

Coastal Access – Combe Martin to Marsland Mouth lengths CMM1 to CMM3, CMM5 to CMM7, CMM9 and CMM10



Representations with Natural England's comments

January 2021

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1. Introduction

This document records the representations Natural England has received on the proposals in length reports CMM1 to CMM3, CMM5 to CMM7, CMM9 and CMM10 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 Combe Martin to Marsland Mouth they are included here in so far as they are relevant to lengths CMM1 to CMM3, CMM5 to CMM7, CMM9 and CMM10 only.

2. Background

Natural England's compendium of reports setting out its proposals for improved access to the coast from Combe Martin to Marsland Mouth, comprising an overview and 10 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 40 representations pertaining to length reports CMM1 to CMM3, CMM5 to CMM7, CMM9 and CMM10, of which 15 were made by organisations or individuals whose representations must be sent in full to the Secretary of State in accordance with paragraph 8(1)(a) of Schedule 1A to the National Parks and Access to the Countryside Act 1949. These 'full' representations are reproduced in Section 4 in their entirety, together with Natural England's comments. Also included in Section 4 is a summary of the 25 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.

4. Representations and Natural England's comments on them

Length Report CMM1

Full representations

Representation ID:

MCA/CMM Stretch/R/1/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Complex roll-back

The Devon Countryside Access Forum notes the significant number of more complex rollback locations which have been identified in the reports. There is concern that there is no limit to how far inland roll-back might apply, given excepted land and environmental obligations. The Forum agrees that simple roll-back should take place. The Devon Countryside Access Forum advises that it does not seem appropriate for roll-back to take place in the complex situations cited in the reports. Roll-back does not provide any statutory process for consultation, and could impact on landowners hitherto unaware that their land could be affected.

The Devon Countryside Access Forum advises that it would be more appropriate to publish variation reports in these instances to formally allow landowners and others, such as the DCAF, to make objection or representation.

Natural England's comments

In our published Overview document we explain that ordinarily, where roll-back has been proposed and becomes necessary, we would expect the trail to be adjusted to follow the current feature (for example, the cliff edge or top of foreshore). Where we foresee that local circumstances will require more detailed consideration, we provided further information about the situation in the relevant report. We call this 'complex rollback'; such situations may include where the trail can't roll back in the normal way because of an obstruction, excepted land or because of environmental considerations.

We have taken and will continue to take all reasonable steps to discuss implications and options with all parties likely to be affected by such changes, both during the initial planning work that preceded the writing of the reports for each length, and during any future work to plan and implement a 'rolled back' route.

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

Representation ID:

MCA/CMM Stretch/R/2/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Signage and way-marking

The Devon Countryside Access Forum expects, as part of the implementation process, that signage and way-marking will be clear, especially at points of decision where paths may go in different directions. Signage should reflect the nature of the path and be appropriate to the landscape to avoid sign clutter or urbanisation. Users should be encouraged to have maps available, especially away from residential areas.

Natural England's comments

As part of the implementation process Natural England, together with the access authority, will ensure that signage is clear and appropriate, particularly at junctions.

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

Representation ID:

MCA/CMM Stretch/R/3/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full**Disability access**

The Devon Countryside Access Forum is aware that many sections of the coast path include man-made obstacles such as path furniture (stiles, steps and gate design), narrow chicanes or lack of drop kerbs which make access difficult for people with limited mobility. There are other instances where upgrades to path surface, width or drainage could make access easier. The Forum advises that Natural England considers this in implementing the England Coast Path in Devon and works with land managers and other partners to secure improvements. It may be possible to identify particular stretches of path where the gains to access would be most beneficial. While the Forum recognises that issues of topography might make accessing some areas challenging, there are often many simple actions which can be taken to improve access for disabled people.

To give an example, the kerb in this photo* (on the existing South West Coast Path) makes access through the gate difficult but could be replaced at modest cost with a ramp.

*See relevant appended document referred to below.

A number of specific issues were raised by the Disabled Ramblers representation (MCA/CMM1/R/6/CMM1527). These are discussed in more detail in Natural England's comments on their representation.

Natural England's comments

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Combe Martin to Marsland Mouth stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Because of current access restrictions, it may not be possible to agree specific new projects until the establishment phase of the process.

Relevant appended documents (see section 5):

*5A - MCA/CMM Stretch/R/3/CMM1324 - Photo accompanying Devon Countryside Access Forum (DCAF) representation

5B – MCA/CMM Stretch/R/3/CMM1324 - DCAF Disability Access Position Statement

Representation ID:

MCA/CMM1/R/3/CMM1249

Organisation/ person making representation:

[Redacted], Ramblers Association

Route section(s) specific to this representation:

CMM-1-S011 to CMM-1-S015

Other reports within stretch to which this representation also relates:

N/A

Representation in full

MAP CMM-1a Sections CMM-1-S011 to CMM-1-S015 and text in paragraph 1.3.3 Ramblers had hoped to see the road Newbery Close used as the route of the trail. If Newbery Close has been formally “stopped-up” by the relevant statutory process then that cannot happen. If Newbery Close is still a public highway then it is for the Highway Authority to take the appropriate action to remove the obstruction so that this becomes the route for the England Coast Path.

This matter was also raised by [redacted] MCA/CMM1/R/2/CMM1542

Natural England’s comments

We welcome the positive engagement from the Ramblers Association during the development of our proposals.

Newberry Close is no longer a public highway and there is no public right of way along it. The ‘old coast road’ is currently blocked by a large ‘garage’ construction for which the landowners received retrospective planning consent. Therefore at present it is not possible to use this route as part of the England Coast Path. We will recommend to the access authority that signage in the immediate vicinity is improved.

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

Representation ID:

MCA/CMM1/R/4/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

CMM-1-S025

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Watermouth Castle and The Warren

The Devon Countryside Access Forum notes and supports the change to avoid the car park and boatyard. (CMM-1-S025).

Natural England's comments

We welcome the positive engagement from Devon Countryside Access Forum during the development of our proposals and the supportive comments expressed in their representation.

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

Representation ID:

MCA/CMM1/R/5/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Map CMM 1d. Larkstone Beach, Ilfracombe to Seven Hills, Ilfracombe

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Lantern Hill

The Devon Countryside Access Forum supports the continuation of the existing South West Coast Path route to avoid steep steps. Public access is still available to this area.

Natural England's comments

We thank the Devon Countryside Access Forum for the supportive comments expressed in their representation.

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

Other representations**Representation ID:**

MCA/CMM1/R/1/CMM0687

Organisation/ person making representation:

[Redacted]

Name of site:

Widmouth Farm Holiday Cottages

Report map reference:

CMM 1b Broad Strand to Samson's Bay

Route sections on or adjacent to the land:

CMM-1-S032FP

Other reports within stretch to which this representation also relates**Summary of representation:**

Widmouth Farm Holiday Cottages have a private garden area seaward of the coast path at CMM-1-S032 FP. A path through the garden leads to Widmouth Beach, also owned by Widmouth Farm Holiday Cottages. [Redacted] state that the garden and therefore access to the beach is over 'excepted land' under schedule 1 to the CROW Act because it is land used as a park or garden.

The private garden and beach are a major attraction to guests who stay at Widmouth Holiday Cottages throughout the year. The local seal rescue group have also started releasing rescued and recuperated seals on the beach as it's a quiet, secluded and sheltered area. The garden is currently accessed via a gate with a 'private – no access to beach' sign.

[Redacted] keep a log of concerns [available on request] they have involving current public access to the beach including:

Littering in the garden

Lighting fires and barbeques, leaving litter on the beach and leaving glass, tins and uneaten food

Leaving static fishing lines [with floats and hooks attached] on the beach

Dog walkers allowing dog fouling in garden and on beach adding to sea pollution

Unauthorised launching of canoes, kayaks and paddle boards

Damage to garden plants and planters

Natural England's comment:

The access route to the beach runs through a garden and therefore the new rights of access would not apply because the land is excepted land under Schedule 1 to the CROW Act. Access to the beach may still apply, however as there is no other available access route to the beach from the cliff top, the public will be unlikely to access it.

Should they wish to, landowners may erect signs indicating the extent of excepted land, so long as they are not misleading.

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

Representation ID:

MCA/CMM1/R/2/CMM1542

Organisation/ person making representation:

[Redacted]

Name of site:

Road from Newberry Close to Barton Lane

Report map reference:

CMM 1a Combe Martin to Broad Strand

Route sections on or adjacent to the land:

CMM-1-S011 to CMM-1-S015

Other reports within stretch to which this representation also relates

Summary of representation:

It is suggested that the 'original' coast path along Newberry Close be reinstated rather than using the current route of the South West Coast Path alongside the busy A339 as the proposed route for the England Coast Path. The original route (last used in c.2010) had wonderful coastal views before being blocked by a development.

This matter was also raised by the Ramblers Association MCA/CMM1/R/3/CMM1249

Natural England's comment:

Newberry Close is no longer a public highway and there is no public right of way along it. The 'old coast road' is currently blocked by a large 'garage' construction for which the landowners received retrospective planning consent. Therefore at present it is not possible to use this route as part of the England Coast Path. We will recommend to the access authority that signage in the immediate vicinity is improved.

Relevant appended documents (see Section 5):

5C - **MCA/CMM1/R/2/CMM1542** - No access to former coast path

Representation ID:

MCA/CMM1/R/6/CMM1527

Organisation/ person making representation:

[Redacted] Disabled Ramblers

Name of site:

Report map reference:

CMM1a – Combe Martin Beach to Broad Strand

CMM1b – Broad Strand to Samson's Bay

CMM1c – Samson's Bay to Larkstone Beach,
Ilfracombe

CMM 1d – Larkstone Beach, Ilfracombe to Seven Hills, Ilfracombe

Route sections on or adjacent to the land:

All route sections

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

There is a 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 right of access that walkers do, so Natural England should ensure that any existing or new infrastructure along the Coast Path does not present a barrier to their ability to progress along the Coast Path. Natural terrain will, in places, prevent access and this is unavoidable, however man-made infrastructure can be changed. Unlike in other parts of England, the proposals for Devon and Cornwall, and therefore for Report CMM 1: Combe Martin Beach to Seven Hills, Ilfracombe, do not indicate what existing structures Natural England proposes to retain, or where they are. This lack of information means that Disabled Ramblers can only able comment on these proposals in a very general way with regard to existing man-made structures. It is anticipated that there are instances of man-made barriers that bar legitimate access to users of mobility vehicles. In urban areas it is important that there are dropped kerbs along the route of Coast Path.

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.
- Many of these issues were also raised by the Devon Countryside Access Forum MCA/CMM Stretch/R/3/CMM1324

Natural England's comment:

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar all-terrain vehicles difficult if not impossible. In some of our reports for the Combe Martin to Marsland Mouth stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Both we and the access authority agree in principle that gates should conform to the most recent British Standard and any new access furniture detailed in the Combe Martin to Marsland Mouth Coastal Access reports will be installed in compliance with BS 5709:2018, the British Standard for Gaps, Gates and Stiles.

Because of current access restrictions, it may not be possible to agree specific new projects until the establishment phase of the process.

Relevant appended documents (see Section 5):

5D MCA/CMM1/R/6/CMM1527 Disabled Ramblers – Notes on infrastructure

Length Report CMM2

Full representations

Representation ID:

MCA/CMM Stretch/R/1/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Complex roll-back

The Devon Countryside Access Forum notes the significant number of more complex rollback locations which have been identified in the reports. There is concern that there is no limit to how far inland roll-back might apply, given excepted land and environmental obligations. The Forum agrees that simple roll-back should take place. The Devon Countryside Access Forum advises that it does not seem appropriate for roll-back to take place in the complex situations cited in the reports. Roll-back does not provide any statutory process for consultation, and could impact on landowners hitherto unaware that their land could be affected.

The Devon Countryside Access Forum advises that it would be more appropriate to publish variation reports in these instances to formally allow landowners and others, such as the DCAF, to make objection or representation.

Natural England's comments

In our published Overview document we explain that ordinarily, where roll-back has been proposed and becomes necessary, we would expect the trail to be adjusted to follow the current feature (for example, the cliff edge or top of foreshore). Where we foresee that local circumstances will require more detailed consideration, we provided further information about the situation in the relevant report. We call this 'complex rollback'; such situations may include where the trail can't roll back in the normal way because of an obstruction, excepted land or because of environmental considerations.

We have taken and will continue to take all reasonable steps to discuss implications and options with all parties likely to be affected by such changes, both during the initial planning work that preceded the writing of the reports for each length, and during any future work to plan and implement a 'rolled back' route.

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

Representation ID:

MCA/CMM Stretch/R/2/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full**Signage and way-marking**

The Devon Countryside Access Forum expects, as part of the implementation process, that signage and way-marking will be clear, especially at points of decision where paths may go in different directions. Signage should reflect the nature of the path and be appropriate to the landscape to avoid sign clutter or urbanisation. Users should be encouraged to have maps available, especially away from residential areas.

Natural England's comments

As part of the implementation process Natural England, together with the access authority, will ensure that signage is clear and appropriate, particularly at junctions.

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

Representation ID:

MCA/CMM Stretch/R/3/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full**Disability access**

The Devon Countryside Access Forum is aware that many sections of the coast path include man-made obstacles such as path furniture (stiles, steps and gate design), narrow chicanes or lack of drop kerbs which make access difficult for people with limited mobility. There are other instances where upgrades to path surface, width or drainage could make access easier. The Forum advises that Natural England considers this in implementing the England Coast Path in Devon and works with land managers and other partners to secure improvements. It may be possible to identify particular stretches of path where the gains to access would be most beneficial. While the Forum recognises that issues of topography might make accessing some areas challenging, there are often many simple actions which can be taken to improve access for disabled people.

To give an example, the kerb in this photo* (on the existing South West Coast Path) makes access through the gate difficult but could be replaced at modest cost with a ramp.

*See relevant appended document referred to below.

A number of specific issues were raised by the Disabled Ramblers representation (MCA/CMM1/R/6/CMM1527). These are discussed in more detail in Natural England's comments on their representation.

Natural England's comments

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Combe Martin to Marsland Mouth stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Because of current access restrictions, it may not be possible to agree specific new projects until the establishment phase of the process.

Relevant appended documents (see section 5):

*5A - MCA/CMM Stretch/R/3/CMM1324 - Photo accompanying Devon Countryside Access Forum (DCAF) representation

5B – MCA/CMM Stretch/R/3/CMM1324 - DCAF Disability Access Position Statement

Representation ID:

MCA/CMM2/R/1/CMM1249

Organisation/ person making representation:

[Redacted], Ramblers Association

Route section(s) specific to this representation:

CMM-2-S042 to CMM-2-S050

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Map CMM 2f Sections CMM-2-S042 to CMM-2-S050 and text in paragraph 2.3.1. Within these sections "roll-back" is proposed for some sections but not for others. We do not see the reason for this apparent inconsistency. Why is "roll-back" not relevant or proposed for some sections?

Natural England's comments

We welcome the positive engagement from the Ramblers Association during the development of our proposals.

'Normal' roll-back has been proposed for route sections CMM-2-S046 to CMM-2-S048 but not for CMM-2-S042 to CMM-2-S045 and CMM-2-S049 to CMM-2-S050. This is based on the National Coastal Erosion Risk Mapping medium term (20-50 year) Shoreline Management Plan policy retreat distance indicating that, without active intervention, route sections CMM-2-S046 to CMM-2-S048 may be lost to coastal erosion in the medium term.

Relevant appended documents (see section 5):

N/A

Representation ID:

MCA/CMM2/R/2/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

CMM-2-S012 to CMM-2-S013

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Shag Point

The Devon Countryside Access Forum had suggested a more seaward route to avoid the road, (CMM-2-S012 and CMM-2-S013), but notes the comments about unstable cliffs and excepted land (gardens). Use of the current South West Coast Path route is therefore supported.

Natural England's comments

We welcome the positive engagement from Devon Countryside Access Forum during the development of our proposals and the supportive comments expressed in their representation.

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

Representation ID:

MCA/CMM2/R/3/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

CMM-2-S035 to CMM-2-S041

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Mortehoe

The Devon Countryside Access Forum supports the proposal for a newly created route offroad with spectacular views CMM 2-S035 to CMM-2-S041 will be a safer route, even with the two road crossing points.

Natural England's comments

We thank the Devon Countryside Access Forum for the supportive comments expressed in their representation.

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

Other representations

Representation ID:

MCA/CMM2/R/4/CMM1527

Organisation/ person making representation:

[Redacted] Disabled Ramblers

Name of site:

Seven Hills, Ilfracombe to Woolacombe

Report map reference:

Map CMM 2a Seven Hills, Ilfracombe to Flat Point

Map CMM 2b Flat Point to Lee Bay

Map CMM 2c Lee Bay to Bull Point Lighthouse

Map CMM 2d Bull Point Lighthouse to Oreweed Cove

Map CMM 2e Oreweed Cove to Sharp Rock, Morteheo

Map CMM 2f Sharp Rock, Morteheo to Woolacombe

Route sections on or adjacent to the land:

Specific comments on route sections:- CMM-2-S001 to CMM-2-S009

CMM-2-S036

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

There is a 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 right of access that walkers do, so Natural England should ensure that any existing or new infrastructure along the Coast Path does not present a barrier to their ability to progress along the Coast Path. Natural terrain will, in places, prevent access and this is unavoidable, however man-made infrastructure can be changed. Unlike in other parts of England, the proposals for Devon and Cornwall, and therefore for Report CMM 2: Seven Hills, Ilfracombe to Woolacombe, do not indicate what existing structures Natural England proposes to retain, or where they are. This lack of information means that Disabled Ramblers can only able comment on these proposals in a very general way with regard to

existing man-made structures. It is anticipated that there are instances of man-made barriers that bar legitimate access to users of mobility vehicles. In urban areas it is important that there are dropped kerbs along the route of Coast Path.

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 also made detailed comments on existing trail infrastructure causing specific access issues route sections.

- 1) There are 4 wooden steps at the very beginning of route section CMM-2-S001 which would make access in some mobility scooters difficult. Once past this point, current access along the coast is not practical due to the steep terrain and large numbers of steps. However access to the coast path could be made possible either via a public footpath off Upper Torrs or via Langleigh Lane. This would enable mobility scooter users to potentially access the dramatic coast path from Ilfracombe as far as the hamlet of Lee – a distance of nearly 4km. There are a couple of locations with (currently) difficult or inaccessible access issues (field gates and stiles).
- 2) Access issues with field and pedestrian gates at route sections CMM-2-S036 and CMM-2-S037.

