

Coastal Access – Cleveleys to Pier Head, Liverpool



Representations on CPH 4 and CPH6

August 2021

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1. Introduction

This document details representations we have received on the stated coastal access reports. These fall into two categories:

- Representations received from persons or bodies that must be sent in full to the Secretary of State (‘full’ representations, reproduced below); and
- Those which have not come from those persons or bodies whose representations we are required to send in full to the Secretary of State (‘other’ representations, summarised below).

It also sets out any comments that Natural England choose to make in response to these representations.

2. Background

Natural England’s compendium of reports setting out its proposals for improved access to the coast from Cleveleys to Pier Head was submitted to the Secretary of State on 7th October 2020. This began an eight-week period during which representations and objections about each constituent report could be made.

In relation to the reports for CPH4 and CPH6, Natural England received 20 representations, of which 9 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 3 of this document together with Natural England’s comments where relevant.

As required by the legislation this document also summarises and, where relevant, comments on the 11 representations submitted by other individuals or organisations, referred to here as 'other' representations.

Before making a determination in respect of a coastal access report, the Secretary of State must consider all 'full' representations and our summary of 'other' representations, together with Natural England's comments on each.

No further representations were received after the period of eight weeks beginning with the date on which the report was first advertised on Natural England's website.

3. Record of 'full' representations and Natural England's comments on them

Representation number:

MCA/CPH(W)/R/1/1557

Organisation/ person making representation:

[REDACTED], Historic England

Route section(s) specific to this representation:

Not specified

Representation in full

Historic England considers that the Coastal Access proposals for the Cleveleys to Pier Head, Liverpool section would have little or no impact on the historic environment, due to the route selected and the nature of the works proposed. There would certainly be no impact on designated heritage assets such as scheduled monuments, listed buildings or registered parks and gardens.

In coming to this conclusion we have considered the potential for the proposals to impact upon the Outstanding Universal Value [OUV] of the Liverpool Maritime Mercantile City World Heritage Site [WHS]. Again, due to the choice of route and the nature of the work proposed, we consider that there would be no impact on the OUV of the WHS. For this reason, we do not consider it necessary to recommend that a Heritage Impact Assessment be undertaken.

Natural England's comments

Natural England is grateful for this confirmation from Historic England.

Representation number:

MCA/CPH(W)/R/2/1629

Organisation/ person making representation:

[REDACTED], The Ramblers

Route section(s) specific to this representation:

Generally not specified, other than CPH-3-S015 to CPH-3-S017

Representation in full

We support the principle that some areas of spreading room along the proposed route of the ECP may have restrictions and exclusions. We also accept the principle that, where appropriate, some use may be made of salt-marshes for the route of the ECP in line with the guidance given in the Approved Scheme paras 7.8 pp77-79, and para 7.15 pp96-100. However, we are concerned that access to much of the land between the coast path and the sea has been restricted in some form.

We are concerned that the lack of any resources for monitoring and enforcement has led to undue and unfair restrictions being proposed for ECP walkers. We consider that NE is being forced to rely on

exclusionary directions due to a lack of resource to promote the Countryside Code and responsible access, in a way that was not the intention of the Marine and Coastal Access Act and that, if these resources were available, access for walkers (perhaps without dogs) could be managed in some areas without adverse impacts.

The ECP will not only be used by walkers but the route will prove a substantial benefit to those such as ornithologists, botanists and other people interested in natural history. This representation recognises the wider audience to benefit from the ECP other than long-distance walkers.

One of the many benefits is putting people back into contact with nature, with the accompanying improvements in health and wellbeing. Connection to coastal wildlife is one of the great benefits that could arise from walking the ECP. However, we are concerned that NE, through the extensive use of Directions, is constructing significant barriers that could result in a widening gulf between humanity and nature. We are fully supportive of the need to manage the coastal margin to protect, and support the recovery of, vulnerable bird species and other wildlife. However, addressing damaging behaviours, rather than restricting enabling access on foot to the coastal margin, would (in our view) provide better protection for wildlife while helping to tackle the problems brought about by a disconnection of our society from nature, including coastal habitats.

We are concerned that, in parts of this consultation, people are being kept away from walking on sea walls & embankments and from slightly elevated positions overlooking the seaward side of the path. Yet in comparable and more sensitive locations, in respect of potential disturbance to wildlife, in other parts of England the choice of route actually uses such features. In this regard the north-west appears to be treated differently.

