABLED RAMBLERS NOTES ON INFRASTRUCTURE

Useful figures

- **Mobility Vehicles**
- **Legal Maximum Width of Category 3 mobility vehicles: 85cm** Same width is needed all the way up to pass through any kind of barrier to allow for handlebars, armrests and other bodywork.
- **Length:** Mobility vehicles vary in length, but **173cm is a guide minimum length.**
- **Gaps** should be 1.1 minimum width on a footpath (BS5709:2018)
- **Pedestrian gates** The minimum clear width should be 1.1m (BS5709:2018)
- **Manoeuvring space** One-way opening gates need more manoeuvring space than two-way opening ones and some mobility vehicles may need a three metre diameter space.
- **The ground** before, through and after any gap or barrier must be flat otherwise the resulting tilt effectively reduces the width

Infrastructure

Infrastructure on the route of the England Coast Path should be assessed by Natural England for suitability for those with limited mobility, and particularly for those riding large or all-terrain mobility vehicles. The assumption should always be that these individuals will be alone, and will need to stay sitting on their mobility vehicle, ie they will not be accompanied by someone who could open a gate and hold it open for them. The principle of the least restrictive option should always be applied.

- **New infrastructure** New infrastructure should comply with Bristol Standard with BS 5709: 2018 Gaps, Gates and Stiles.
- **Existing infrastructure** The creation of the England Coast Path provides a perfect opportunity to improve the trail to make it as accessible as possible. Unsuitable existing infrastructure could be removed now and, where necessary, replaced with new, appropriate infrastructure in line with BS 5709: 2018 Gaps, Gates and Stiles.

Gaps

A Gap is always the preferred solution for access, and the least restrictive option (BS 5709:2018). The minimum clear width of gaps on footpaths should be 1.1metres (BS 5709:2018).

Bollards

On a footpath, these should be placed to allow a minimum gap of 1.1metres through which large mobility vehicles can pass.

Pedestrian gates A two-way, self-closing gate closing gate with trombone handle and Centrewire EASY LATCH is the easiest to use – if well maintained, and if a simple gap is unacceptable. Yellow handles and EASY LATCH allow greater visibility and assist those with impaired sight too. <https://centrewire.com/products/easy-latch-for-2-way-gate/> One-way opening gates need more manoeuvring space than two-way and some mobility vehicles may need a three metre diameter space to manoeuvre around a one-way gate. The minimum clear width of pedestrian gates should be 1.1metres (BS 5709:2018).

Field gates

Field gates (sometimes used across roads) are too large and heavy for those with limited mobility to use, so should always be paired with an alternative such as a gap, or pedestrian gate. However if this is not possible, a York 2 in 1 Gate <https://centrewire.com/products/york-2-in-1/> could be an alternative, with a self-closing, two-way opening and yellow handles and EASY LATCH.

Bristol gates

(Step-over metal gate within a larger gate.) These are a barrier to mobility vehicles, as well as to pushchairs, so should be replaced with an appropriate structure. If space is limited, and a pedestrian gate not possible, a York 2 in 1 Gate <https://centrewire.com/products/york-2-in-1/> could be an alternative, with a self-closing, two way opening, and yellow handle and EASY LATCH for the public access part of the gate.

Kissing gates

A two-way, self-closing gate is hugely preferable to a kissing gate, but in certain situations a kissing gate might be needed. Many kissing gates can be used by smaller pushchairs and small wheelchairs, but are impassable by mobility scooters and other mobility vehicles. Unless an existing kissing gate has been specifically designed for access by large mobility vehicles, it should be replaced, if possible with a suitable gate (see above). If a kissing gate really must be used, Disabled Ramblers recommend the Centrewire Woodstock Large Mobility kissing gate, fitted with a RADAR lock, which can be used by those riding mobility vehicles. NB this is the only type kissing gate that is large enough to be used by all-terrain and large mobility vehicles.

Note about RADAR locks on Kissing gates

Often mobility vehicle riders find RADAR locks difficult to use, so they should only be used if there is not a suitable alternative arrangement. Here are some of the reasons why:

- Rider cannot get off mobility vehicle to reach the lock
- Rider cannot reach lock from mobility vehicle (poor balance, lack of core strength etc)
- Position of lock is in a corner so mobility vehicle cannot come alongside lock to reach it, even at an angle
- RADAR lock has not been well maintained and no longer works properly.
- Not all disabled people realise that a RADAR key will open the lock, and don't know how these kissing gates work. There must be an appropriate, informative, label beside the lock.

Board walks, Footbridges, Quad bike bridges

All of these structures should be designed to be appropriate for use by large mobility vehicles, be sufficiently wide and strong, and have toe boards (a deck level edge rail) as edge protection. On longer board walks there may also be a need to provide periodic passing places.

Sleeper bridges

Sleeper bridges are very often 3 sleepers wide, but they need to be at least 4 sleepers wide to allow for use by mobility vehicles.

Steps

Whenever possible, step free routes should be available to users of mobility vehicles. Existing steps could be replaced, or supplemented at the side, by a slope or ramp. Where this is not possible, an alternative route should be provided. Sometimes this might necessitate a short diversion, regaining the main route a little further on, and this diversion should be signed.

Cycle chicanes and staggered barriers

Cycle chicanes are, in most instances, impassable by mobility vehicles, in which case they should be replaced with an appropriate structure. Other forms of staggered barriers, such as those used to slow people down before a road, are very often equally impassable, especially for large mobility vehicles.

Undefined barriers, Motorcycle barriers, A frames, K barriers etc.

Motorcycle barriers are to be avoided. Often they form an intimidating, narrow gap. Frequently put in place to restrict the illegal access of motorcycle users, they should only ever be used after very careful consideration of the measured extent of the motorcycle problem, and after all other solutions have been considered. In some areas existing motorcycle barriers are no longer necessary as there is no longer a motorcycle problem: in these cases the barriers should be removed.

If no alternative is possible, the gap in the barrier should be adjusted to allow riders of large mobility vehicles to pass through. Mobility vehicles can legally be up to 85 cm wide so the gap should be at least this; and the same width should be allowed all the way up from the ground to enable room for handle bars, arm rests and other bodywork. The ground beneath should be level otherwise a greater width is needed. K barriers are often less

intimidating and allow for various options to be chosen, such a shallow squeeze plate which is positioned higher off the ground. <http://www.kbarriers.co.uk/>

Stepping stones

Stepping stones are a barrier to users of mobility vehicles, walkers who are less agile, and families with pushchairs. They should be replaced with a suitable alternative such as a footbridge (which, if not flush with the ground should have appropriate slopes at either end, not steps). If there are good reasons to retain the stepping stones, such as historic reasons, a suitable alternative should be provided nearby, in addition to the stepping stones.

Stiles

Stiles are a barrier to mobility vehicles, walkers who are less agile, and families with pushchairs. They should be replaced with suitable alternative infrastructure. If there are good reasons to retain the stile, such as historic reasons, an alternative to the stile, such as a pedestrian gate, should be provided nearby in addition to the stile.

Urban areas and Kerbs

In urban areas people with reduced mobility may well be using pavement scooters which have low ground clearance. Where the trail follows a footway (eg pavement) it should be sufficiently wide for large mobility vehicles, and free of obstructions. The provision and correct positioning of dropped kerbs at suitable places along the footway is essential. Every time the trail passes over a kerb, a dropped kerb should be provided.

Disabled Ramblers March 2020