Disability access issues were also raised by the Devon Countryside Access Forum MCA/CMM Stretch/R/3/CMM1324

Natural England's comment:

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar all-terrain vehicles difficult if not impossible. In some of our reports for the Combe Martin to Marsland Mouth stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access. Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified (including those relating to the steps at route section CMM-2-S001, the all-terrain mobility scooter 'alternative' route from Upper Torrs along Langleigh Lane linking the coast path between route section CMM-2-S001 and CMM-2-S008 and the gates at route sections CMM-2-S036 and CMM-2-S037), we will discuss their suggestions with the access authority and the landowners, including the National Trust. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Both we and the access authority agree in principle that gates should conform to the most recent British Standard and any new access furniture detailed in the Combe Martin to Marsland Mouth Coastal Access reports will be installed in compliance with BS 5709:2018, the British Standard for Gaps, Gates and Stiles.

Because of current access restrictions, it may not be possible to agree specific new projects until the establishment phase of the process.

Relevant appended documents (see Section 5):

5D - MCA/CMM2/R/4/CMM1527 – Disabled Ramblers – Notes on infrastructure

5E - MCA/CMM2/R/4/CMM1527 – Disabled Ramblers – specific comments on various route sections

Length Report CMM3

Full representations

Representation ID:

MCA/CMM Stretch/R/1/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Complex roll-back

The Devon Countryside Access Forum notes the significant number of more complex rollback locations which have been identified in the reports. There is concern that there is no limit to how far inland roll-back might apply, given excepted land and environmental obligations. The Forum agrees that simple roll-back should take place. The Devon Countryside Access Forum advises that it does not seem appropriate for roll-back to take place in the complex situations cited in the reports. Roll-back does not provide any statutory process for consultation, and could impact on landowners hitherto unaware that their land could be affected.

The Devon Countryside Access Forum advises that it would be more appropriate to publish variation reports in these instances to formally allow landowners and others, such as the DCAF, to make objection or representation.

Natural England's comments

In our published Overview document we explain that ordinarily, where roll-back has been proposed and becomes necessary, we would expect the trail to be adjusted to follow the current feature (for example, the cliff edge or top of foreshore). Where we foresee that local circumstances will require more detailed consideration, we provided further information about the situation in the relevant report. We call this 'complex rollback'; such situations may include where the trail can't roll back in the normal way because of an obstruction, excepted land or because of environmental considerations.

We have taken and will continue to take all reasonable steps to discuss implications and options with all parties likely to be affected by such changes, both during the initial planning work that preceded the writing of the reports for each length, and during any future work to plan and implement a 'rolled back' route.

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

Representation ID:

MCA/CMM Stretch/R/2/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Signage and way-marking

The Devon Countryside Access Forum expects, as part of the implementation process, that signage and way-marking will be clear, especially at points of decision where paths may go in different directions. Signage should reflect the nature of the path and be appropriate to the landscape to avoid sign clutter or urbanisation. Users should be encouraged to have maps available, especially away from residential areas.

Natural England's comments

As part of the implementation process Natural England, together with the access authority, will ensure that signage is clear and appropriate, particularly at junctions.

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

Representation ID:

MCA/CMM Stretch/R/3/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Disability access

The Devon Countryside Access Forum is aware that many sections of the coast path include man-made obstacles such as path furniture (stiles, steps and gate design), narrow chicanes or lack of drop kerbs which make access difficult for people with limited mobility. There are other instances where upgrades to path surface, width or drainage could make access easier. The Forum advises that Natural England considers this in implementing the England Coast Path in Devon and works with land managers and other partners to secure improvements. It may be possible to identify particular stretches of path where the gains to access would be most beneficial. While the Forum recognises that issues of topography might make accessing some areas challenging, there are often many simple actions which can be taken to improve access for disabled people.

To give an example, the kerb in this photo* (on the existing South West Coast Path) makes access through the gate difficult but could be replaced at modest cost with a ramp.

*See relevant appended document referred to below.

A number of specific issues were raised by the Disabled Ramblers representation (MCA/CMM1/R/6/CMM1527). These are discussed in more detail in Natural England's comments on their representation.

Natural England's comments

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Combe Martin to Marsland Mouth stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Because of current access restrictions, it may not be possible to agree specific new projects until the establishment phase of the process.

Relevant appended documents (see section 5):

*5A - MCA/CMM Stretch/R/3/CMM1324 - Photo accompanying Devon Countryside Access Forum (DCAF) representation

5B – MCA/CMM Stretch/R/3/CMM1324 - DCAF Disability Access Position Statement

Representation ID:

MCA/CMM3/R/5/CMM1249

Organisation/ person making representation:

[Redacted], Ramblers Association

Route section(s) specific to this representation:

CMM-3-A001 to CMM-3-A018

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Map CMM 3e, Sections CMM-3-A001 to CMM-3-A018 and text at paragraphs 3.2.12 and 3.3.2 Ramblers note the alternative “exceptional high tide” route proposed here but we suggest that a shorter “alternative route” is available. This uses existing public footpaths from the southerly end of section CMM-3-S029 south-easterly and then south-westerly to point CMM-3-S031, that is around the perimeter of Croyde Burrows Dunes as shown on the 1:25,000 scale OS Map. This route avoids a stretch of about 800 metres along the road or footway. Our route as suggested would of course be available anyway to those who chose to use it.

Natural England’s comments

We welcome the positive engagement from the Ramblers Association during the development of our proposals.

The alternative route at this location serves two purposes:-

- 1) when the main route is not passible (at very high tide and when the stream is in spate) it provides a way between the northern half of Croyde Sand and Down End/Cock Rock
- 2) a route between the northern section of Croyde Sands and Down End, suitable for those using mobility scooters. This route avoids the narrow path alongside the stream (often cut off), the uneven/broken surface (broken concrete, rocky substrate) at route section CMM-3-S031 and steps at route section CMM-3-S033.

The shorter alternative route suggested by the Ramblers is not suitable for those with push chairs or mobility scooters as it passes through the sand dunes at Cock Rock and comes out near the start of route section CMM-3-S031 (the uneven broken concrete path).

As indicated in the representation, the main route and the shorter routes suggested by the Ramblers Association will both be available for use by those who chose to do so.

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

Other representations

Representations containing similar or identical points

Representation ID

Organisation/ person making representation:

MCA/CMM3/R/3/CMM1540

[Redacted] – Ruda Holiday Park (Parkdean Resorts)

MCA/CMM3/R/4/CMM0585

[Redacted] – Down End Car Park (Croyde)

MCA/CMM3/R/6/CMM1524

[Redacted] – North Devon Coast AONB

Name of site:

Cock Rock, Croyde

Report map reference:

CMM 3e

Route sections on or adjacent to the land:

CMM-3-S031 to CMM-3-S033

Other reports within stretch to which this representation also relates

N/A

Summary of point:

The three representations raise two closely related points:-

- 1) Access over rocks below the cliff at Down End/Cock Rock
- 2) The impact of the alternative route on the wildlife of the area

These are summarised below:-

1) Access at Down End/Cock Rock

All three representations - from [redacted] (North Devon Coast AONB), [redacted] (Ruda Holiday Park, Parkdean Resorts) and [redacted] (owner of Down End car park, Croyde) have raised the issue of the current poor state of repair of the coast path at Down End/Cock Rock, Croyde. The old concrete walkway at the base of the cliffs has largely washed away making access over the rocks between the southern end of the main beach at Croyde to the small beach and access steps from the Down End car park below Cock Rock difficult/dangerous for the average beach goer. The poor access is impacting on both visitors to Croyde and local businesses.

The [redacted] and [redacted] representations point out that under the Marine and Coastal Access Act 2009 Natural England have a statutory duty to improve and maintain access to the English coastline.

There have been discussions between local businesses, the Devon Council rights-of-way officer, engineers and contractors, the South West Coast Path Association and the Ramblers Association to consider various potential options for making safer access at Down End/Cock Rock – from sleeper walkways, reinstating the concrete walkway, to the current idea - a raised metal grate 'Safegrid' type walkway, which they think would cause minimal impact on the geology of the site. Parkdean Resorts may be in a position to contribute to the costs of any proposed/agreed solution.

The location of the potential raised walkway is (just) within the Saunton to Baggy Point Coast Site of Special Scientific Interest. The area was notified as an SSSI because this section of the North Devon coast is of special interest for its range of geological exposures, and for its botanical features particularly maritime heathland, grassland and lichens.

Previous discussions between local interest groups (SWCPA, Devon Council rights-of-way and the Ramblers Association) and Natural England on how to improve access resulted in a disappointing negative response from Natural England.

2) Impact of the alternative route

The [redacted] and [redacted] representations comment on the proposed 'inland' alternative route and its potential impact on the sensitive habitats. They say that by encouraging walkers to use the alternative route, they may leave the path – especially in the vicinity of route section CMM3-A001. Croyde Burrows is a healthy system of sand dunes supporting many species, and is important in connecting areas of dunes along the coast. For example the rare brown-banded and moss carder bees present at Braunton Burrows, have recently been spotted in Croyde and on Baggy Point SSSI land and work is on-going to actively protect these potential new habitats. [Redacted] also suggests that the inland alternative route would lead to property owners erecting fences to stop the increase in loss of privacy. It would also probably increase the installation of unsightly wooden fences that are not a vernacular to the area and that the proposed funds could be used to rectify the current unsatisfactory and unsafe section of the path.

Both state that improving the access at Down End/Cock Rock may result in less usage of other routes through and adjacent to the sand dunes.

Natural England's comment:

1) Access at Down End/Cock Rock

The proposals to 'improve' the access over the rocks below Down End/Cock Rock have been discussed locally for some time. Devon Council Engineering Design Groups' preferred option at the site would be to reinstate the concrete walkway but they acknowledge that this would have the most impact on the SSSI. Their latest proposals (Feb 2020) are to use a raised metal grate 'Safegrid' type walkway. An initial design for such as walkway has been produced.

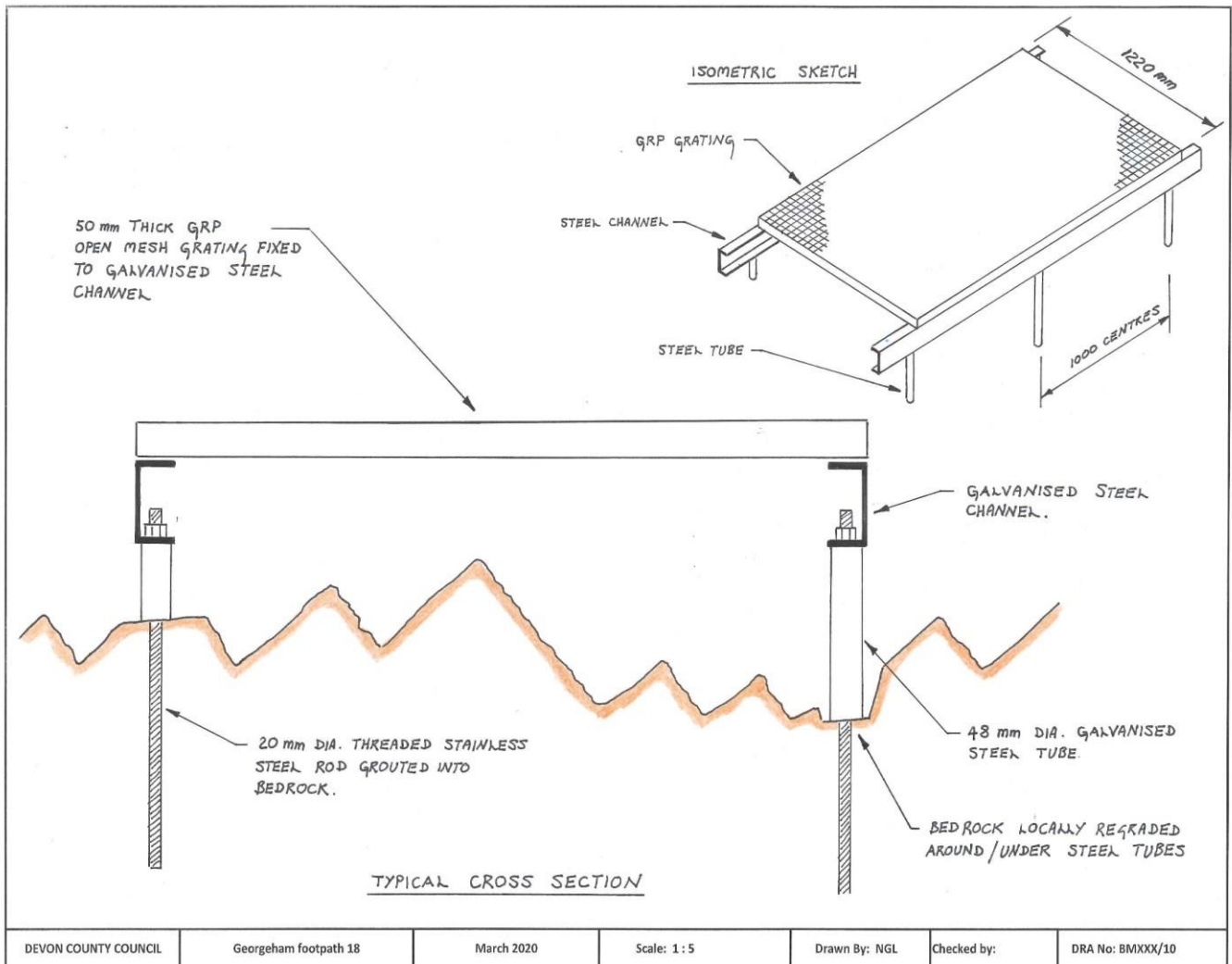
The line of the England Coast Path will use this route and we are expecting repairs to take place. Discussions are currently underway with Natural England specialists and the access authority about how best to take it forward.

2) Impact of the alternative route

The proposed alternative route provides a continuous route from Croyde Sands to Cock Rock, avoiding the northern part of route section CMM-3-S030 which is often cut off at high tide and when the stream is in full spate. It also provides a sign-posted route so that those less able walkers/visitors and those with pushchairs and mobility scooters can access the coast without having to follow the stream, go over the rocks at Down End/Cock Rock and climb the steps up to Down End car park.

The alternative route follows existing public footpaths and pavements alongside public highways. Where it passes through the 'nature reserve' (at route section CMM-3-A001) it is fenced on both sides.

On the point raised that people may start erecting fences we judge this to be unlikely given that the Alternative Route is on existing walked routes (public footpaths) and those people would be used to a certain level of public access.



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

Representation ID:

MCA/CMM3/R/1/CMM0116

Organisation/ person making representation:

[Redacted], Putsborough Sands

Name of site:

Putsborough Sands

Report map reference:

CMM 3 Woolacombe to Cock Rock, Croyde

CMM 3b – Woolacombe Warren to Putsborough

Route sections on or adjacent to the land:

CMM-3-S009

Other reports within stretch to which this representation also relates

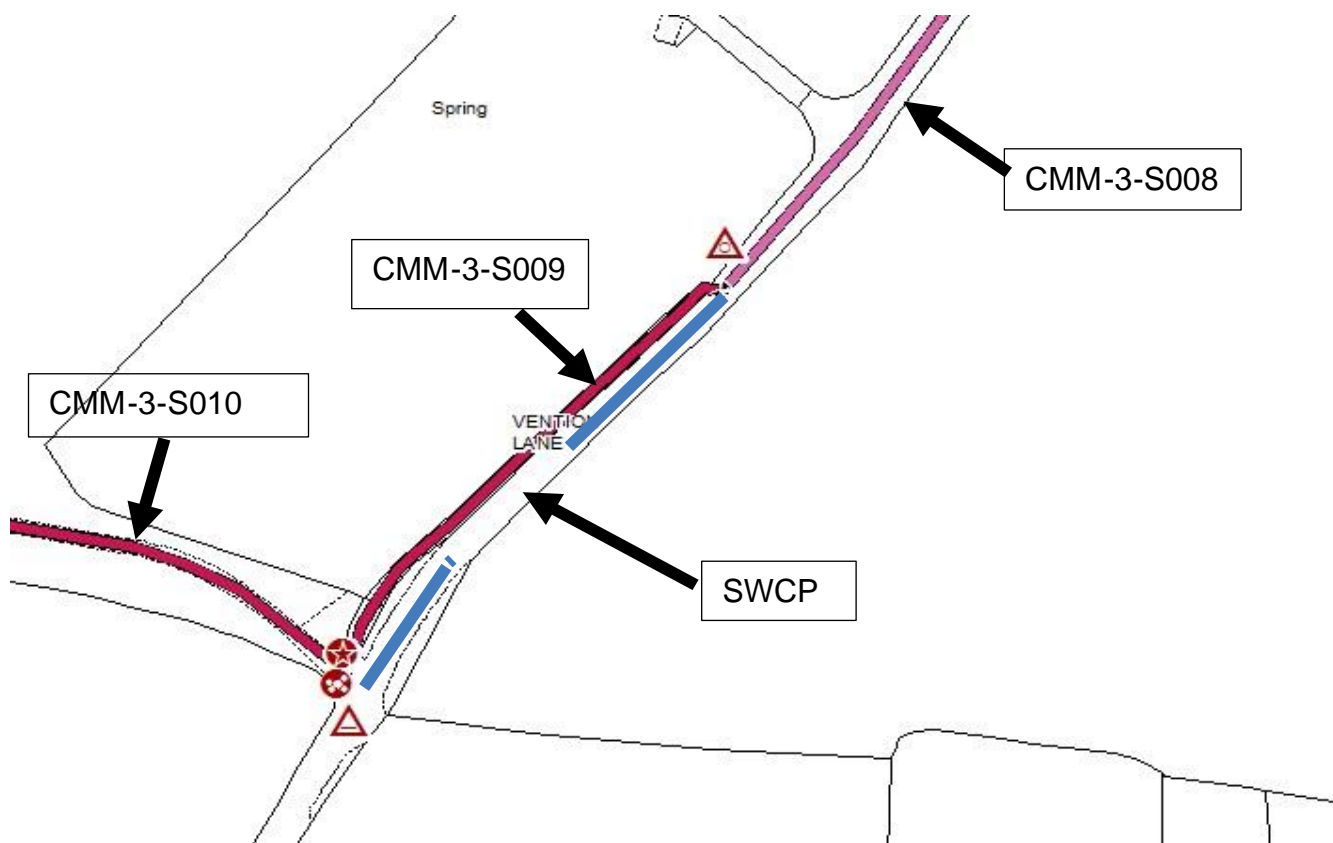
N/A

Summary of representation:

Proposed route currently shown on 'permissive path' immediately adjacent to the public highway/current route of the South West Coast Path. [Redacted] is content to provide this permissive route but does not want it to become the official England Coast Path route.