Take for example CPH-3-S015 to CPH-3-S017. The presence of walkers on the embankment is said to disturb birds but the exclusion of the public will also enable people to continue to shoot them. Compare this with the route proposed around the Wash, for example in Lincolnshire. The route around Frampton Marsh and Freiston (to the SE and E of Boston). Here the route uses regularly walked (by walkers and ornithologists) embankments through RSPB reserves, routes which are currently well used. Here they are often used as places from which to observe rare and unusual birds both on the lagoons and the saltmarshes. These sites are at least as, if not more, sensitive than Hutton Marsh. It appears NE's proposals are more dependent on the advice from individual ecologist colleagues who do not appear to follow a nationally consistent scheme of appraisal. The issue of balance has, in our submission, failed to appropriately weigh the needs of walkers and natural historians.

We consider cases where the proposed ECP aligns with existing PRowS, and these are adjacent to areas subject to Directions to exclude, impractical - particularly where the areas are accessed regularly from the PRow though local custom.

The mapping basis used for many of these Directions is out of date. The river channels have changed substantially, sand banks have moved position and continue to do so on an almost daily basis. Consequently, many of the Direction maps include semi-permanent stretches of water, and many omit to cover spreading room which now exists and is adjacent to the Direction land, and these allow access to ECP walkers!

CPH 1A is commented on with CPH 2A below.

CPH 1C and 1D Walkers are most unlikely to use this area and the restriction will be unlikely to discourage naturalists interested in the saltmarsh. However, most people who want to access this area can do so from the public highway and the Direction is thus unenforceable and discriminatory against users of the ECP.

CPH 2A this seems to be very draconian with the whole of the area on Clifton Marsh being declared out of bounds. We are aware that it contains two SSSIs, a waste water treatment works and a waste disposal site, but are surprised that it does not allow for any access at all. Some form of access to some

or all of the flood defence embankments ought to be possible and if a part does give rise to an issue then the provision of field paths ought to be achievable.

CPH 2B indicates that the whole of the racing tracks and adjacent ground is to not be allowed on safety grounds. We can understand the reasons why access to the actual tracks is not to be allowed, but access to the edges of the site and wide gap between the western and middle tracks should be more than adequate to provide some safe access, with appropriate signage.

CPH 3C and 3D indicates land as being unsuitable for public access presumably because it is a marsh, which for the uninitiated is probably good advice. We are aware that some people do access this locality presumably with either good local knowledge or some sound advice. Any restriction notices will need to be carefully worded. This situation probably also applies elsewhere on the Ribble Estuary.

CPH 3E indicates land that is to be excluded because of wildlife reasons. Going back a century an attempt was made to reclaim more of Hutton Marsh, but the embankments were then abandoned. The SSSI was then declared to include this abandoned ground plus the surrounding marsh land for which no reclamation had been attempted. In recent years a further reclamation attempt has been made, but enclosing a smaller piece of ground, with this recent attempt appearing to be successful and the ground now being used for agricultural purposes. We are not surprised that this reclaimed land is shown on MAGIC as being SSSI land in unfavourable condition. This restriction is considered to be excessive and disproportionate.

CPH 4D shows the embankment for Hesketh Out Marsh with only one gap in it, but we have counted eight gaps in it, with the result that it is no longer practical to provide access here.

Natural England's comments

General responses

Natural England appreciates concerns expressed as to the extent of restrictions and exclusions affecting the coastal margin (and, in some cases, the trail itself). We are obliged to make use of the least restrictive option when considering ways to mitigate against various impacts. However, we are also obliged to follow the precautionary principle in relation to impacts relating to designated sites and protected species; where we cannot safely conclude that no impact on these sites and species will arise as a result of new access rights, we must restrict or remove those new rights as a last resort, assuming that no other mitigation measures are deemed feasible or sufficient. However, all long-term restrictions and exclusions must be regularly reviewed – and will be removed or relaxed if evidence supports such action.

Whilst the comparison between ostensibly similar sites around the country is understandable, we are clear that each site must be considered carefully, based on its individual circumstances. Many factors must be taken into account in assessing the potential impacts of new access rights, some of which will be more obvious than others. The assessment process is intended to be as objective and evidence-based as possible; whilst the process is conducted by local teams in relation to the sites within their area, all are reviewed by national experts to ensure the highest degree of consistency possible. In some cases, we are aware of existing impacts on protected sites and species, often arising from legal activities. We look for ways to reduce such impacts via the coastal access implementation programme, but this is often not possible to any great extent. There is very limited scope to conclude that new impacts are acceptable on the basis of existing impacts; in short, our proposals should not exacerbate an existing unsatisfactory situation with regards to nature conservation or other environmental/land management issues.

With regards to the base mapping for our report maps, we recognise that there will be considerable differences between some mapped features and their location/extent on the ground. This is inevitable, particularly in relation to rapidly and constantly changing areas such as estuaries, sand dunes and salt marshes. Unfortunately, there is no satisfactory solution to this; we must base our maps and proposals on the most up to date information available at the time. It is reasonable to assume that most walkers will interpret the extent of restrictions and exclusions as best they can, based on a sensible comparison between our maps and the situation on the ground before them.

Responses relating to specific restrictions maps

CPH 1A & CPH 2A: We spent considerable time exploring any possibilities for improved access much closer to the northern bank of the Ribble, in this area. Unfortunately, multiple land management and nature conservation concerns prevented anything other than the route proposed. Many of the fields in this area are used by large numbers of birds. Not only must we ensure that these are not impacted in their own right, we must also ensure that there is no risk to low-flying military aircraft using the adjacent airfield as a result of birds being disturbed and taking flight. We recognise that this will be a disappointing outcome for walkers, who would have hoped for a significant access improvement in the area. We will continue to look for opportunities to reduce or remove restrictions in the future – and potentially to make improvements to the route of the ECP itself, if feasible.

CPH 2B: The developed and actively used area of the wider common is actually much greater than indicated by many maps. In reality, there are few parts of this site that would provide any safe and appealing access opportunities for walkers. We explored the possibility of a route along the very edge of the estuary but concluded that, whilst this may have been possible, it was not justified given the difficulty in bridging Savick Brook and the lack of any ongoing riverside path opportunity to the west of Savick Brook.

CPH 3C & 3D: We note the comments. We take various factors into account in deciding whether saltmarsh or flat should be deemed unsuitable for access. This include frequency of inundation, nature of creeks, risk of being cut off from higher ground etc. We also take into account any advice provided by bodies such as the RNLi and HM Coastguard.

CPH 3E: Whilst we understand the desire for a route further towards the estuary, we can confirm that our assessment of potential impacts on protected birds concluded that an exclusion of new access rights from this area is necessary in order to avoid disturbance to significant congregations of protected birds. Any additional access would hinder efforts to bring the site into favourable condition. The situation is covered at pages 57&58 of the Habitats Regulations Assessment and pages 13&14 of the Nature Conservation Assessment. The reclaimed area mentioned in the representation is within Ribble & Alt Estuaries SPA and Ramsar, and Ribble Estuary SSSI.

CPH 4D: We note the point made and can confirm that there is no intention to provide new access along the outer, discontinuous flood embankment.

Representation number:

MCA/CPH/W/R/4/0016

Organisation/ person making representation:

[REDACTED], The Open Spaces Society

Route section(s) specific to this representation:

Generally not specified, other than CPH-3-S015 to CPH-3-S017

Representation in full

Content of representation identical to MCA/CPH(W)/R/2/1629 above.

Natural England's comments

Content of Natural England's response is identical to MCA/CPH(W)/R/2/1629 above.

Representation number:

MCA/CPH4/R/4/0160

Organisation/ person making representation:

[REDACTED] (Lancashire County Council)

Route section(s) specific to this representation:

CPH-4-S001 (and CPH-3-S042)

Other reports within stretch to which this representation also relates:

CPH 3

Representation in full

It is proposed that the coastal path terminates at on the eastern bank of the River Douglas (3-S042), the possible location for a pedestrian bridge, and starts again on the adjacent bank at Tarleton Lock (4-S001).

Access to 3-S042 on the eastern bank can be gained via Public Right of Way 7-8-FP1

Access to 4-S001 on the western bank at Tarleton Lock is via the canal bank from Plox Brow, which is not a recorded Public Right of Way.

The exclusion of the actual pedestrian bridge to link stretch 3 and 4 makes it necessary for walkers linking the coastal path on the eastern bank of the River Douglas and the coastal path on the western bank at Tarleton Lock to walk along the busy A59, crossing four sections of high speed carriageway unaided.

As the walked path between Plox Brow and Tarleton Lock is not recorded as a Public Right of Way or adopted highway, without Coastal Access Rights being applied between Plox Brow and Tarleton Lock it will not be possible to rejoin the coastal path at that location should access be obstructed.

It is the view of LCC that a pedestrian bridge across the River Douglas should be included within the cost of the infrastructure to provide a continual coastal path over the estuary and furthermore Coastal Access Rights applied to the canal path between Plox Brow and Tarleton Lock to secure continued access to 4-S001 for those joining the path on the western bank.