Natural England's comment:

The South West Coast Path (SWCP) follows the blue-dashed line on the map shown below. This is on the road (public highway) that leads to Putsborough Sands beach and caravan park and the properties at Vention and Cliff Court. The road is a cul-de-sac. The proposed England Coast Path (ECP) currently follows along route section CMM-3-S009. This is a narrow compacted soil path immediately adjacent to the road separated from it by a grass covered bank – see photo below. The permissive path is on land owned by [redacted].





Route section CMM-3-S009 (starts at the end of the post and rail fence and ends where the post and wire fence meets the bend in the road at top of photo).

The relocating of the proposed ECP onto the road (route section CMM-3-S008 is already on the road) will make little difference to walkers and would answer [redacted]'s request that the permissive path would not become the official ECP route.

Our proposals currently show that route section CMM-3-S009 '*follows the existing South West Coast Path*' (Length Report CMM 3 Woolacombe to Cock Rock, Croyde table 3.3.1) i.e. the road.

However what we have done is to specify the landward boundary as being the landward edge of the (permissive) path (for clarity and cohesion purposes) and our section number doesn't have the RD (road) suffix.

Natural England agree to [redacted]'s proposed amendment that the ECP should continue to follow the current route of the SWCP because we judge that it would make very little practical difference to the ECP user. This would mean a minor adjustment to the published map – moving the route by 1-2 metres onto the road, adding the suffix RD to route section to CMM3-S009 and updating table 3.3.1 to show that the landward boundary of the coastal margin is Road (landward edge) as opposed to Path (landward edge). The directing of the route along the road at this location has been agreed by the local Devon Council rights-of-way officer.

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

Representation ID:

MCA/CMM3/R/2/CMM0116

Organisation/ person making representation:

[Redacted], Putsborough Sands

Name of site:
Putsborough Sands

Report map reference:
CMM 3c – Putsborough to Cox Cliff

Route sections on or adjacent to the land:
CMM-3-S010

Other reports within stretch to which this representation also relates

Summary of representation:

There are a confusing number of footpaths shown on the maps. The OS 1:25,000 map shows a public footpath running parallel to and seaward of the proposed England Coast Path route (which follows the South West Coast Path). [Redacted] suggests that these could be removed to clarify the situation on the ground.

Natural England’s comment:

The Ordnance Survey decide what is shown on maps they publish. Natural England haven’t removed the paths because we use base mapping supplied by the OS and those public footpaths are still legally there.

The public footpath (shown on map CMM 3c and on the OS 1:25,000 maps) running parallel to and seaward of the proposed route of the England Coast does not appear to ‘used’ by walkers even though it is shown on OS maps. Walkers using the existing SWCP follow route section CMM-3-S010 from its junction with CMM-3-S009 in a westerly direction before reaching a finger post and then heading north west towards the junction with route section CMM-3-S011. Here we are proposing that the ECP follows the existing SWCP. Land seaward of the trail is in Coastal Margin and there would be accessible to the public.



Map CMM 3d.

[Redacted] (in a telephone conversation with [NE] in January 2020) also noticed that there was a 'mysterious' rectangle in one of his fields – see red arrow in map CMM 3d below. This appears to be a 'text box' that should have been deleted prior to publication of the CMM report.

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

Representation ID:

MCA/CMM3/R/7/CMM1527

Organisation/ person making representation:

[Redacted] Disabled Ramblers

Name of site:

Whole length

Report map reference:

- Map CMM 3a Woolacombe to Woolacombe Warren
- Map CMM 3b Woolacombe Warren to Putsborough
- Map CMM 3c Putsborough to Cox Cliff
- Map CMM 3d Cox Cliff to Middleborough Hill
- Map CMM 3e Middleborough Hill to Cock Rock, Croyde

Route sections on or adjacent to the land:

Specific comments on the following route sections:- CMM-3-S002 to CMM-3-S005 and Marine Drive

CMM-3-S009

CMM-3-S014 to CMM-3-S019

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

There is a 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 right of access that walkers do, so Natural England should ensure that any existing or new infrastructure along the Coast Path does not present a barrier to their ability to progress along the Coast Path. Natural terrain will, in places, prevent access and this is unavoidable, however man-made infrastructure can be changed. Unlike in other parts of England, the proposals for Devon and Cornwall, and therefore for Report CMM 3: Woolacombe to Cock Rock, Croyde, do not indicate what existing structures Natural England proposes to retain, or where they are. This lack of information means that Disabled Ramblers can only able comment on these proposals in a very general way with regard to existing man-made structures. It is anticipated that there are instances of man-made barriers that bar legitimate access to users of mobility vehicles. In urban areas it is important that there are dropped kerbs along the route of Coast Path.

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.

Specific comments on various route sections

Comment 1

Maps 3a and 3b route sections CMM-3-S002 to CMM-3-S005 and Marine Drive

Disabled Ramblers requests that Natural England

- Sign a diversion through the coastal margin around Marine Drive above Woolacombe Sand, and ensure there is no unsuitable infrastructure that would prevent mobility scooters from progressing along the diversion.

Comment 2

Map 3b route section CMM-3-S009

At the junction between CMM-3-S009 and CMM-3-S010, where the Coast Path leaves the cycle path, there is a stile, field gate and pedestrian gate. The field gate is not suitable for people who use mobility vehicles, and the pedestrian gate only opens one way, making it very difficult for users of mobility vehicles. The pedestrian gate should be replaced with a suitable gate that is two-way and self-closing.

Comment 3

Map 3d Baggy Point CMM-3-S014 to CMM-3-S019

At the junction of route sections CMM-3-S013 and CMM-3-S014 there is a stile which should be replaced with a suitable pedestrian gate to allow access to users of mobility vehicles.

- A. Because the lower path, (route section CMM-3-S018) is very narrow in places (in red, between Points 6 and 12 on the SWCP map), the upper route which is within the coastal margin landward of the England Coast Path should be used by mobility vehicles instead.
 - Natural England should ensure that warning signs and diversion signs are in place at either end of route section CMM-3-S018.
 - Within this area of coastal margin, there is a field gate (Point 17 on the SWCP map) which prevents onward progress for those using mobility vehicles. This field gate should be changed for another more suitable gate, or it might be possible for a pedestrian gate to be placed alongside a field gate if the path is widened at this point and the ground levelled.
- C. At CMM-3-S019 (Point 5 on the SWCP map) there is a one-way gate with a trombone handle. One-way gates are difficult to manage from a mobility vehicle, so it should be replaced with a two-way self-closing gate.

Disability access issues were also raised by the Devon Countryside Access Forum MCA/CMM Stretch/R/3/CMM1324

Natural England's comment:

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar all-terrain vehicles difficult if not impossible. In some of our reports for the Combe Martin to Marsland Mouth stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified (including those relating to the mobility scooter 'alternative' route at Woolacombe Down linking the coast path between route section CMM-3-S001 and CMM-3-S006, the gate at the junction between route sections CMM-3-S009 and CMM-2-S010 and the feasibility of an all-terrain mobility scooter route linking CMM-3-S013 and CMM-3-S019), we will discuss their suggestions with the access authority and the landowners, including the National Trust. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Both we and the access authority agree in principle that gates should conform to the most recent British Standard and any new access furniture detailed in the Combe Martin to Marsland Mouth Coastal Access reports will be installed in compliance with BS 5709:2018, the British Standard for Gaps, Gates and Stiles.

Because of current access restrictions, it may not be possible to agree specific new projects until the establishment phase of the process.

Relevant appended documents (see Section 5):

5D - MCA/CMM3/R/7/CMM1527 – Disabled Ramblers – Notes on infrastructure

5F - MCA/CMM3/R/7/CMM1527 – Disabled Ramblers – specific comments on various route sections

Length Report CMM5

Full representations

Representation ID:

MCA/CMM Stretch/R/1/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full**Complex roll-back**

The Devon Countryside Access Forum notes the significant number of more complex rollback locations which have been identified in the reports. There is concern that there is no limit to how far inland roll-back might apply, given excepted land and environmental obligations. The Forum agrees that simple roll-back should take place. The Devon Countryside Access Forum advises that it does not seem appropriate for roll-back to take place in the complex situations cited in the reports. Roll-back does not provide any statutory process for consultation, and could impact on landowners hitherto unaware that their land could be affected.

The Devon Countryside Access Forum advises that it would be more appropriate to publish variation reports in these instances to formally allow landowners and others, such as the DCAF, to make objection or representation.

Natural England's comments

In our published Overview document we explain that ordinarily, where roll-back has been proposed and becomes necessary, we would expect the trail to be adjusted to follow the current feature (for example, the cliff edge or top of foreshore). Where we foresee that local circumstances will require more detailed consideration, we provided further information about the situation in the relevant report. We call this 'complex rollback'; such situations may include where the trail can't roll back in the normal way because of an obstruction, excepted land or because of environmental considerations.

We have taken and will continue to take all reasonable steps to discuss implications and options with all parties likely to be affected by such changes, both during the initial planning work that preceded the writing of the reports for each length, and during any future work to plan and implement a 'rolled back' route.

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

Representation ID:

MCA/CMM Stretch/R/2/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Signage and way-marking

The Devon Countryside Access Forum expects, as part of the implementation process, that signage and way-marking will be clear, especially at points of decision where paths may go in different directions. Signage should reflect the nature of the path and be appropriate to the landscape to avoid sign clutter or urbanisation. Users should be encouraged to have maps available, especially away from residential areas.

Natural England's comments

As part of the implementation process Natural England, together with the access authority, will ensure that signage is clear and appropriate, particularly at junctions.

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

Representation ID:

MCA/CMM Stretch/R/3/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Disability access

The Devon Countryside Access Forum is aware that many sections of the coast path include man-made obstacles such as path furniture (stiles, steps and gate design), narrow chicanes or lack of drop kerbs which make access difficult for people with limited mobility. There are other instances where upgrades to path surface, width or drainage could make access easier. The Forum advises that Natural England considers this in implementing the England Coast Path in Devon and works with land managers and other partners to secure improvements. It may be possible to identify particular stretches of path where the gains to access would be most beneficial. While the Forum recognises that issues of topography might make accessing some areas challenging, there are often many simple actions which can be taken to improve access for disabled people.

To give an example, the kerb in this photo* (on the existing South West Coast Path) makes access through the gate difficult but could be replaced at modest cost with a ramp.

*See relevant appended document referred to below.

A number of specific issues were raised by the Disabled Ramblers representation (MCA/CMM1/R/6/CMM1527). These are discussed in more detail in Natural England's comments on their representation.

Natural England's comments

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Combe Martin to Marsland Mouth stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path

National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Because of current access restrictions, it may not be possible to agree specific new projects until the establishment phase of the process.

Relevant appended documents (see section 5):

*5A - MCA/CMM Stretch/R/3/CMM1324 - Photo accompanying Devon Countryside Access Forum (DCAF) representation

5B – MCA/CMM Stretch/R/3/CMM1324 - DCAF Disability Access Position Statement

Representation ID:

MCA/CMM5/R/2/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

CMM-5-S007

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Barnstaple

Although Natural England is proposing a route over the first crossing point of the river, CMM5-S007, in accordance with the legislation, the Devon Countryside Access Forum recognises the economic importance of signing walkers to Barnstaple and advises that appropriate and detailed signs to amenities and the town are installed.

The subject of this representation was also raised by the South West Coast Path Association - MCA/CMM5/R/1/CMM1522

Natural England's comments

We welcome the positive engagement from Devon Countryside Access Forum during the development of our proposals and the supportive comments expressed in their representation.

At the junction of route sections CMM-5-S005 and CMM-5-S006, the proposed England Coast Path and the 'Barnstaple' section of the current South West Coast Path (SWCP) will formally diverge – as explained in paragraph 5.2.5 of Length Report CMM 5.

5.2.5 The route across the A361 Taw Bridge at Barnstaple meets our requirement for the England Coast Path. However, it is the preference of stakeholders, for the South West Coast Path to remain on its current alignment along the Tarka Trail and across Barnstaple Long Bridge. Therefore we propose that the England Coast Path and the South West Coast Path will diverge –the South West Coast Path keeping its current approved route and the England Coast Path using the A361 Taw Bridge. Accordingly, a variation report will not bring the South West Coast Path into line with the England Coast Path at this location, and the two routes will remain separate.

We can confirm that appropriate signage will be used to advise walkers that they can continue to follow the SWCP to access the amenities available in Barnstaple.

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

Other representations

Representation ID:

MCA/CMM5/R/1/CMM1522

Organisation/ person making representation:

[Redacted], South West Coast Path Association

Name of site:

Velator to Taw Bridge, Barnstaple

Report map reference:

Map CMM 5d

Route sections on or adjacent to the land:

Route sections CMM-5-S006 to CMM-5-S008 inclusive

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

The Association is disappointed that Natural England has interpreted the Coastal Access criteria in a way that cuts off a length of the existing National Trail, the South West Coast Path (SWCP). In particular, there is concern that walkers' enjoyment of the range of facilities and historic interest in Barnstaple is, by this interpretation, absent to followers of the new National Trail. Rather than an improvement of recreational enjoyment as the spirit of the Act seeks, this seems to produce a negative result. Ideally, the Association would wish to see the England Coast Path route follow the current SWCP into Barnstaple.

If Natural England is adamant in its interpretation of the criteria, the Association would like to see the ECP and the SWCP formally deviate at Barnstaple, with the SWCP entering the town as at present, and this being recognised in the signing in addition to the signposting of facilities and amenities indicated in table 5.3.2 (on the lines of the formal deviation between ECP and SWCP at Plymouth, acknowledged in NE Report CKW 1). For the record, it should be noted that the Association wishes to see the formal line of the SWCP (and hopefully the ECP) in Barnstaple amended so that it follows the footpath on the south side of the Taw west of Barnstaple Long Bridge, to ensure this much better route than the old formal route is saved as a right of way.

The subject of this representation was also raised by the Devon Countryside Access Forum - MCA/CMM5/R/2/CMM1324

Natural England's comment:

The legislation is very clear that Natural England cannot align the England Path beyond the first public foot crossing. On the River Taw this is the A361 Taw Bridge at Barnstaple (CMM5-S007). As stated in paragraph 5.2.5 of our proposals it is our intention that beyond the bridge the existing South West Coast Path (SWCP) will remain in place. This will allow longdistance footpath users to continue their journey into the centre of Barnstaple. As explained in our comments on Devon Countryside Access Forum's representation - MCA/CMM Stretch/R/2/CMM1324, appropriate signage will be installed.

The Association's suggested changes to the SWCP cannot be dealt with as part of this England Coast Path approvals process. Our National Trails team will undertake to discuss with the access authority the suggested modification.

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

Length Report CMM6

Full representations

Representation ID:

MCA/CMM Stretch/R/1/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Complex roll-back

The Devon Countryside Access Forum notes the significant number of more complex rollback locations which have been identified in the reports. There is concern that there is no limit to how far inland roll-back might apply, given excepted land and environmental obligations. The Forum agrees that simple roll-back should take place. The Devon Countryside Access Forum advises that it does not seem appropriate for roll-back to take place in the complex situations cited in the reports. Roll-back does not provide any statutory process for consultation, and could impact on landowners hitherto unaware that their land could be affected.

The Devon Countryside Access Forum advises that it would be more appropriate to publish variation reports in these instances to formally allow landowners and others, such as the DCAF, to make objection or representation.

Natural England's comments

In our published Overview document we explain that ordinarily, where roll-back has been proposed and becomes necessary, we would expect the trail to be adjusted to follow the current feature (for example, the cliff edge or top of foreshore). Where we foresee that local circumstances will require more detailed consideration, we provided further information about the situation in the relevant report. We call this 'complex rollback'; such situations may include where the trail can't roll back in the normal way because of an obstruction, excepted land or because of environmental considerations.

We have taken and will continue to take all reasonable steps to discuss implications and options with all parties likely to be affected by such changes, both during the initial planning work that preceded the writing of the reports for each length, and during any future work to plan and implement a 'rolled back' route.

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

Representation ID:

MCA/CMM Stretch/R/2/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full**Signage and way-marking**

The Devon Countryside Access Forum expects, as part of the implementation process, that signage and way-marking will be clear, especially at points of decision where paths may go in different directions. Signage should reflect the nature of the path and be appropriate to the landscape to avoid sign clutter or urbanisation. Users should be encouraged to have maps available, especially away from residential areas.

Natural England's comments

As part of the implementation process Natural England, together with the access authority, will ensure that signage is clear and appropriate, particularly at junctions.

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

Representation ID:

MCA/CMM Stretch/R/3/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full**Disability access**

The Devon Countryside Access Forum is aware that many sections of the coast path include man-made obstacles such as path furniture (stiles, steps and gate design), narrow chicanes or lack of drop kerbs which make access difficult for people with limited mobility. There are other instances where upgrades to path surface, width or drainage could make access easier. The Forum advises that Natural England considers this in implementing the England Coast Path in Devon and works with land managers and other partners to secure improvements. It may be possible to identify particular stretches of path where the gains to access would be most beneficial. While the Forum recognises that issues of topography might make accessing some

areas challenging, there are often many simple actions which can be taken to improve access for disabled people.

To give an example, the kerb in this photo* (on the existing South West Coast Path) makes access through the gate difficult but could be replaced at modest cost with a ramp.

*See relevant appended document referred to below.

A number of specific issues were raised by the Disabled Ramblers representation (MCA/CMM1/R/6/CMM1527). These are discussed in more detail in Natural England's comments on their representation.

Natural England's comments

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Combe Martin to Marsland Mouth stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Because of current access restrictions, it may not be possible to agree specific new projects until the establishment phase of the process.

Relevant appended documents (see section 5):

*5A - MCA/CMM Stretch/R/3/CMM1324 - Photo accompanying Devon Countryside Access Forum (DCAF) representation

5B – MCA/CMM Stretch/R/3/CMM1324 - DCAF Disability Access Position Statement

Representation ID:

MCA/CMM6/R/4/CMM1249

Organisation/ person making representation:

[Redacted], Ramblers Association

Route section(s) specific to this representation:

CMM-6-S002, CMM-6-S008, CMM-6-S014, CMM-6-S025

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Comment 1

MAP 6b section CMM-6-S002 and text at paragraph 6.3.3 Penhill Point. There is some inconsistency in your options here as Penhill Point is within the area of your Direction as shown

at Directions Map CMM 6B. Thus the headland is not available as spreading room as your text states.