Natural England's comments

Natural England is grateful to Lancashire County Council for clarification of the situation locally. At the time of planning the route of England Coast Path, we believed that access was and would continue to be permitted along the vehicular track linking Plox Brow to CPH-4-S001. We understand now that this may not be the case and that, therefore, it would be necessary to ensure a satisfactory link between CPH-4-S001 and other publicly accessible routes/areas. Ideally, this would be by means of a new bridge at the suggested location. However, we have also offered to assist with negotiations locally that would aim to secure one or more permissive routes between Tarleton Lock and Tarleton/Plox Brow. Such additional linking routes would be of real value in terms of the local access network, even if a new bridge is installed.

An existing public footpath links the midpoint of CPH-4-S005 with Sutton Avenue, which in turn links with Hesketh Road.

We agree that a new bridge over the River Douglas is the only satisfactory solution and should be regarded as a high priority by all stakeholders. We will continue to engage with such stakeholders with the aim of creating a partnership approach to the delivery of a new bridge.

Representation number:

MCA/CPH4/R/6/1629

Organisation/ person making representation:

[REDACTED] (The Ramblers)

Route section(s) specific to this representation:

CPH-4-S001 to CPH-4-S049

Other reports within stretch to which this representation also relates:

N/A

Representation in full

We support NE's proposed route from CPH-4-S001 to CPH-4-S049.

We are pleased that CPH-4-S028 and the first part of CPH-4-S029 will provide access across Hundred End Gutter without the need to walk a kilometre inland and after a short distance along the road a kilometre, then back out.

Natural England's comments

Natural England is grateful for the message of support.

Representation number:

MCA/CPH4/R/8/0016

Organisation/ person making representation:

[REDACTED] (The Open Spaces Society)

Route section(s) specific to this representation:

CPH-4-S001 to CPH-4-S049

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Identical to the above representation also made by [REDACTED], on behalf of the Ramblers.

Natural England's comments

Natural England's comments are as for the representation made by [REDACTED], on behalf of the Ramblers.

Representation number:

MCA/CPH4/R/10/1654

Organisation/ person making representation:

[REDACTED] (Lancashire Local Access Forum)

Route section(s) specific to this representation:

Not specified

Other reports within stretch to which this representation also relates:

N/A

Representation in full

The Lancashire Local Access Forum (LLAF) advises three highway authorities (HAs): Blackburn-with-Darwen; Blackpool; and Lancashire County Council.

Firstly, we wish to put on record our sincere thanks to the staff of Natural England and the staffs of the Highway Authorities who have completed the survey work on the Cleveleys to Pier Head stretch. The resulting reports are of a high standard, reflecting the professionalism of those involved.

The LLAF comments on this southern stretch of the Lancashire coast follows on from our response in March 2020 to the northern stretch.

We are aware of more detailed responses to this consultation from user groups. The LLAF wishes to adopt a strategic position: we wish to expedite the completion of the project at an early date, whilst recognising the rights of user groups, landowners and others to engage fully in the consultation process.

We restrict our comments essentially to the crossing of the River Douglas. However, we are aware of a number of detailed suggestions, offering alternative minor variations to the route, which would make the Coast Path more attractive.

The issue of establishing a bridge across the River Douglas at Tarleton Lock has been a major strategic desire of the LLAF for a very long time. We understand the dilemma posed to NE in determining the

Coast Path in this stretch. It will be a great pity that, essentially the England Coast Path will be fractured at Tarleton. This is most regrettable. Yet the problem of finding a route on foot via the existing network and the busy A59 road is considerable. It is unpleasant, dangerous and unattractive. Hence most walkers will use the vicinity of Tarleton Locks as a place to start or to finish a particular journey. This situation will continue into the foreseeable future, it seems. We would urge all those potential partners who might secure the funding for the new bridge, to use the opening of the Coast Path as a catalyst to renewing their efforts. One local authority should take the lead on this. Technically, this might be the HA, Lancashire County Council, but the reality might be that the District authority, West Lancashire District Council, might be more prepared to take the lead. It has, for example, recently produced an excellent plan to develop a coherent cycle network across the District. At this point in time, there continue to be complex discussions between central and local governments about the future governance of Lancashire. These discussions are framed in the financial context of austerity. It may well need the crystallisation of an agreed new set of local government structures to emerge before individual projects, such as the bridge at Tarleton Locks, comes to fruition. We remain extremely frustrated at the lack of any progress with this project.

Natural England's comments

Natural England is grateful for the support of Lancashire Local Access Forum. We agree that a new bridge over the River Douglas is the only satisfactory solution to the discontinuity of the route, as proposed, and should be regarded as a high priority by all stakeholders. We will continue to engage with such stakeholders with the aim of creating a partnership approach to the delivery of a new bridge.

Relevant appended documents (see section 5): 5A: MCA/CPH4/R/10/1654 - Minutes of the Meeting held on Tuesday, 24th November, 2020

Representation number:

MCA/CPH6/R/3/1629

Organisation/ person making representation:

[REDACTED] (The Ramblers)

Route section(s) specific to this representation:

All, as listed below

Other reports within stretch to which this representation also relates:

N/A

Representation in full

We support NE's proposed route for CPH-6-S001 and CPH-6-S002.

For CPH-6-S003 the route shown is that used by the cyclists, whilst for those who walk a good public footpath exists directly connecting these two points through woodland which is a good footpath to use. This public footpath that we propose should be used as part of the Coast Path is part of the Sefton Coastal Path. MoD land exists either side of this footpath but they do not fire across this locality.

We support NE's proposed route for CPH-6-S004 to CPH-6-S094.

The only other comment we would make is that some of the signage provided several years ago as part of the Sefton Coastal Path is now looking old and tired, which ought to be renewed, but this probably falls outside the remit of the Coastal Way. However somebody ought to be providing money so that signage can be renewed when old signage shows the effects of the passing years.

Natural England's comments

Natural England is grateful for the messages of support and the information provided.

CPH-6-S003: We understand that the public footpath mentioned may not be available to walkers in the future as it runs along an unstable embankment and it is likely the landowners (MOD) will seek a stopping-up order which would allow them better operational use of this corner of the firing range. With this in mind, and given the suitability of the nearby dual-use route, we opted for the latter. The public footpath will be available as a short-cut to walkers, as long as it's legally accessible.

We anticipate that Sefton MBC will chose to align the Sefton Coastal Path with the approved route of the England Coast Path, in the future. If so, all signage relevant to the route would be maintainable under ongoing management agreements, with significant funding from government.

Representation number:

MCA/CPH6/R/4/0016

Organisation/ person making representation:

[REDACTED] (The Open Spaces Society)

Route section(s) specific to this representation:

As above

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Identical to the above representation also made by [REDACTED], on behalf of the Ramblers.

Natural England's comments

Natural England's comments are as for the representation made by [REDACTED], on behalf of the Ramblers.

4. Summary of 'other' representations making non-common points, and Natural England's comments on them

Representation ID:

MCA/CPH(W)/R/3/1678

Organisation/ person making representation:

[REDACTED], Cycling UK

Name of site:

N/A

Report map reference:

N/A

Route sections on or adjacent to the land:

N/A

Summary of representation: The representation mentions that various parts of the proposed route are already designated as cycle routes and suggests that it would be better if higher rights (specifically cycling) were to apply more widely.

Natural England's comment: Whilst Natural England is keen to support the provision of improved cycling routes and facilities, the duty central to the England Coast Path programme relates to the development of a walking route around the coast. We will assist others to develop higher rights where appropriate but we have no specific powers or duties to create cycle routes. We work closely with local authorities over the design and establishment of the England Coast Path and would expect to discuss opportunities for higher rights where relevant. In particular, we aim to ensure that any major investment – for example, in major new bridges – facilitates both cycling and walking improvements.

Representation ID:

MCA/CPH(W)/R/5/1681

Organisation/ person making representation:

[REDACTED], Merseyside Environmental Advisory Service (MEAS)

Name of site:

N/A

Report map reference:

Overview index map

Route sections on or adjacent to the land:

N/A

Summary of representation: The representation sets out the credentials of MEAS and the extent to which it works with local authorities in the area. It suggests that it will provide input specific to this project. Finally, it supports the conclusions of the Habitats Regulations Assessment.

Natural England's comment: Natural England is grateful for the message of support over the Habitats Regulations Assessment and acknowledges that MEAS is probably well-placed to assist local authorities.

Representation ID:

MCA/CPH(W)/R/6/0305

Organisation/ person making representation:

[REDACTED], United Utilities

Name of site:

Not specified

Report map reference:

Map A (Overview)

Route sections on or adjacent to the land:

Not specified

Summary of representation:

The representation advises that the proposals should not interfere with United Utility's assets or operations. It also mentions caution with respect to the environment, designated sites, watercourses etc.