Comment 2

MAPS 6e and 6i, Section CMM-6-S008 and CMM-6-S025 and text at paragraph 6.2.24
Ramblers note the reference to the possible need for revisions to the route at these locations for reasons of development. We suggest that the retention or creation of a seaward route at each of these locations is paramount and should have a greater priority over any commercial development. We ask that the relevant planning authority (North Devon / Torridge ?) take this into account as a condition of any planning application

Comment 3

MAP 6e Section CMM-6- S008 and text at paragraph 6.2.28 (Fencing) Ramblers request that the 300m of fencing here referred to is of such height so as not to impede the seaward views and enjoyment of the area.

The points at Comment 2 and 3 are also raised by the South West Coast Path Association - MCA/CMM6/R/6/CMM1522

Natural England's comments

We welcome the positive engagement from the Ramblers Association during the development of our proposals.

Comment 1 (Penhill Point)

The fields making up much of Penhill Point are not included in the access restriction and the headland forms part of the coastal margin and is therefore available as 'spreading room'. The point itself is also still accessible. The direction to exclude access applies only to saltmarsh and mudflat - as unsuitable for public access.

Comment 2 (Yelland Quay)

In the event that these developments go ahead we would like to see waterside routes retained in these locations. This is an aspiration that we know to be shared by the Devon Council rights of way team. Natural England would be happy to discuss with the developers ideas for how this could be achieved.

Comment 3 (Yelland Quay)

The proposed fencing on the seaward side of the path is to deter loose dogs from entering and disturbing the high tide water bird roost to the north of Paige's Pill. It will not impede the seaward views at this location.

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

Other representations

Representations containing similar or identical points

Representation ID

MCA/CMM6/R/1/CMM1536

Organisation/ person making representation:

[Redacted] and [redacted]

MCA/CMM6/R/2/CMM1537
[Redacted]

MCA/CMM6/R/3/CMM1539
[Redacted]

MCA/CMM6/R/5/CMM1543
[Redacted] (Gaia Trust)

MCA/CMM6/R/7/CMM1545
[Redacted]

MCA/CMM6/R/8/CMM1546
[Redacted]

Name of site:

Home Farm Marsh – The Gaia Trust

Report map reference:

Maps CMM6c and CMM6d

Route sections on or adjacent to the land:

Section CMM-6-S006

Other reports within stretch to which this representation also relates

N/A

Summary of point:

Home Farm Marsh is owned by the Gaia Trust and managed as a nature reserve. Its key focus is to create a safe haven for winter roosting ducks and waders as well as for ground nesting birds. As part of the management of the reserve, the Gaia Trust have for a number of years imposed a 'no dogs' policy.

All six representations supported the proposal to restrict access to Home Farm Marsh by means of a direction under section 26(3)(a) of the Countryside and Rights of Way Act (2000). Under this direction access to the land in the coastal margin adjacent to route section CMM-6S006 is to be excluded for people with dogs (except assistance dogs) all year round in order to prevent disturbance to birds.

Natural England's comment:

We welcome the positive engagement from the Gaia Trust during the development of our proposals and the supportive comments expressed in theirs and other representations.

Relevant appended documents (see Section 5):

N/A

Representation ID:

MCA/CMM6/R/6/CMM1522

Organisation/ person making representation:

[Redacted], South West Coast Path Association

Name of site:

Yelland Quay

Report map reference:

Map CMM 6e

Route sections on or adjacent to the land:

Route section CMM-6-S008

Other reports within stretch to which this representation also relates**Summary of representation:****Point 1**

Route section CMM-6-S008 follows the line of the current SWCP and is supported by the Association.

It is noted, however, that Report para 6.2.24 refers to “the need for future changes....for development reasons.” Further, the Overview document related to this report indicates in Section 7 that in any development discussions “the route of the ECP is fully considered.” The Association would strongly suggest that a stronger commitment to the proposed route is required and that no changes should be considered here for development reasons and that rather than its route being “fully considered” it should be fully protected. It is understood that the establishment of the ECP should not mean a ban on development, but at this point the ECP follows an existing National Trail on a dedicated public right of way, the implications of which are fully known by developers.

Point 2

Fencing adjacent to the route on its seaward side being proposed over 300m. No details are set out, but it is important that any such fencing should not impede seaward views so as to lessen the enjoyment of users of the route.

The points raised by the SWCPA were also raised by the Ramblers Association - MCA/CMM6/R/4/CMM1249

Natural England’s comment:

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

Point 1

We would like to see a waterside route retained in this location, however planning policy is a matter for the planning authority and not Natural England.

Point 2

The proposed fencing on the seaward side of the path is to deter those loose dogs from entering and disturbing the high tide water bird roost to the north of Paige’s Pill. It will not impede the seaward views at this location.

Relevant appended documents (see Section 5):

N/A

Representation ID:

MCA/CMM6/R/9/CMM1527

Organisation/ person making representation:

[Redacted] Disabled Ramblers

Name of site:**Report map reference:**

- Map CMM 6a Taw Bridge, Barnstaple to Bickington
- Map CMM 6b Bickington to Fremington Quay
- Map CMM 6c Fremington Quay to Home Farm Marsh
- Map CMM 6d Home Farm Marsh to East Yelland Marsh
- Map CMM 6e East Yelland Marsh to Instow Barton Marsh
- Map CMM 6f Instow Barton Marsh to The Quay (Instow)
- Map CMM 6g The Quay (Instow) to Westleigh
- Map CMM 6h Westleigh to Colley Moor Plantation
- Map CMM 6i Colley Moor Plantation to Bideford Long Bridge

Route sections on or adjacent to the land:

Specific route sections:-

- Route section CMM-6-S014
- Junction of route sections CMM-6-S020 to CMM6-S0021
- Diversion for route sections CMM-6-S022 and to CMM-6-S026

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

There is a 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 right of access that walkers do, so Natural England should ensure that any existing or new infrastructure along the Coast Path does not present a barrier to their ability to progress along the Coast Path. Natural terrain will, in places, prevent access and this is unavoidable, however man-made infrastructure can be changed. Unlike in other parts of England, the proposals for Devon and Cornwall, and therefore for Report CMM 6: Taw Bridge, Barnstaple to Bideford Long Bridge, do not indicate what existing structures Natural England proposes to retain, or where they are. This lack of information means that Disabled Ramblers can only able comment on these proposals in a very general way with regard to existing man-made structures. It is anticipated that there are instances of man-made barriers that bar legitimate access to users of mobility vehicles. In urban areas it is important that there are dropped kerbs along the route of Coast Path.

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.

Comment 1

Route section CMM-6-S014

Field gates with narrow gaps (just wide enough for mobility scooters) beside them and uneven surfaces. Disabled Ramblers requests that the path at these points should be levelled.

Comment 2

Junction of route sections CMM-6-S020 to CMM-6-S0021. Barrier at entrance is too narrow for mobility scooter access. Disabled Ramblers request that the barrier/gates be removed and replaced with a suitable structure that will allow mobility scooter access but prevent other unauthorised access.

Comment 3

Diversion for route sections CMM-6-S022 and to CMM-6-S0026. Gap in wall at junction between CMM-6-S022 and CMM-6-S023 is too narrow for mobility scooters. Disabled Ramblers request that a suitable diversion be sign-posted.

Natural England's comment:

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar all-terrain vehicles difficult if not impossible. In some of our reports for the Combe Martin to Marsland Mouth stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified (including those relating to the narrow gaps at the field gates along route section CMM-6-S014, the barrier blocking access at the junction between route section CMM-6-S020 and CMM-6-S021 and the 'alternative' mobility scooter route between route sections CMM-6-S022 and CMM-6-S026), we will discuss their suggestions with the access authority and the landowners, including the National Trust. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Both we and the access authority agree in principle that gates should conform to the most recent British Standard and any new access furniture detailed in the Combe Martin to Marsland Mouth Coastal Access reports will be installed in compliance with BS 5709:2018, the British Standard for Gaps, Gates and Stiles.

Because of current access restrictions, it may not be possible to agree specific new projects until the establishment phase of the process.

Relevant appended documents (see Section 5):

5G MCA/CMM4/R/9/CMM1527 - Disabled Ramblers – specific comments

Length Report CMM7

Full representations

Representation ID:

MCA/CMM Stretch/R/1/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Complex roll-back

The Devon Countryside Access Forum notes the significant number of more complex rollback locations which have been identified in the reports. There is concern that there is no limit to how far inland roll-back might apply, given excepted land and environmental obligations. The Forum agrees that simple roll-back should take place. The Devon Countryside Access Forum advises that it does not seem appropriate for roll-back to take place in the complex situations cited in the reports. Roll-back does not provide any statutory process for consultation, and could impact on landowners hitherto unaware that their land could be affected.

The Devon Countryside Access Forum advises that it would be more appropriate to publish variation reports in these instances to formally allow landowners and others, such as the DCAF, to make objection or representation.

Natural England's comments

In our published Overview document we explain that ordinarily, where roll-back has been proposed and becomes necessary, we would expect the trail to be adjusted to follow the current feature (for example, the cliff edge or top of foreshore). Where we foresee that local circumstances will require more detailed consideration, we provided further information about the situation in the relevant report. We call this 'complex rollback'; such situations may include where the trail can't roll back in the normal way because of an obstruction, excepted land or because of environmental considerations.

We have taken and will continue to take all reasonable steps to discuss implications and options with all parties likely to be affected by such changes, both during the initial planning work that preceded the writing of the reports for each length, and during any future work to plan and implement a 'rolled back' route.

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

Representation ID:

MCA/CMM Stretch/R/2/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Signage and way-marking

The Devon Countryside Access Forum expects, as part of the implementation process, that signage and way-marking will be clear, especially at points of decision where paths may go in different directions. Signage should reflect the nature of the path and be appropriate to the landscape to avoid sign clutter or urbanisation. Users should be encouraged to have maps available, especially away from residential areas.

Natural England's comments

As part of the implementation process Natural England, together with the access authority, will ensure that signage is clear and appropriate, particularly at junctions.

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

Representation ID:

MCA/CMM Stretch/R/3/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Disability access

The Devon Countryside Access Forum is aware that many sections of the coast path include man-made obstacles such as path furniture (stiles, steps and gate design), narrow chicanes or lack of drop kerbs which make access difficult for people with limited mobility. There are other instances where upgrades to path surface, width or drainage could make access easier. The Forum advises that Natural England considers this in implementing the England Coast Path in Devon and works with land managers and other partners to secure improvements. It may be possible to identify particular stretches of path where the gains to access would be most beneficial. While the Forum recognises that issues of topography might make accessing some areas challenging, there are often many simple actions which can be taken to improve access for disabled people.

To give an example, the kerb in this photo* (on the existing South West Coast Path) makes access through the gate difficult but could be replaced at modest cost with a ramp.

*See relevant appended document referred to below.

A number of specific issues were raised by the Disabled Ramblers representation (MCA/CMM1/R/6/CMM1527). These are discussed in more detail in Natural England's comments on their representation.

Natural England's comments

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Combe Martin to Marsland Mouth stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Because of current access restrictions, it may not be possible to agree specific new projects until the establishment phase of the process.

Relevant appended documents (see section 5):

*5A - MCA/CMM Stretch/R/3/CMM1324 - Photo accompanying Devon Countryside Access Forum (DCAF) representation

5B – MCA/CMM Stretch/R/3/CMM1324 - DCAF Disability Access Position Statement

Representation ID:

MCA/CMM7/R/1/CMM1249

Organisation/ person making representation:

[Redacted], Ramblers Association

Route section(s) specific to this representation:

CMM-7-S048 to CMM-7-S052

CMM-7-S071 to CMM-7-S073

CMM-7-S074 to CMM-7-S077

Other reports within stretch to which this representation also relates:

N/A

Representation in full

- 1. MAP CMM 7c Sections CMM-7-S048 to CMM-7-S052** and text in paragraphs 7.3.2 and 7.3.4. In relation to the “roll-back” at these sections and the possibility of a “new route landward” we are aware of a recent planning application which may be of relevance to any future re-routing.
- 2. MAP CMM 7f Sections CMM-7-S071 to CMM-7- S073** and text at paragraphs 7.2.5 and 7.3.2. We suggest that the inland routing of the trail around the cricket ground is unnecessary. . Any problems with the more direct route of the existing South West Coast

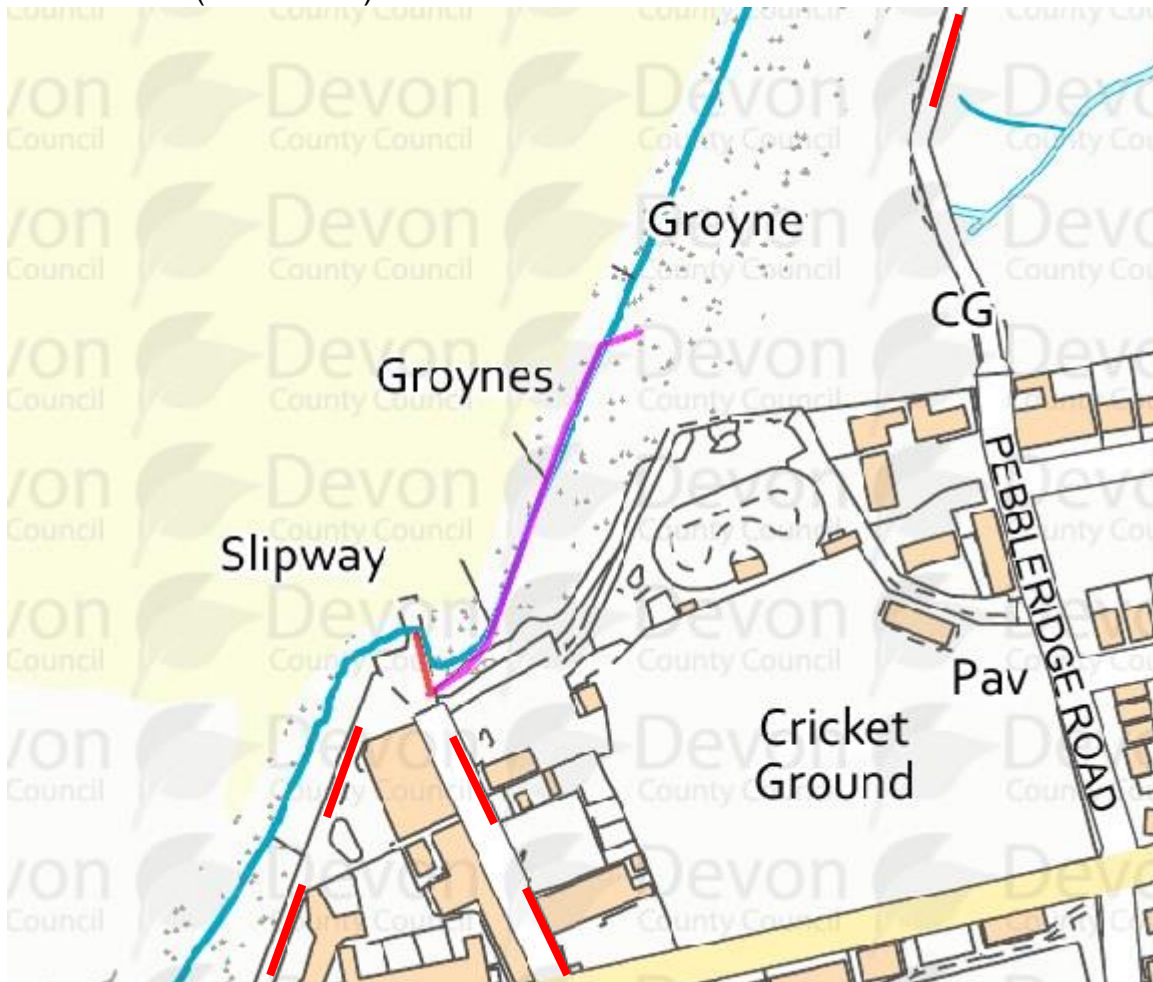
Path have been fairly minimal. The existing route is the more seaward and is preferable to the use of the public highway.

3. **MAP CMM 7f Sections CMM-7-S074 to CMM-7-S077** and text in paragraph 7.3.1. there appears to be some inconsistency between these sections as to “roll-back”. Is not roll-back applicable to all 4 of these sections since they appear to be similar terrain?

Natural England’s comments

We welcome the positive engagement from the Ramblers Association during the development of our proposals.

1. Natural England is also aware of the recent planning application for a development landward of route section CMM-7-S052 and the proposal to create a new ‘cut through’ from the current route of the South West Coast Path (SWCP) to the pavement along Torridge Road. The current route of the SWCP is a public footpath and the access authority have recently undertaken stabilisation work to secure the route of the path.
2. There are two routes seaward of the cricket ground at Westward Ho! One (magenta line) is a public footpath, the other (green dashes) is a ‘permissive path’ (and used to be the route of the SWCP). The proposed England Coast Path (ECP) follows the current SWCP route (red dashes).



Because of on-going erosion and stability issues on the permissive path and the public footpath at Pebble Ridge, the access authority have rerouted and signed the SWCP on pavements landward of the cricket ground. We intend to follow the current route of the SWCP for the ECP. Both the public footpath and permissive path will remain available for use for now. Utilising the current route of the SWCP as the proposed ECP landward of the cricket ground is supported by the local access authority.

3. No roll-back has been proposed for route sections CMM-7-S074 to CMM-7-S075 but has been proposed for CMM-7-S076 to CMM-7-S077. This is based on the National Coastal Erosion Risk Mapping short term (0-20 year) Shoreline Management Plan policy retreat distance indicating that, without active intervention, route sections CMM7-S076 to CMM-7-S077) may be lost to coastal erosion in the short term.

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

Other representations

Representation ID:

MCA/CMM7/R/2/CMM1527

Organisation/ person making representation:

[Redacted] Disabled Ramblers

Name of site:

Report map reference:

- Map CMM 7a Bideford Longbridge to Limers Lane, Orchard Hill
- Map CMM 7b Limers Lane, Orchard Hill to Wooda Farm
- Map CMM 7c Wooda Farm to Watertown
- Map CMM 7d Watertown to Northam Burrows Country Park
- Map CMM 7e Northam Burrows Country Park
- Map CMM 7f Northam Burrows Country Park to Westward Ho!