Natural England's comment:

Natural England is confident that there is no significant risk to United Utility's business or assets as a result of the published proposals. The relevant access authorities will hold further discussions with owners and occupiers, prior to undertaking establishment works. The published Habitats Regulations Assessment and Nature Conservation Assessment detail our consideration of potential effects on designated sites and species.

Representation ID:

MCA/CPH4/R/1/0770

Organisation/ person making representation:

[REDACTED]

Name of site:

Not specified

Report map reference:

Not specified

Route sections on or adjacent to the land:

CPH-4-S033 & S034

Other reports within stretch to which this representation also relates

N/A

Summary of representation: The representation would seem to be generally supportive of the proposals and of the principle of public access to the coast.

Natural England's comment: We are grateful for the message of support.

Representation ID:

MCA/CPH4/R/2/1006

Organisation/ person making representation:

[REDACTED] (James Mayor and Co Ltd, Tarleton Boatyard)

Name of site:

Tarleton Boatyard, Tarleton Lock

Report map reference:

CPH 4a

Route sections on or adjacent to the land:

CPH-4-S001

Other reports within stretch to which this representation also relates

N/A

Summary of representation: The representation expresses concerns about the proposed starting point of the route on the western bank of the River Douglas and the extent to which this will lead to an increase in public use of a private access road through the boatyard. There are further concerns about the suggested location of a new bridge, adjacent to the lock. Two alternative locations for a new bridge, both downstream of the boatyard, are put forward.

Natural England's comment: At the time of planning the route of England Coast Path, we believed that access was and would continue to be permitted along the vehicular track linking Plox Brow to CPH-4-S001. We understand now that this may not be the case and that, therefore, it would be necessary to ensure a satisfactory link between S001 and other publicly accessible routes/areas. Ideally, this would be by means of a new bridge at the suggested location. However, we have also offered to assist with negotiations locally that would aim to secure one or more permissive routes between Tarleton Lock and Tarleton/Plox Brow. Such additional linking routes would be of real value in terms of the local access network, even if a new bridge is installed.

An existing public footpath links the midpoint of CPH-4-S005 with Sutton Avenue, which in turn links with Hesketh Road. In the absence of any other alternatives, we would expect to clearly indicate this as being an appropriate way to walk between the end of CPH 4 at Tarleton Lock and other areas.

Lancashire County Council has undertaken some investigative work in connection with a potential new bridge over the River Douglas. This included some consideration of various locations, including adjacent to Plox Brow, in the vicinity of the disused pipe bridge and at the site of the disused railway (these latter two being the sites suggested in the representation).

Relevant appended documents (see Section 5):

Representation ID:

MCA/CPH4/R/3/1676

Organisation/ person making representation:

[REDACTED] (West Lancashire Borough Council)

Name of site:

Land east of River View, Tarleton

Report map reference:

CPH 4a

Route sections on or adjacent to the land:

CPH-4-S006

Other reports within stretch to which this representation also relates

N/A

Summary of representation: The representation is generally supportive of both the proposals and the improvement in public access facilities locally. It also raises the work being undertaken locally towards the development of a 'Linear Park', on the riverside between Hesketh Bank and Tarleton – and goes on to request that communications are maintained between all key stakeholders during the implementation of these two projects.

The representation also raises slight concerns over any implementation of roll-back for the coast path, in a way which might impact on land owned by WLBC, and asks that communications be maintained over this aspect as well, in the future.

Finally, it strongly supports the establishment of a new bridge over the River Douglas, on the grounds that any other walking round involving the A565 road bridge would be unsafe – and goes on to suggest that consideration be given to the modification of the disused pipe bridge so as to provide a pedestrian crossing.

Natural England's comment: We are grateful for the message of support. We are aware of the plans for a linear park and remain keen to work with other stakeholders so as to maximise the linkage between the two projects with similar aims.

We can confirm that there will be ongoing communications with landowners over any implementation of roll-back, where roll-back is both approved and necessary.

We agree that a new bridge over the River Douglas is the only satisfactory solution to the discontinuity of the route, as proposed, and should be regarded as a high priority by all stakeholders. We will continue to engage with such stakeholders with the aim of creating a partnership approach to the delivery of a new bridge. We agree with the assessment of risk around any promoted use of the A565 road bridge for public access – and hence this did not form part of our proposals for the England Coast Path.

Relevant appended documents (see Section 5):

5C: MCA/CPH4/R/3/1676 - Copy of the Feasibility Study for the proposed River Douglas Linear Park (Gillespies, April 2010).

Representation ID:

MCA/CPH4/R/5/1519

Organisation/ person making representation:

[REDACTED] (Hesketh with Becconsall Parish Council)

Name of site:

Not specified

Report map reference:

CPH 4a

Route sections on or adjacent to the land:

CPH-4-S008 to S010

Other reports within stretch to which this representation also relates

N/A

Summary of representation: The representation strongly supports the inclusion of a new bridge over the River Douglas, as part of the implementation of the coast path. It goes on to suggest that consideration should be given to the modification of the disused pipe bridge, so as to provide a pedestrian crossing. It also mentions two sections of the proposed route (CPH-4-S009 and S015) that are below mean high water. Critically, it states that a new surfaced route will be delivered in this area, during 2021 to 2022, which will be broadly similar to the proposed ECP route, but which will make some improvements. It is strongly recommended that the proposed ECP route be modified slightly so as to correspond to this new route.

Natural England's comment: We agree that a new bridge over the River Douglas is the only satisfactory solution to the discontinuity of the route, as proposed, and should be regarded as a high priority by all stakeholders. We will continue to engage with such stakeholders with the aim of creating a partnership approach to the delivery of a new bridge.

We can confirm that some consideration has already been given by Lancashire County Council to the possibility of utilising the existing, disused pipe bridge. The initial view is that, whilst the pipe bridge may seem like a relatively easy solution to the issue, the difficulties in converting this structure to provide safe and sustainable access for all over the river almost certainly significantly outweigh the apparent benefits.

We are particularly grateful to the Parish Council for bringing to our attention the plans to create a new surfaced route that is largely coincident with the proposed route of the England Coast Path. We will continue a dialogue with the key stakeholders with regards to this project, with the anticipation that we will wish to slightly modify the proposed ECP route so as to be completely co-aligned. We will pursue this as a matter of priority, in the hope that it can be resolved prior to any approval of the coastal access proposals.

Representation ID:

MCA/CPH4/R/7/1579

Organisation/ person making representation:

[REDACTED]

Name of site:

River Douglas

Report map reference:

Not specified

Route sections on or adjacent to the land:

Not specified

Other reports within stretch to which this representation also relates

CPH 3

Summary of representation: The representation is generally supportive of the proposals, but strongly requests that implementation should include the required new bridge over the River Douglas. It raises safety concerns over the A59 road bridge, if used by those walking the coast path – and goes on to suggest various locations which would be suitable for a new bridge to be installed.

Natural England's comment: We agree that a new bridge over the River Douglas is the only satisfactory solution to the discontinuity of the route, as proposed, and should be regarded as a high

priority by all stakeholders. We will continue to engage with such stakeholders with the aim of creating a partnership approach to the delivery of a new bridge. We agree with the assessment of risk around any promoted use of the A565 road bridge for public access – and hence this did not form part of our proposals for the England Coast Path.

Lancashire County Council has undertaken some investigative work in connection with a potential new bridge over the River Douglas. This included some consideration of various locations, including adjacent to Plox Brow, in the vicinity of the disused pipe bridge and at the site of the disused railway.

Representation ID:

MCA/CPH4/R/9/0008

Organisation/ person making representation:

[REDACTED] (The Disabled Ramblers)

Name of site:

Various

Report map reference:

CPH 4a, CPH 4b, CPH 4c, CPH 4d, CPH 4f, CPH 4h & CPH 4i

Route sections on or adjacent to the land:

CPH-4-S006, CPH-4-S012 to CPH-4-S017, CPH-4-S019, CPH-4-S020, CPH-4-S022, CPH-4-S023, CPH-4-S027 to CPH-4-S029, CPH-4-S030, CPH-4-S030 to CPH-4-S032 & CPH-4-S035

Other reports within stretch to which this representation also relates

N/A

Summary of representation: The representation raises general and specific concerns about accessibility of some aspects of the proposals. It asks that greater efforts are made to ensure that less mobile users are able to use and enjoy as much of the ECP as might ever be possible. Support is expressed for the intended removal of all stiles, but with a request that any gates must accommodate large, off-road mobility scooters, in compliance with the relevant British Standard.

Various changes to specific suggested infrastructure items are requested.

Natural England's comment: We are grateful for both the general and specific advice provided by the Disabled Ramblers. We will discuss each of these with the relevant access authority, prior to establishment of the England Coast Path, so as to ensure that all works and infrastructure are both fully compliant with law and best practice, and as accessible to all as possible.