Route sections on or adjacent to the land:

1. Route section CMM-7-S002 River Bank Long Stay Carpark.
2. Route sections CMM-7-S005 and CMM-7-S012
3. Route sections CMM-7-S022
4. Map CMM 2b, route sections CMM-7-S022 to CMM7-S037
5. Route sections CMM-7-S039 to CMM-7-S053
6. Route sections CMM-7-S056 to CMM-7-S058
7. Route sections CMM-7-S059 to CMM-7-S070

Northam Burrows Country Park and Coastal Margin Landward of the Trail

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

There is a 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 right of access that walkers do, so Natural England should ensure that any existing or new infrastructure along the Coast Path does not present a barrier to their ability to progress along the Coast Path. Natural terrain will, in places, prevent access and this is unavoidable, however man-made infrastructure can be changed. Unlike in

other parts of England, the proposals for Devon and Cornwall, and therefore for Report CMM 7: Bideford Long Bridge to Westward Ho!, do not indicate what existing structures Natural England proposes to retain, or where they are. This lack of information means that Disabled Ramblers can only able comment on these proposals in a very general way with regard to existing man-made structures. It is anticipated that there are instances of man-made barriers that bar legitimate access to users of mobility vehicles. In urban areas it is important that there are dropped kerbs along the route of Coast Path. 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.

Many of these points were also raised by the Devon Countryside Access Forum MCA/CMM Stretch/R/3/CMM1324

The Disabled Ramblers also made detailed comments on existing trail infrastructure/features causing specific access issues route sections:-

Comment 1

Route section CMM-7-S002 River Bank Long Stay Car park. Lack of dropped kerbs and signage and a poorly opening gate.

Comment 2

Route sections CMM-7-S005 and CMM-7-S012 Narrow footpaths at the Council Offices and Chircombe Lane

Comment 3

Route section CMM-7-S022. Concrete bollards prevent access.

Comment 4

Route sections CMM-7-S022 to CMM-7-S037. A range of accessibility issues including awkwardly cambered paths, steep steps, narrow boardwalks and stiles/gates.

Comment 5

Route sections CMM-7-S039 to CMM-7-S053, Appledore. A need for some dropped kerbs. Also a signed diversion to avoid the steps near the RNLI lifeboat station.

Comment 6

Route sections CMM-7-S056 to CMM-7-S058. A request that the new Watertown route be suitable for mobility scooter access.

Comment 7

Route sections CMM-7-S059 to CMM-7-S070. Northam Burrows Country Park and Coastal Margin Landward of the Trail. Route is too difficult for many mobility scooters – soft sand, shingle and some man-made obstacles. Request that a suitable ‘inland’ route for mobility scooters be sign-posted.

Natural England's comment:

We welcome the positive engagement from the Disabled Ramblers during the development of our proposals.

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar all-terrain vehicles difficult if not impossible. In some of our reports for the Combe Martin to Marsland Mouth stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified (we will discuss their suggestions with the access authority and the landowners. These locations include the lack of dropped kerbs & awkward gate along route section CMM-7-S002; the narrow paths/pavements at Chircombe, between route sections CMM-7-S004 and CNN-7-S012; the concrete bollards at route section CMM-7S022; a range of issues between CMM-7-S022 and CMM-7-S037 including narrow boardwalks, difficult to open gates and steep steps; the lack of dropped kerbs along Irsha Street, Appledore - route sections CMM-7-S044 to CMM-7-S046; the 'alternative' mobility scooter routes around the RNLI Lifeboat Station in Appledore – route sections CMM-7-S047 to CMM-7-S055 and through Northam Burrows – route sections CMM-7-S059 to CMM-7-S070. The infrastructure along the new route at Watertown (route sections CMM-7-S056 to CMM-7-S058) will be installed in compliance with BS 5709:2018, the British Standard for Gaps, Gates and Stiles and will be suitable for mobility scooter access (see paragraph 7.2.28 Report CMM 7: Bideford Long Bridge to Westward Ho!).

Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Both we and the access authority agree in principle that gates should conform to the most recent British Standard and any new access furniture detailed in the Combe Martin to Marsland Mouth Coastal Access reports will be installed in compliance with BS 5709:2018, the British Standard for Gaps, Gates and Stiles.

Because of current access restrictions, it may not be possible to agree specific new projects until the establishment phase of the process.

Relevant appended documents (see Section 5):

5D – **MCA/CMM7/R/2/CMM1527** - Disabled Ramblers – Notes on infrastructure

5H - **MCA/CMM7/R/2/CMM1527** - Disabled Ramblers – specific comments on sections

Length Report CMM9

Full representations**Representation ID:**

MCA/CMM Stretch/R/1/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full**Complex roll-back**

The Devon Countryside Access Forum notes the significant number of more complex rollback locations which have been identified in the reports. There is concern that there is no limit to how far inland roll-back might apply, given excepted land and environmental obligations. The Forum agrees that simple roll-back should take place. The Devon Countryside Access Forum advises that it does not seem appropriate for roll-back to take place in the complex situations cited in the reports. Roll-back does not provide any statutory process for consultation, and could impact on landowners hitherto unaware that their land could be affected.

The Devon Countryside Access Forum advises that it would be more appropriate to publish variation reports in these instances to formally allow landowners and others, such as the DCAF, to make objection or representation.

Natural England's comments

In our published Overview document we explain that ordinarily, where roll-back has been proposed and becomes necessary, we would expect the trail to be adjusted to follow the current feature (for example, the cliff edge or top of foreshore). Where we foresee that local circumstances will require more detailed consideration, we provided further information about the situation in the relevant report. We call this 'complex rollback'; such situations may include where the trail can't roll back in the normal way because of an obstruction, excepted land or because of environmental considerations.

We have taken and will continue to take all reasonable steps to discuss implications and options with all parties likely to be affected by such changes, both during the initial planning work that preceded the writing of the reports for each length, and during any future work to plan and implement a 'rolled back' route.

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

Representation ID:

MCA/CMM Stretch/R/2/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full**Signage and way-marking**

The Devon Countryside Access Forum expects, as part of the implementation process, that signage and way-marking will be clear, especially at points of decision where paths may go in different directions. Signage should reflect the nature of the path and be appropriate to the landscape to avoid sign clutter or urbanisation. Users should be encouraged to have maps available, especially away from residential areas.

Natural England's comments

As part of the implementation process Natural England, together with the access authority, will ensure that signage is clear and appropriate, particularly at junctions.

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

Representation ID:

MCA/CMM Stretch/R/3/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Disability access

The Devon Countryside Access Forum is aware that many sections of the coast path include man-made obstacles such as path furniture (stiles, steps and gate design), narrow chicanes or lack of drop kerbs which make access difficult for people with limited mobility. There are other instances where upgrades to path surface, width or drainage could make access easier. The Forum advises that Natural England considers this in implementing the England Coast Path in Devon and works with land managers and other partners to secure improvements. It may be possible to identify particular stretches of path where the gains to access would be most beneficial. While the Forum recognises that issues of topography might make accessing some areas challenging, there are often many simple actions which can be taken to improve access for disabled people.

To give an example, the kerb in this photo* (on the existing South West Coast Path) makes access through the gate difficult but could be replaced at modest cost with a ramp.

*See relevant appended document referred to below.

A number of specific issues were raised by the Disabled Ramblers representation (MCA/CMM1/R/6/CMM1527). These are discussed in more detail in Natural England's comments on their representation.

Natural England's comments

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Combe Martin

to Marsland Mouth stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Because of current access restrictions, it may not be possible to agree specific new projects until the establishment phase of the process.

Relevant appended documents (see section 5):

*5A - MCA/CMM Stretch/R/3/CMM1324 - Photo accompanying Devon Countryside Access Forum (DCAF) representation

5B – MCA/CMM Stretch/R/3/CMM1324 - DCAF Disability Access Position Statement

Representation ID:

MCA/CMM9/R/1/CMM1249

Organisation/ person making representation:

[Redacted], Ramblers Association

Route section(s) specific to this representation:

CMM-9-S002

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Map CMM 9a and CMM 9b Section CMM-9-S002 and text at paragraph 9.2.13 We note the reference in this paragraph to “pheasant shooting” and the interruption of public access for “short periods” You have given no definition of “short periods”. Ramblers take the view that any interruption should be for no more than a few minutes at a time. We cannot accept closure for a complete day, even if such was possible. Section CMM-9-S002 is some 3 km in length and there is no obvious or convenient alternative route. The new route and the existing South West Coast Path at this location is a public footpath and as such cannot be closed by a directive under Section 24 of the CROW Act 2000, even if such a directive was contemplated. Ramblers welcome such directive not being proposed.

Natural England’s comments

It is highly unlikely that there would ever be a need to interrupt public access along route section CMM-9-S002. If needed it would only be for a few minutes at a time. There are no proposals to consider a direction to exclude or restrict access. When a shoot is planned in the vicinity of the path, signs are used asking the public for their cooperation, reminding them to keep their dogs under effective control in the period immediately before and during a shoot.

We are following the existing South West Coast Path along public rights of way and are we are continuing with an existing arrangement.

Relevant appended documents (see section 5):

N/A

Other representations

Representation ID:

MCA/CMM9/R/2/CMM1524

Organisation/ person making representation:

[Redacted], North Devon Coast AONB

Name of site:

Farmland to the landward of the coast path between Windbury Hillfort and the cliff above Blue Mellem

Report map reference:

CMM 9d Mouthmill to Kite Rock

CMM 9e Kite Rock to Blue Mellem

CMM9f Blue Mellem to East Titchberry Cliff

Route sections on or adjacent to the land:

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

This farmland has been identified as potential coastal margin landward of the trail. This land is essentially enclosed farmland, and is used for both stock and arable crops.

This is especially the case around Beckland Farm from CMM 9-SO22FP and Exmansworthy Farm (permissive access to the coast near Little Chapman Rock) Most of these coastal fields traditionally have an arable crop or short term ley on them and may be considered unsuitable for public open access. They are however, within the ownership of National Trust but the land is tenanted to two large dairy farms.

Natural England's comment:

The extent of the landward coastal margin has been agreed by the landowners – the National Trust. Any land within landward coastal margin that is ploughed/cultivated for the purpose of planting or sowing crops would be excepted from coastal access rights.

Relevant appended documents (see section 5):

N/A

Representation ID:

MCA/CMM9/R/3/CMM1527

Organisation/ person making representation:

[Redacted] Disabled Ramblers

Name of site:

Report map reference:

1. Map CMM 9a Barton Wood to The Hobby

2. Map CMM 9b The Hobby to Wood Rock
3. Map CMM 9c Wood Rock to Mouth Mill
4. Map CMM 9d Mouth Mill to Kite Rock
5. Map CMM 9e Kite Rock to Blue Mellem
6. Map CMM 9f Blue Mellem to East Titchberry Cliff
7. Map CMM 9g East Titchberry Cliff to Hartland Point

Route sections on or adjacent to the land:

Report CMM 9: All route sections in general

Specific comments on the following maps:- Maps 9e, 9f, and 9g

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

There is a 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 right of access that walkers do, so Natural England should ensure that any existing or new infrastructure along the Coast Path does not present a barrier to their ability to progress along the Coast Path. Natural terrain will, in places, prevent access and this is unavoidable, however man-made infrastructure can be changed. Unlike in other parts of England, the proposals for Devon and Cornwall, and therefore for Report CMM 9: Barton Wood to Hartland Point, do not indicate what existing structures Natural England proposes to retain, or where they are. This lack of information means that Disabled Ramblers can only able comment on these proposals in a very general way with regard to existing man-made structures. It is anticipated that there are instances of man-made barriers that bar legitimate access to users of mobility vehicles. In urban areas it is important that there are dropped kerbs along the route of Coast Path.

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.

Comments on specific infrastructure and route sections.

The terrain along the route of the Coast Path and the coastal margin landward of the trail on Maps 9e, 9f and 9g is suitable for users of all-terrain mobility vehicles and allows for a significant ramble. It is therefore encouraging that the existing step stiles will be replaced, but the new structures should be suitable for use by all-terrain mobility vehicles (see attached *Disabled Ramblers Notes on Infrastructure*).

The two National Trust car parks at East Titchberry Farm and Exmansworthy are the access points for those with limited mobility to reach this part of the Coast Path (because there are

natural barriers at either end of this part of the Coast Path which prevent mobility vehicles from going further). Disabled Ramblers request that Natural England work with National Trust to ensure that all infrastructure that is not suitable for users of all-terrain mobility vehicles (see attached *Disabled Ramblers Notes on Infrastructure* and which is situated

- along the paths from the two car parks to the Coast Path
- along the Coast Path trail
- within the coastal margin landward of the trail

is replaced with suitable infrastructure. For example the large field gate on the National Trust circular route inland of the coast path which is a barrier to access for users of mobility vehicles should be replaced with a more suitable structure that will provide for the needs of both horse riders and mobility vehicles – possibly a smaller field gate for horses with a pedestrian gate beside it for mobility vehicles. It is encouraging that any new access furniture will be fully compliant with BS5709:18.

Disability access issues were also raised by the Devon Countryside Access Forum MCA/CMM Stretch/R/3/CMM1324

Natural England's comment:

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar all-terrain vehicles difficult if not impossible. In some of our reports for the Combe Martin to Marsland Mouth stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified (including those relating to the creation of a significant 'circular ramble' for those using mobility scooters between route sections CMM-9-S026 and CMM-9-S033), we will discuss their suggestions with the access authority and the landowners, including the National Trust.

Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Both we and the access authority agree in principle that gates should conform to the most recent British Standard and any new access furniture detailed in the Combe Martin to Marsland Mouth Coastal Access reports will be installed in compliance with BS 5709:2018, the British Standard for Gaps, Gates and Stiles.

Because of current access restrictions, it may not be possible to agree specific new projects until the establishment phase of the process.

Relevant appended documents (see Section 5):

5D - MCA/CMM9/R/3/CMM1527 - Disabled Ramblers – Notes on infrastructure

5I - MCA/CMM9/R/3/CMM1527 - Disabled Ramblers – specific comments on sections

Length Report CMM10

Full representations

Representation ID:

MCA/CMM Stretch/R/1/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Complex roll-back

The Devon Countryside Access Forum notes the significant number of more complex rollback locations which have been identified in the reports. There is concern that there is no limit to how far inland roll-back might apply, given excepted land and environmental obligations. The Forum agrees that simple roll-back should take place. The Devon Countryside Access Forum advises that it does not seem appropriate for roll-back to take place in the complex situations cited in the reports. Roll-back does not provide any statutory process for consultation, and could impact on landowners hitherto unaware that their land could be affected.

The Devon Countryside Access Forum advises that it would be more appropriate to publish variation reports in these instances to formally allow landowners and others, such as the DCAF, to make objection or representation.

Natural England's comments

In our published Overview document we explain that ordinarily, where roll-back has been proposed and becomes necessary, we would expect the trail to be adjusted to follow the current feature (for example, the cliff edge or top of foreshore). Where we foresee that local circumstances will require more detailed consideration, we provided further information about the situation in the relevant report. We call this 'complex rollback'; such situations may include where the trail can't roll back in the normal way because of an obstruction, excepted land or because of environmental considerations.

We have taken and will continue to take all reasonable steps to discuss implications and options with all parties likely to be affected by such changes, both during the initial planning work that preceded the writing of the reports for each length, and during any future work to plan and implement a 'rolled back' route.

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

Representation ID:

MCA/CMM Stretch/R/2/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full**Signage and way-marking**

The Devon Countryside Access Forum expects, as part of the implementation process, that signage and way-marking will be clear, especially at points of decision where paths may go in different directions. Signage should reflect the nature of the path and be appropriate to the landscape to avoid sign clutter or urbanisation. Users should be encouraged to have maps available, especially away from residential areas.

Natural England's comments

As part of the implementation process Natural England, together with the access authority, will ensure that signage is clear and appropriate, particularly at junctions.

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

Representation ID:

MCA/CMM Stretch/R/3/CMM1324

Organisation/ person making representation:

[Redacted], Devon Countryside Access Forum

Route section(s) specific to this representation:

Whole length

Other reports within stretch to which this representation also relates:

N/A

Representation in full**Disability access**

The Devon Countryside Access Forum is aware that many sections of the coast path include man-made obstacles such as path furniture (stiles, steps and gate design), narrow chicanes or lack of drop kerbs which make access difficult for people with limited mobility. There are other instances where upgrades to path surface, width or drainage could make access easier. The Forum advises that Natural England considers this in implementing the England Coast Path in Devon and works with land managers and other partners to secure improvements. It may be possible to identify particular stretches of path where the gains to access would be most beneficial. While the Forum recognises that issues of topography might make accessing some areas challenging, there are often many simple actions which can be taken to improve access for disabled people.

To give an example, the kerb in this photo* (on the existing South West Coast Path) makes access through the gate difficult but could be replaced at modest cost with a ramp.

*See relevant appended document referred to below.

A number of specific issues were raised by the Disabled Ramblers representation (MCA/CMM1/R/6/CMM1527). These are discussed in more detail in Natural England's comments on their representation.

Natural England's comments

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar vehicles difficult if not impossible. In some of our reports for the Combe Martin to Marsland Mouth stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified, we will discuss their suggestions with the access authority and the landowners. Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Because of current access restrictions, it may not be possible to agree specific new projects until the establishment phase of the process.

Relevant appended documents (see section 5):

*5A - MCA/CMM Stretch/R/3/CMM1324 - Photo accompanying Devon Countryside Access Forum (DCAF) representation

5B – MCA/CMM Stretch/R/3/CMM1324 - DCAF Disability Access Position Statement

Representation ID:

MCA/CMM10/R/2/CMM1324

Organisation/ person making representation:

[Redacted], Devon Coastal Access Forum

Route section(s) specific to this representation:

CMM-10-S021

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Dyer's Lookout

The problems with erosion are critical at this point and the Devon Countryside Access Forum supports a less steep route, CMM-10-S021 that zigzags slightly inland.

Natural England's comments

We welcome the positive engagement from Devon Countryside Access Forum during the development of our proposals and the supportive comments expressed in their representation.

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

Other representations

Representation ID:

MCA/CMM10/R/1/CMM1522

Organisation/ person making representation:

[Redacted], South West Coast Path Association

Name of site:

Hartland Quay

Report map reference:

Map CMM 10c

Route sections on or adjacent to the land:

Route sections CMM-10-S025 and CMM-10-S026

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

The proposal is for the route to pass behind the Hartland Quay Hotel, rather than actually passing it as at present. It is acknowledged that the access road is narrow, but any traffic is usually travelling slowly, and such traffic is not great in number, many visitors using the higher car parks. It is also acknowledged that the higher route may have better sea views. However, most walkers here will wish to visit the hotel and its facilities, the only ones for several miles along the coast in both directions. On balance, therefore, it might be better for the National Trail to recognise this and retain the current route. If the view is that the higher route should be used for the National Trail, it will be important that signs advising walkers of the facilities at the hotel are included as part of the scheme at the two ends of these Route Sections.

This point is also raised by [Redacted] in representation MCA/CMM10/R/3CMM1544

Natural England's comment:

We welcome the positive engagement from the South West Coast Path association during the development of our proposals.

Currently at Hartland Quay, walkers are given the option of a route through the middle car park or down the road to the hotel and lower car park. The lower route is sign-posted 'Amenities' and the upper route is signed with the National Trail acorn symbol. Other signage in the immediate vicinity is confusing with some saying 'Coast Path' with no acorn symbol and others 'Coast Path' with the acorn.

The lower route (from the north) goes down the steep access road to the hotel and lower car park and then up a steep set of steps before re-joining the 'upper' route by the middle car park.

Natural England consider the upper route to be safer and more convenient for walkers.

Signage in the area is not clear and proposed new signage at the junctions of route sections CMM-10-S024/CMM-10-S025 and CMM-10-S026/CMM-10-S027 will make it clear that there are amenities for walkers at the hotel. The currently confusing signage will be tidied up.

The lower route will remain open (as a public footpath) and walkers will still be able to access the beach as they do now.

Relevant appended documents (see Section 5):

N/A

Representation ID:

MCA/CMM10/R/3CMM1544

Organisation/ person making representation:

[Redacted] and [redacted]

Name of site:

Weekaborough Farm to South Hole (CMM 10e)
Hartland Quay (CMM 10c) Dyer's Lookout (CMM 10b)
Embury Beacon (CMM 10f)

Report map reference:

Map numbers CMM 10b, CMM 10c, CMM 10e, CMM10f

Route sections on or adjacent to the land:

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

Introduction/General comments

The introductory overview states that these proposals are designed to improve public access to the coast and state that it is a significant opportunity to do so. [Redacted] conclude that it is a huge opportunity missed. Their comments are prompted by the section they know well, but strongly suspect their general comments apply to the entire South West Coast Path.

They say that as a general rule the Natural England proposals repeatedly moved the coast path further from the coast and greatly denigrated the walker's experience of the path.

Comments about specific locations

1) Weekaborough Farm to South Hole

The path (unnecessarily) leaves the coast at Weekaborough Farm and follows the road south before re-joining near South Hole Farm. The representation states that there is plenty of available access land between the road and the cliff edge along this whole section and that walking along a road is not only dangerous (far more dangerous than walking along a cliff edge), is boring, provides hardly any view (access) of the coast and is totally contradictory to the purpose of the path – walking along the coast.

2) Hartland Quay

The existing path runs down a small private road to afford the most glorious views, on a par with any views to be seen anywhere on the whole of the coast path. Once down at the bottom of the road there are continuing wonderful views in both directions all along the coast and importantly access to the beach. The beach is a fundamental part of the coast path and people want to be able to access it. On a hot day after walking 10 miles many people relish the chance to go down for a swim. Furthermore, there is also a pub and hotel providing one of the few opportunities for refreshment and accommodation along this whole section of coastline. The representation states

that taking the upper route (via the middle car park) is depriving people access to the pub/hotel/beach.

This point is also raised in the SWCPA representation MCA/CMM10/R/1/CMM1522

3) Dyers Lookout

The path is being moved inland at Dyers lookout. The representation accepts that the move away from the sea is not large, it is none the less still in the wrong direction. If the existing coast path is very worn it could be improved, alternatively the path could be moved further seaward using an existing path which runs around the headland at a lower level.

4) Embury Beacon

Embury Beacon is one of the highlights of this section of the path and people like to enjoy a picnic at this high view point, enjoying not only the view but also feeling the evocative, spiritual connection with our ancestors who actually sat and worked in this very spot thousands of years ago.

The need to protect the site is understood, but this is no greater than the need to protect thousands of other heritage sites that are all freely open to the public all around Devon and Cornwall. Most of these antiquities are far more vulnerable than Embury Beacon. The representation states that walkers on the coast path would be prevented from accessing the coast at this much less vulnerable site. [Redacted] walk through Embury Beacon regularly and cannot see evidence of excessive wear from the footfall of walkers, probably because there are many ways to enter/cross the area. They cannot see any possible justification for banning the public from enjoying their history.

Natural England's comment:

Introduction/General Comments

There are a few places where the proposed England Coast Path has been moved a short distance inland from the current South West Coast Path. The reasons for this range from protection of Scheduled Monuments and wildlife habitat to disappearance of the original trail through erosion/cliff fall events. Where the route has been moved further in land, detailed reasons are given in the Length reports.

There are also locations where the route has been moved much closer to the sea (for example at Braunton Burrows and at Watertown).

Comments about specific locations

1) Weekaborough Farm to South Hole

Our proposed route is along the existing South West Path which is on the road between Weekaborough and South Hole.

Creating a route through the Open Access land seaward of the road between Weekaborough Farm and South Hole is not possible due to the unstable nature of the coastal slope and landslips in a number of locations. The majority of the land seaward of the trail at this location is currently 'Open Access'. It will all become Coastal Margin and therefore accessible to walkers. The road between Hardisworthy/Elmcott and South Hole is very quiet and has little traffic. The majority of route section CMM-10-S043 has wide grassy verges. The route was walked by Natural England in June 2019 and no vehicles were seen in 1½ hours. The access authority support the route being on the road at this location.

2) Hartland Quay

Currently at Hartland Quay, walkers are given the option of a route through the middle car park or down the road to the hotel and lower car park. The lower route is sign-posted 'Amenities' and the upper route is signed with the National Trail acorn symbol. Other signage in the immediate vicinity is confusing with some saying 'Coast Path' with no acorn symbol and others 'Coast Path' with the acorn.

The lower route (from the north) goes down the steep access road to the hotel and lower car park and then up a steep set of steps before re-joining the 'upper' route by the middle car park.

Natural England consider the upper route to be safer and more convenient for walkers. Signage in the area is not clear and proposed new signage at the junctions of route sections CMM-10-S024/CMM-10-S025 and CMM-10-S026/CMM-10-S027 will make it clear that there are amenities for walkers at the hotel. The currently confusing signage will be tidied up.

The lower route will remain open (as a public footpath) and walkers will still be able to access the beach as they do now.

3) Dyers Lookout

The seaward PROW has fallen into the sea in some places. The existing SWCP is steep and seriously eroding in places. There will still be great views from the proposed new path. The new zigzag slightly more inland route at Dyer' Lookout is based on advice from the access authority as the best location to achieve the aims of reducing erosion caused by walkers. Land seaward of the route will be 'Coastal Margin' and therefore subject to coastal access rights. The Devon Coastal Access Forum supports this new route location.

4) Embury Beacon

The current route of the SWCP runs on the seaward edge of the Beacon and it has fallen into the sea in a number of places. There is no space for a seaward route so the path has therefore been aligned on the immediate landward edge of the Beacon thus avoiding erosion over the scheduled monument.

Both the site owners (National Trust) and Historic England were in favour of taking the England Coast Path off Embury Beacon – principally to reduce erosion

Land seaward of the route is in Coastal Margin and is therefore subject to Coastal Access rights. Natural England are not stopping walkers going to Embury Beacon. In addition Natural England are proposing to erect information boards at appropriate locations in the vicinity of Embury Beacon.

Relevant appended documents (see Section 5):

N/A

Representation ID:

MCA/CMM10/R/4/CMM1527

Organisation/ person making representation:

[Redacted] Disabled Ramblers

Name of site:

Report map reference:

- Map CMM 10a Hartland Point to Smoothlands
- Map CMM 10b Smoothlands to Warren Beach
- Map CMM 10c Warren Beach to Swansford Hill
- Map CMM 10d Swansford Hill to Elmscott Gutter
- Map CMM 10e Elmscott Gutter to Broadbench Cove
- Map CMM 10f Broadbench Cove to Chiselridge Beach
- Map CMM 10g Chiselridge Beach to Marsland Mouth

Route sections on or adjacent to the land:

Route section CMM-10-S021, Dyer's Lookout

Route section CMM-10-S051, Embury Beacon

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

There is a 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 right of access that walkers do, so Natural England should ensure that any existing or new infrastructure along the Coast Path does not present a barrier to their ability to progress along the Coast Path. Natural terrain will, in places, prevent access and this is unavoidable, however man-made infrastructure can be changed. Unlike in other parts of England, the proposals for Devon and Cornwall, and therefore for Report CMM 10: Hartland Point to Marsland Mouth, do not indicate what existing structures Natural England proposes to retain, or where they are. This lack of information means that Disabled Ramblers can only able comment on these proposals in a very general way with regard to existing man-made structures. It is anticipated that there are instances of man-made barriers that bar legitimate access to users of mobility vehicles. In urban areas it is important that there are dropped kerbs along the route of Coast Path.

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 also made detailed comments on existing trail infrastructure causing specific access issues at various route sections.

Comment 1

Dyer's Lookout CMM-10-S021

Disabled Ramblers requests that the zigzagged path should

- be wide enough for large mobility vehicles
- At each point of the zigzag, have sufficient space for a large mobility vehicle to turn

Comment 2

Embury Beacon CMM-10-S051

Disabled Ramblers requests that

- The new pedestrian gate should be suitable for use by users of mobility vehicles (see attached document *Disabled Ramblers Notes on Infrastructure*.)
- The two existing gates in the vicinity are not suitable for use by users of mobility vehicles and should be replaced

Natural England's comment:

After the publication of our proposals we had discussions with the Disabled Ramblers who raised issues at a number of locations in relation to steps, gates (either being too narrow or only opening in one direction) and other artificial obstructions that make access by buggy, *Tramper* and other similar all-terrain vehicles difficult if not impossible. In some of our reports for the Combe Martin to Marsland Mouth stretch we have identified locations where we have agreed to replace or install new infrastructure to improve access.

Where the Disabled Ramblers have identified additional locations where they consider accessibility can be improved/modified (including those relating to the zig-zag path at Dyer's Lookout - route section CMM-10-S021 and the gates at Embury Beacon – route sections CMM-10-S049 to CMM-10-S051), we will discuss their suggestions with the access authority and the landowners, including the National Trust.

Should these suggestions be workable/appropriate, we would agree who would fund such work (whether it is the access authority or Natural England). A separate central government contribution is made annually to the South West Coast Path National Trail Partnership which is available to help with the costs of replacing infrastructure such as gates if the access authority agrees they are necessary.

Both we and the access authority agree in principle that gates should conform to the most recent British Standard and any new access furniture detailed in the Combe Martin to Marsland Mouth Coastal Access reports will be installed in compliance with BS 5709:2018, the British Standard for Gaps, Gates and Stiles.

Because of current access restrictions, it may not be possible to agree specific new projects until the establishment phase of the process.

Relevant appended documents (see Section 5):

5D - MCA/CMM10/R/4/CMM1527 Disabled Ramblers – Notes on infrastructure

5J - MCA/CMM10/R/4/CMM1527 Disabled Ramblers – specific comments on sections

5. Supporting documents

5A - MCA/CMM Stretch/R/3/CMM1324 - Photo accompanying DCAF representation



5B - MCA/CMM Stretch/R/3/CMM1324 - DCAF Disability Access Position Statement



Devon Countryside Access Forum

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Devon Countryside Access Forum

Physical Disability Access Position Statement

The Devon Countryside Access Forum recognises that everyone, whether residents or visitors, should be able to enjoy recreation in Devon's natural environment.

The issue

This Position Statement sets out recommendations for improving access to the countryside for people with limited mobility, including on Public Rights of Way and cycle/multi-use trails, and points readers to more detailed information.

Although this Statement focuses particularly on physical disabilities, it is worth noting that limited mobility affects a range of people, including parents with children in buggies; elderly or frail people, who might use an electric mobility scooter or wheelchair; and people with walking aids. Improving access for wheelchairs and large off road electric mobility scooters can improve access for all.

Research shows that people with limited mobility are less likely to say they can access 'green spaces' and are less likely to visit the countryside. This is because they experience barriers that can be impossible to navigate. Barriers can include:

- stiles;
- steps;
- narrow gates, entrances, paths and exits;
- difficult or high handles and latches on gates;
- logs or earth mounds;
- steep gradients and cross-gradients; and overgrown vegetation.

The DCAF recognises that there are some routes that cannot be made accessible because of flights of steps or unavoidably narrow sections. However, many barriers can be removed at relatively low cost, opening up significant areas of countryside to more disabled people. The aim should be to achieve the least restrictive option.

Disabled people are now benefiting from ongoing technological improvements in mobility aids. Now, electric and all terrain scooters/buggies, such as the off-road Trampler, can cope with more challenging gradients (25%) and cross gradients as well as having good ground clearance. All terrain type scooters are quite capable of going across grass fields and open moorland. Such off road scooters can even manage distances of 20 to 40 miles. A modest improvement to a gate may open up more extensive areas for access.



The Devon Countryside Access Forum is a local access forum. It is required, in accordance with Sections 94 and 95 of the Countryside and Rights of Way (CRoW) Act 2000, to provide advice as to the improvement of public access to land for the purposes of open-air recreation and enjoyment.

Access managers often under-estimate the capability of this new generation of off-road mobility scooters and may think access cannot be improved if routes are not suitable for wheelchairs, whereas it is highly likely that a Trampler off road scooter could cope adequately.

Making improvements

Major modifications to routes using very specific criteria are often inappropriate, especially in rural areas, or very expensive but relatively minor changes can often result in a much more accessible and enjoyable route, particularly for people with all-terrain scooters.

Improvements must be agreed with landowners and should consider how disabled people might be able to access the route while maintaining necessary measures to control farm animals and any vehicles. In some instances changes will not be possible. Historic or locally important structures should be respected.

Some possible improvements include:

- Replacing stiles and kissing gates with 1.5 m wide gates with good latches and trombone handles. Where self-closing gates are required a two-way gate is preferable. Kissing gates that can be operated by radar keys may be an option in some locations. (e.g. National Trust Parke estate and Fremington Quay nature reserve). Latches are often over-looked but can ensure gates can be easily opened and closed. They should be positioned where they can be reached and in good condition. Long handles which can be reached at different heights are useful to open gates.

- Ensuring the path width and surface are suitable for wheelchairs, buggies and trampers helps many people. This does not mean that a route requires a road surface – minimising puddles, roots and ruts may be all that is needed. Many disabled people still want a countryside experience.
- Ramps rather than steps on approaches to bridges would greatly assist those with disabilities. Where steps are unavoidable, rest or landing areas should be included or there should be signposting to an alternative reasonable route.
- DCAF advises site managers to explore options for facilitating access for Trampler all terrain mobility scooters or making these available for hire, as has been successfully developed by Countryside Mobility South West.
- Routes for cyclists should take into account reclining bikes, trikes and modified bikes as well as Trampler type mobility scooters. These can be longer, lower or wider than a standard bike when navigating a gate or turning space.

Planning for better access

The Forum advises that improvements to Public Rights of Way should incorporate the highest possible access standards from the outset, and that managers should regularly consider potential enhancements. For example, Parish Councils may be planning improvements to Public Rights of Way through Neighbourhood Plans and should consult disabled people on changes. This will ensure costly mistakes that inhibit access are avoided and that people are informed where it is not possible to make an adjustment and improvement. In planning or designing *new* routes the above recommendations should be considered from the beginning to achieve the highest standards possible. A number of organisations have good practice guides to ensure disability access standards can be implemented.

It is also worth noting that improving access to the countryside isn't necessarily limited to improving paths and gateways. People with limited mobility may have other needs too. There are additional aspects to consider and these include:

- Connectivity (access to the site via accessible public transport, disabled parking bays or safe paths).
- Rest (stopping off points such as picnic tables, pubs, cafes and wheelchair (or mobility scooter) accessible toilets).
- Information (providing clear, easy to read information about the route or site so that people can plan their visit with confidence and consider making information usable by visually sighted and/or Deaf persons)
- Sensory enhancements such as scented plants for visually impaired people. Also, suitable lighting and clear edges to paths in urban areas.

Legislation

Under the Equality Act 2010, Public Authorities (including County, District, Town and Parish Councils) have a pro-active legal duty to advance equality for disabled people. This includes meeting disabled people's needs. The Act also places a requirement on providers of services to the public to ensure people are not unlawfully discriminated against and that reasonable adjustments are anticipated and made for disabled people. Landowners who have public access or public rights of way across their land are not providers of public services, and therefore cannot be obliged under the Act to make reasonable adjustments, for example by changing a stile to a gate. Landowners who provide permissive access must comply with the Equality Act by considering what reasonable adjustments can be made for disabled people. However, this does not oblige them to put in place anything that would be an unreasonable cost, ineffective or impractical. More information:

<https://www.equalityhumanrights.com/en>

<http://www.legislation.gov.uk/ukpga/2010/15/contents>

<https://new.devon.gov.uk/equality/policy-and-legislation/equality-legislation>

The Department of Transport legislation states that Class 3 mobility scooters must have a maximum speed of 4 mph on pavements and 8 mph on roads, a width of 85 cm and an unladen weight of 150 kg. This class includes Tramper mobility scooters and the TGA 3 wheel Supersport.

<https://www.gov.uk/mobility-scooters-and-powered-wheelchairs-rules/rules-for-class-3invalidcarriages>

Best Practice

For photos showing good practice and details of wheelchair and mobility scooter specifications see the DCAF website www.devon.gov.uk/dcaf

For more comprehensive information on standards, particularly when establishing a new route, see:

- The Fieldfare Trust – www.fieldfare.org.uk <http://www.fieldfare.org.uk/countryside-forall/countryside-for-all-good-practice-guide/> This site includes information on the BT Countryside for All project.
- Disabled Ramblers UK - <http://disabledramblers.co.uk/>
The Disabled Ramblers helps mobility-challenged people get back out into the countryside. Disabled ramblers have several categories of footpath from level 1 for manual wheelchairs to level 3 for off road scooters. Full details are on the website.
- Natural England's Trial of self-closing bridlegates
<http://publications.naturalengland.org.uk/publication/4580441024102400>
The summary and conclusions make recommendations for disability access following a trial involving walkers, horse-riders, cyclists, disabled users and landowners.
- Sensory Trust information fact sheets -
<http://www.sensorytrust.org.uk/information/factsheets/>

For more general information on current initiatives in Devon which benefit disability access see:

- Countryside Mobility SW (tramper buggy hire project) <http://www.countrysidemobility.org/>
- Living Options Devon Heritage Ability project - www.heritageability.org

The Devon Countryside Access Forum is a statutory local access forum set up under the Countryside and Rights of Way Act 2000. Its members are volunteers, appointed by Devon County Council, to provide independent advice on “the improvement of public access to land for the purposes of open-air recreation and enjoyment”. The members represent the interests of landowners/land managers, access users and other interests such as tourism and conservation.

5C - MCA/CMM1/R/2/CMM1542 - No access to former coast path

At CMM-1-SO11RD the Coast Path takes walkers away from the former coast path, up an incline and onto the busy A399 road which has a narrow footpath alongside a busy main road with a 60 mph speed limit. See Fig 1. This is now referred to as the by-pass and was opened

in June 1992. The route re-joins the coast path at the bottom of Barton Hill near CMM-1-SO15RD.

When I moved to Combe Martin the old path extending down Newberry Close to Barton Lane, was open to walkers and I believe it used to form part of the South West Coast Path. Local long term residents tell me that the route used to be the main road from Combe Martin to Ilfracombe, and is shown as such on a 1946 map of the area. The current signs prohibiting access were put up in about 2010 – see fig 2.

North Devon Council retrospectively awarded planning permission for a garage to be erected in April 2016 (NDCC Application 60766). This was awarded to the owners of the house named Oakland on Newberry Close. The finished building looks nothing like the proposal and is in a different location to the application, which seems a little bizarre. See Fig 3, 4 and 5. According to the Land Registry Title Deed, the land does not form part of the property and the coast path is shown as clear. The garage completely blocks the coast road.

The notices on the Barton Lane side of the path declare “access to Green Leas only” see fig 6, 7 and 8. According to the Land Registry Title Deed, the coast path does not form part of their property and is shown as clear. In December 2019, the owners of Green Leas applied for and were granted planning permission to demolish the existing house and rebuilt it further north ie. Coast side (NDCC Planning application 70384). On the plans for the new house the coast road is shown intact.

I have written to the Berrynarbor Parish Council about the access restriction and the clerk has referred my query to the Public Right of Way Officer at North Devon Council. She also said that “parishioners had raised concerns about the safety of a footpath in the Barton Lane area that leads straight out onto the main road.” This is part of the route on the Natural England map. In January 2020 North Devon Council issued notices to upgrade this section of the footpath into a bridleway.

The Devon County Council Public Rights of Way Map does not show any indication that this stretch of path is prohibited to the public. See Fig 10

The route proposed on your map is approx. 480 metres from CMM-1-SO11RD to the point where it intersects with the old coast road. The old route is approx. 350 meters shorter and had attractive coastal views.

If under the Marine and Coastal Access Act 2009 you are improving the England Coast Path, I urge you to look at this short stretch of coast. If the original coast path could be re-instated, it would be a great benefit to all walkers and visitors.



Fig 1 - A399 Current 'Coast' Path



Fig 2 – Sign preventing access from Newberry Close



Fig 3 Existing Garage – via Goole Maps – showing old coast road / Newberry Close as a base.

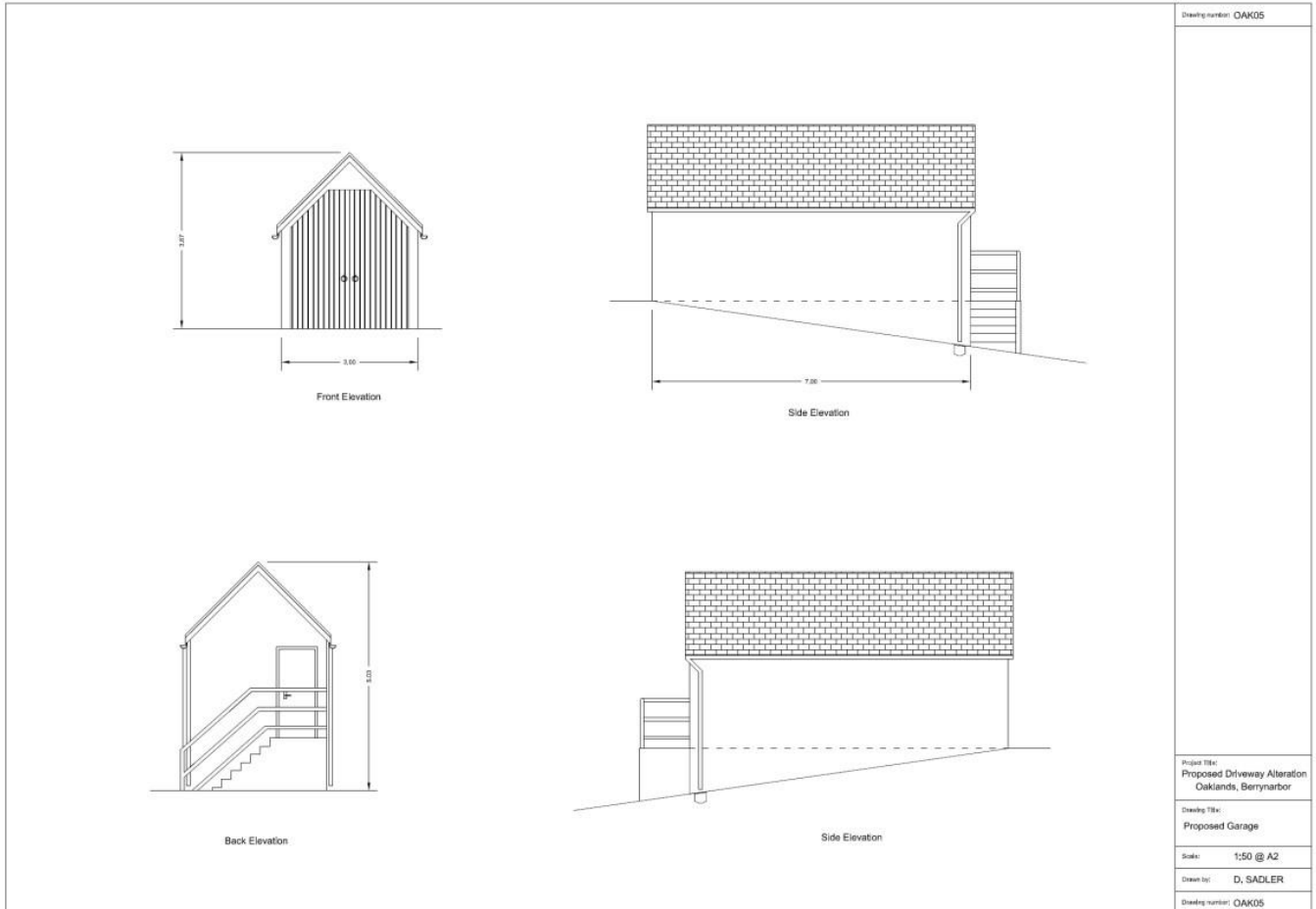


Fig 4 Approved Garage

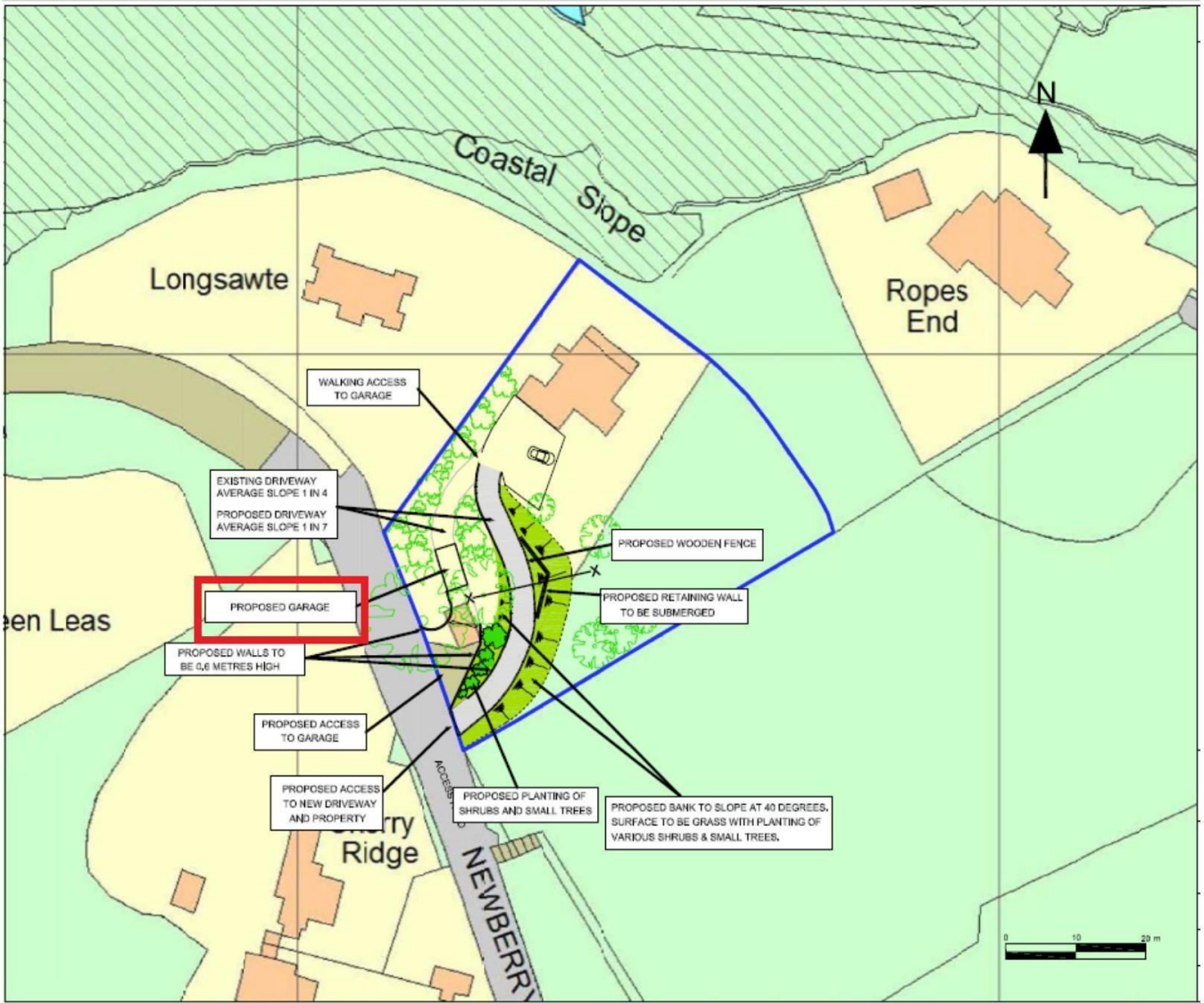


Fig 5 Approved location of Garage



Fig 6 – Sign Preventing Access from Barton Hill



Fig 7 – Sign denying access to coast path



Fig 8 – Handmade coast path diversion sign.

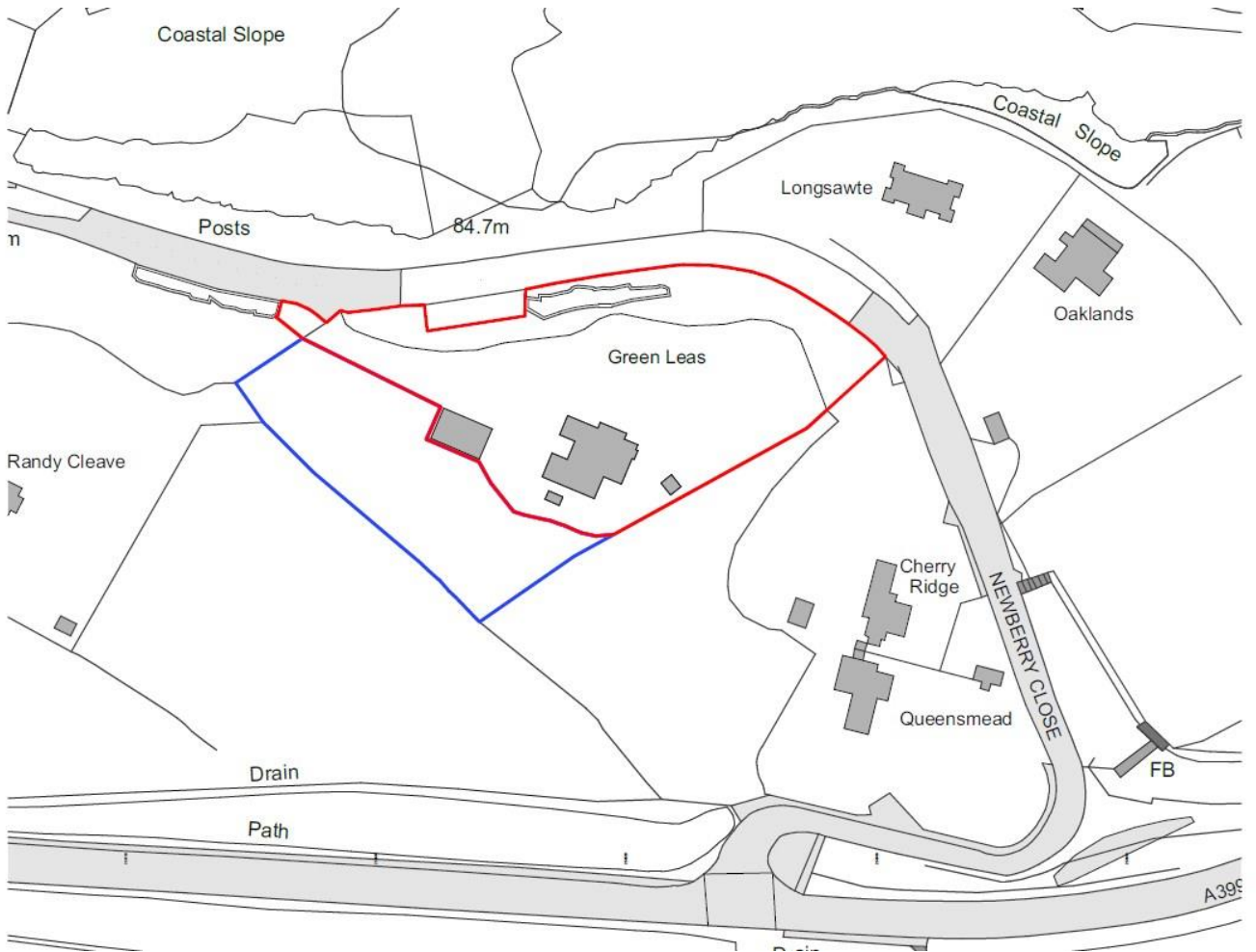


Fig 9 Location Plan with Planning Application No 70384, showing coast path.

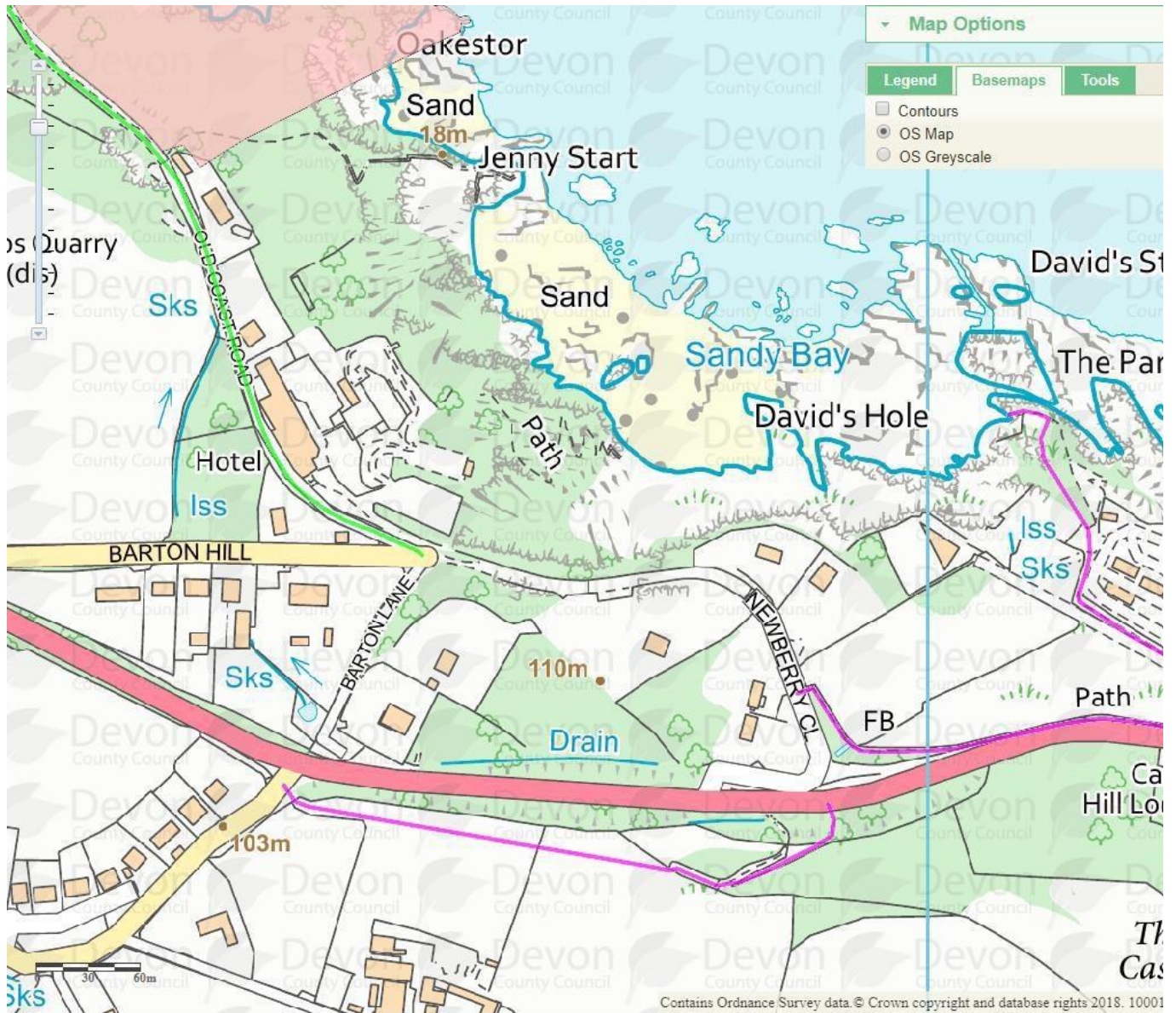


Fig 10 Devon County Council Rights of Way Map

5D - MCA/CMM1/R/6/CMM1527 – 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/easylatch-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, twoway 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

5E - MCA/CMM2/R/4/CMM1527 – Disabled Ramblers – specific comments on various route sections

Comment 1

Map CMM 2a route sections CMM-2-S001 to CMM-2-S009, Torrs Park and Seven Hills. The coastal margin landward of the Coast Path trail at Torrs Park and Seven Hills is suitable terrain for users of all-terrain mobility vehicles. This area can be reached from the point where CMM-1-S080 joins CMM-2-S001, however there are 4 shallow steps:



Potentially the area of the steps could be 'sloped' to allow access to users of all-terrain mobility vehicles to Torrs Park and Seven Hills. Alternatively a diversion could be signed from the Coast Path at this point along the tarmac road/pavement all the way to Langleigh Lane. Within the coastal margin landward of the Coast Path trail, shown on the image at Question 2 of this representation, (and possibly along the Coast Path route itself, where the terrain is suitable) there are places where the infrastructure is not suitable for users of all-terrain mobility vehicles, such as this kissing gate.



Disabled ramblers requests that Natural England

- Decide on the best way to access this area, and install appropriate signage for any diversion.
- Work with National Trust to ensure that unsuitable infrastructure which prevents access to users of mobility vehicles within this area is removed and replaced with appropriate structures

Comment 2

Map CMM 2f Gates at both sides of route sections CMM-2-S036

Where the Coast Path crosses the road at CMM-2-S036 the gates on either side of the road prevent access for those on mobility vehicles.

A. Gate to the road from CMM-2-S036: This is a large field gate, held shut by a 'hook and eye' fastening on the road side which would be impossible to reach from a mobility vehicle from the opposite side. The gate opens into the field and there is an exposed rocky edge stepping up just beyond the gate.



Disabled Ramblers requests that this gate is removed, and a new, suitable, gate is installed that can be used by those on mobility vehicles (preferably a two-way, self-closing pedestrian gate) is repositioned further into the field, across the grassy path (the fencing will need to be adjusted), allowing better alignment of the path to the gate. See attached document *Disabled Ramblers Notes on Infrastructure*.

B. Gate from the road to CMM-2-S037: This is a pedestrian gate, used alongside a field gate. The alignment of the pedestrian gate with the path is very difficult for a user of a mobility

vehicle, and the field gate is too heavy. The pedestrian gate is held shut by a 'hook and eye' fastening on the road side which would be impossible to reach from a mobility vehicle from either side. The gate also appears to have a strong spring closing mechanism attached which is also impossible for a user of a mobility vehicle.



Disabled Ramblers requests that the double gate configuration is changed to improve alignment with the path for mobility vehicle users, and that the pedestrian gate is replaced with a new, suitable, gate that can be used by those on mobility vehicles (preferably a two-way, self-closing pedestrian gate). See attached document *Disabled Ramblers Notes on Infrastructure*

5F - MCA/CMM3/R/7/CMM1527 – Disabled Ramblers – specific comments on various route sections

Comment 1

Maps 3a and 3b route sections CMM-3-S002 to CMM-3-S005 and Marine Drive
Whilst mobility vehicles may access Woolacombe Sand at the northern end, driving on sand saps vehicle batteries and is not recommended over any distance. Furthermore, it is not possible to leave Woolacombe Sand at the southern end at Putsborough.

Disabled Ramblers requests that Natural England

- Sign a diversion through the coastal margin around Marine Drive above Woolacombe Sand, and ensure there is no unsuitable infrastructure that would prevent mobility scooters from progressing along the diversion.

Comment 2

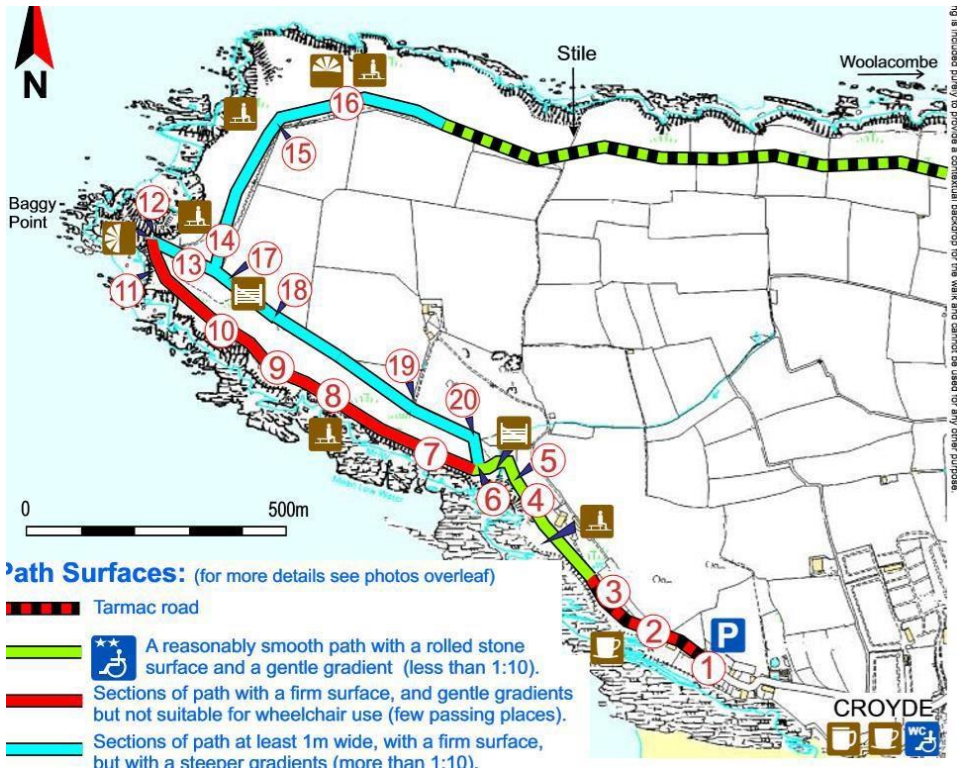
Map 3b route section CMM-3-S009

At the junction between CMM-3-S009 and CMM-3-S010, where the Coast Path leaves the cycle path, there is a stile, field gate and pedestrian gate. The field gate is not suitable for people who use mobility vehicles, and the pedestrian gate only opens one way, making it very difficult for users of mobility vehicles. The pedestrian gate should be replaced with a suitable gate that is two-way and self-closing. (See attached document *Disabled Ramblers Notes on Infrastructure.*)

Comment 3

Map 3d Baggy Point CMM-3-S014 to CMM-3-S019

The South West Coast Path has produced a walk guide to Baggy Point – see map below:



At the junction of route sections CMM-3-S013 and CMM-3-S014 there is a stile which should be replaced with a suitable pedestrian gate to allow access to users of mobility vehicles.



A. Because the lower path, (route section CMM-3-S018) is very narrow in places (in red, between Points 6 and 12 on the SWCP map), the upper route which is within the coastal margin landward of the England Coast Path should be used by mobility vehicles instead.

- Natural England should ensure that warning signs and diversion signs are in place at either end of route section CMM-3-S018.
- Within this area of coastal margin, there is a field gate (Point 17 on the SWCP map) which prevents onward progress for those using mobility vehicles. This field gate should be changed for another more suitable gate, or it might be possible for a pedestrian gate

to be placed alongside a field gate if the path is widened at this point and the ground



levelled.

B. At CMM-3-S019 (Point 5 on the SWCP map) there is a one-way gate with a trombone handle. One-way gates are difficult to manage from a mobility vehicle, so it should be replaced with a two-way self-closing gate.



5G MCA/CMM4/R/9/CMM1527 - Disabled Ramblers – specific comments

Comment 1

Half-way along the section there are two field gates with gaps beside them. In both cases the gaps are just 105 or 106cm wide, but the ground at this point is even, causing mobility vehicles to tip and consequently the gaps are barely wide enough to get through on mobility vehicles. Disabled Ramblers requests that the path at these points should be levelled.

Comment 2

This gate is at the entrance to the Signal Box at Instow. The barrier in the middle of the gate divides the entrance into two narrow gaps of 98 and 94 cm. The gate hinges are broken so the gate can be pulled right back. Disabled Ramblers requests that the gate and barrier are removed and replaced with a suitable structure that will enable mobility vehicles to use this entrance (see attached document *Disabled Ramblers Notes on Infrastructure*).



Comment 3

Map CMM 6i Diversion for route sections CMM-6-S022 and to CMM-6-S0026

Mobility vehicles are unable to leave the cycle path to get onto CMM-6-S023, so a diversion must be signed, and dropped kerbs installed. The diversion is as follows:

- A. Remain on cycle path passing over small bridge into the station
- B. Immediately turn left into and across car park, exiting at the far end
- C. Turn left again and follow pavement round and under the small bridge that was crossed at 'A'.
- D. Cross minor road (needs a dropped kerb on western side)
- E. Cross A386 at pelican crossing on Bideford Long Bridge to return to Coast Path route section CMM-6- S026.



5H MCA/CMM7/R/2/CMM1527 - Disabled Ramblers – specific comments on sections

Comment 1

Map CMM 7a, route section CMM-7-S002 River Bank Long Stay Car park.

River Bank long stay car park is a suitable place to begin a walk along the Coast Path, therefore access between the car park and the Coast Path is important. Dropped kerbs are also important in this urban area. Currently there is only one dropped kerb at the far end of this car park: and there are no signs directing mobility vehicle users to find it, so moving from the car park to the Coast Path is difficult.



There is a metal gate at the end of the car park, but it is difficult to use because it is not aligned with the path, is one-way, does not open wide, and there is no dropped kerb. If this gate does not serve a useful purpose it would be best to remove the gate and have an enlarged gap. If not, it should be replaced with a better positioned gate that is significantly easier to manage by a user of a mobility vehicle. Either way, a dropped kerb should be installed.



Disabled Ramblers requests that

- There is proper provision of dropped kerbs in this car park between the car park and the Coast Path, and between the car park and other local areas.
- The pedestrian gate (see picture above) is replaced and a dropped kerb fitted at this point.

Comment 2

Map 7a, route sections CMM-7-S005 and CMM-7-S012 Narrow footpaths between Council Offices, and Chircombe Lane

Several sections of footpath within these route sections are too narrow for use by mobility vehicles, and as no diversion is possible other than via the A386, mobility vehicles cannot pass under the A39 road to rejoin the coast path at a later point. It is therefore important that signage to this effect is positioned near the Council Offices at CMM-7-S004 and at CMM-7-S019.

Comment 3

Map CMM 7b CMM-7-S022

The large stone boulders in this gully prevent progress along the route by those using mobility scooters. They should be moved.



Comment 4

Map CMM 2b, Route sections CMM-7-S022 to CMM-7-S037

These sections, from Bideford Quay to Appledore, form a superb part of the England Coast Path. It is very scenic with wildlife, shipwrecks, activity on the river to watch and countless photographic opportunities.

Able-bodied walkers can use the path here, but at present the poor path and several barriers mean that those with limited mobility cannot. Even less-able walkers have found that parts of the existing route are too challenging. However there is plenty of scope to make these sections accessible to users of mobility vehicles and easier for less-able or elderly walkers.

Disabled Ramblers request that Natural England make significant improvements to these route sections such as

- improving the path, especially by addressing the camber which can be achieved by cutting into the higher bank beside the path, and addressing exposed tree roots
- preparing short diversions into the landward coastal margin around obstacles such as the set of really high steps (which are a barrier to mobility vehicles and to less able walkers)
- improving boardwalks to enable use by mobility vehicles (eg some are too narrow – just 90cm wide, have no toe board, and do not accommodate the needs of those who use mobility vehicles)
- replacing the pedestrian gates which do not open two-way and where the clear gap is less than 1.1m.

Disabled Ramblers is happy to walk this stretch with Natural England to give advice.

Comment 5

Map CMM 7c Route sections CMM-7-S039 to CMM-7-S053,
Appledore **A. Dropped Kerbs:**

From the car park below CMM-7-S044, all types of mobility vehicle can reach the Coast Path from route section CMM-7-S039 to CMM-7-S047. However there are three places along Irshal Street

(CMM-7-S046) where dropped kerbs need to be provided for pavement scooters to move between the road and the pavement. The first is at the start of CMM-7-S046 where the route drops onto the road:



The next is where the pavement begins, half-way along CMM-7-S046:



And the last one is where the pavement ends by a telephone box:



B. Diversion:

At CMM-7-S047 there are steps along the Coast Path so a diversion must be signed for mobility vehicles to travel up Jubilee Road, and to follow Torridge Road to Watertown to rejoin the Coast Path at CMM-7-S055.

Comment 6

Map CMM 7d route sections CMM-7-S056 to CMM-7-S058 Paragraph 7.2.28 states:

New route section – *a new route at Watertown will take the current South West Coast Path 'high tide route' off a busy road and the 'low tide route' off the mudflats at the Skern (route section CMM-7-S056 and CMM-7-S057, map CMM 7d). This involves reconstructing the wall/bank on the seaward side of the field, new path surfacing and new fencing alongside the trail to separate the path from the landward field. Guide fencing will be used to direct walkers off the mudflats at the same location. Two new pedestrian gates will be required. Any new access furniture will be fully compliant with BS5709:2018, the British Standard for Gaps, Gates and Stiles.*

Disabled Ramblers requests that the new route is sufficiently wide and accessible to those who use large mobility vehicles. Three new pedestrian gates are shown on the proposal maps; these should be two-way, self-closing and suitable for use by riding of these vehicles.

Comment 7

Maps 7d, 7e and 7f: Northam Burrows Country Park and Coastal Margin Landward of the Trail The England Coast Path trail between CMM-7-S059 to CMM-7-S070 is too close to the waterline with heavy sand and shingle. The current SWCP is badly eroded through usage with some man-made obstacles.

Disabled Ramblers members have crossed Northam Burrows, but had to encroach on the golf course. Disabled Ramblers requests that Natural England devise and signpost a suitable route for all-terrain mobility vehicles through the coastal margin landward of the trail. Disabled Ramblers would be willing to walk these sections with Natural England to agree the best route.

5I MCA/CMM9/R/3/CMM1527 - Disabled Ramblers – specific comments on sections

Comment 1

Paragraph 9.2.8 of the Report states:

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

Paragraph 9.2.20 of the Report states:

Improvements to existing route - *the surfaces and access furniture of the existing paths and footways on the proposed route are generally of a suitable standard for the trail, but there one place where a new boardwalk would enhance the convenience of the trail (near Fattacott, map CMM 9e, route section CMM-9-S024). More significant items of establishment works are shown on the relevant maps accompanying this report. Any new access furniture will be fully compliant with BS5709:2018, the British Standard for Gaps, Gates and Stiles*

Disabled Ramblers has concerns with both these statements 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. It is encouraging that any new access furniture will be fully compliant with BS5709:18

Comment 2

Maps 9e, 9f, and

9g Paragraph

9.2.9 states:

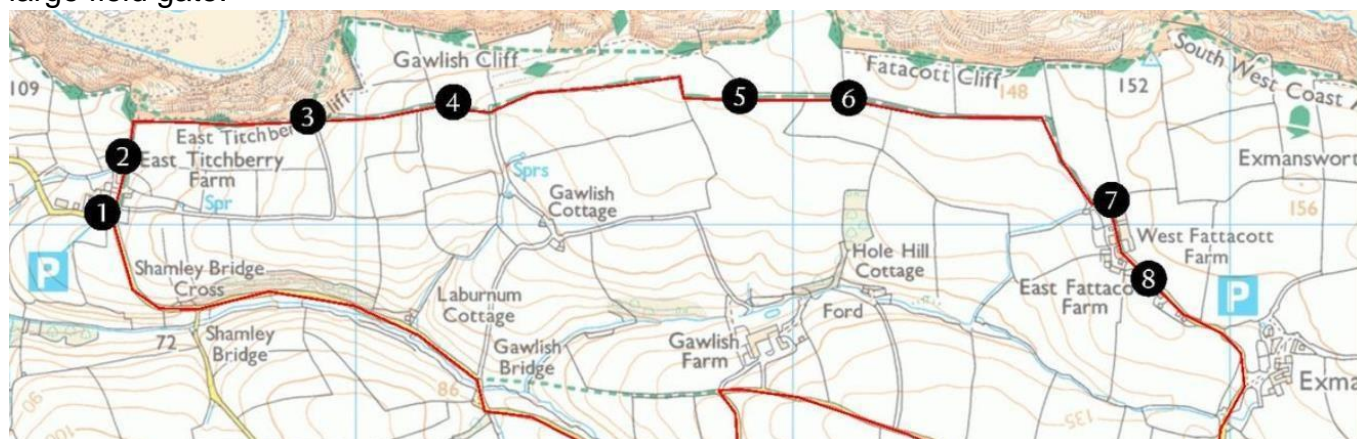
There are places where there are step stiles. Existing stiles between Mouth Mill and East Titchberry will be replaced, so as to make them easier to use. We envisage this happening before the new access rights come into force.

The terrain along the route of the Coast Path and the coastal margin landward of the trail on Maps 9e, 9f and 9g is suitable for users of all-terrain mobility vehicles and allows for a significant ramble. It is therefore encouraging that the existing step stiles will be replaced, but the new structures should be suitable for use by all-terrain mobility vehicles (see attached *Disabled Ramblers Notes on Infrastructure*).

The two National Trust car parks at East Titchberry Farm and Exmansworthy are the access points for those with limited mobility to reach this part of the Coast Path (because there are natural barriers at either end of this part of the Coast Path which prevent mobility vehicles from going further). Disabled Ramblers request that Natural England work with National Trust to ensure that all infrastructure that is not suitable for users of all-terrain mobility vehicles (see attached *Disabled Ramblers Notes on Infrastructure* and which is situated

- along the paths from the two car parks to the Coast Path
- along the Coast Path trail
- within the coastal margin landward of the trail

is replaced with suitable infrastructure. For example, at point 5 on the map below there is a large field gate:





which is a barrier to access for users of mobility vehicles and should be replaced with a more suitable structure that will provide for the needs of both horse riders and mobility vehicles – possible a smaller field gate for horses with a pedestrian gate beside it for mobility

5J - MCA/CMM10/R/4/CMM1527 Disabled Ramblers – specific comments on sections

Comment 1

Dyer's Lookout: route section CMM-10-S021, map CMM 10b Paragraph 10.2.19 of the Report states: *at Dyer's Lookout (route section CMM-10-S021, map CMM 10b) the existing steep and eroding path will be 'zigzagged' to make it easier to walk up/down the slope and reduce further erosion down to the Abbey river crossing. Works will include vegetation clearance, levelling of the path & the use of fencing and cut brash to 'close' the old path.*

Disabled Ramblers requests that the zigzagged path should

- be wide enough for large mobility vehicles
- at each point of the zigzag, have sufficient space for a large mobility vehicle to turn

Comment 2

Map 10f, Embury Beacon

Paragraph 10.2.19 of the Report states:

At Embury Beacon (route section CMM-1-S051, map CMM 10f) the trail will follow the existing walked route in the field landward of the Scheduled Monument. A new pedestrian gate will be required at the junction of trail sections CMM-10-S051 and CMM-10-S05 Disabled Ramblers requests that

- The new pedestrian gate should be suitable for use by users of mobility vehicles (see attached document *Disabled Ramblers Notes on Infrastructure*)
- The existing gates in the vicinity are not suitable for use by users of mobility vehicles and should be replaced