Relevant appended documents (see Section 5):

5D: MCA/CPH4/R/9/0008 - The Disabled Ramblers Document: Man-made Barriers and Least Restrictive Access

Representation ID:

MCA/CPH6/R/1/1650

Organisation/ person making representation:

[REDACTED] (The Seafront Residents' Action Group)

Name of site:

Sefton seafront

Report map reference:

CPH 6e, CPH 6f & CPH 6g – as well as CPH 6C and Overview map D

Route sections on or adjacent to the land:

CPH-6-SO25

Other reports within stretch to which this representation also relates

N/A

Summary of representation: The representation is generally supportive, in terms of both the proposed trail and the extent of the coastal margin. The exception to this is in relation to CPH-6-SO25, where it is suggested that the coastal margin should extend only as far as the inland edge of the sand dunes.

Some concerns are expressed around flora and fauna in an area close to Seaview Terrace/Harbord Terrace.

The representation then goes on to query the proposed s25A direction at what are referred to as the mudflats at Brighton-le-Sands, Crosby, in our report documents.

There is reference to the continual build-up of wind-blown sand on the promenade, with the request that more is done to manage this issue, so removing the need for roll-back.

Finally, evidence is provided as to the historic environment locally, with some concern about impact on this if the trail should roll back inland.

Natural England's comment: We are grateful for the advice and comments from the Residents' Action Group.

In relation to the extent of the coastal margin proposed, alongside CPH-6-SO25, we can confirm that we had discussions with the local authority about this. We concluded that the proposed landward boundary of the coastal margin is much more distinct on the ground, compared with the landward edge of the dunes. The additional area is already in public use, so there is an advantage in formalising that public use (not least for the landowners, who will benefit from a reduction in occupier's liability).

We note the concerns about the flora and fauna of the area; however, we would not anticipate any significant increase in access in this area as a result of our proposals other than, perhaps, some increase in use of the trail itself. The Action Group state that Sefton Council's Local Plan has recognised the area to the west of Seaview Terrace and Harbord Terrace as an important nature site. The area supports breeding pairs of skylarks and rare plants. They state that it is partially enclosed by fencing on its eastern and southern sides, and probably ought to have fences to its west and north to. Our proposals would not prevent the Council or another local group from erecting fences to protect the flora and fauna if required. On that basis, we would not expect to see any increased risk to the local fauna and flora.

The proposed exclusions over parts of the foreshore reflect the view that this area is deemed generally unsuitable for a new right of access, taking into account the prevalence of quicksand, mud and gullies (as recognised by existing local signage). Our proposal was supported by the relevant authorities. However, it does not remove any existing rights to access this part of the foreshore.

We will continue to discuss the issues over sand on the promenade with the local authority; we recognise that this is an ongoing issue.

Relevant appended documents (see Section 6):

5E: MCA/CPH6/R/1/1650 - 'SRAG Representations about Coastal Access Report CPH 6'

Representation ID:

MCA/CPH6/R/2/1677

Organisation/ person making representation:

[REDACTED] (Crosby and Waterloo Coastal Community Team)

Name of site:

Between junction of Cambridge Rd, Brunswick Parade and Harbord Rd

Report map reference:

CPH 6f & CPH 6g

Route sections on or adjacent to the land:

CPH-6-S025 to S027 inclusive

Other reports within stretch to which this representation also relates

N/A

Summary of representation: The representation asks that the extent of the coastal margin might be increased in this area, on the basis that this would facilitate roll-back of the ECP in the future, should it become impossible to continually clear build-up of sand from the proposed route. It also mentions the intention to develop a new cycle track slightly further inland, beyond the proposed extent of the coastal margin.

Natural England's comment: We understand the concerns over the future of the proposed route (due to the build-up of sand). We can confirm that the trail would be able to move inland to a new alignment, as and when necessary, either under our roll-back powers or as a result of a variation process. The presence or absence of coastal margin does not impact on the ability to realign the route. However, it is likely that the extent of the coastal margin may well also be subject to change as a result of any realignment of the trail. A temporary route might be identified as soon as the path became unsuitable and rollback could be swiftly implemented in this area.

We will continue to liaise closely with local authorities over any plans for England Coast Path realignment and cycle track development.

We can confirm that a wider extent of the coastal margin was considered in this area but this was not supported by the landowner, so was not taken forwards.

Relevant appended documents (see Section 6):

5F: MCA/CPH6/R/2/1677 - 'Response to route for new coastal path route through Crosby Coastal park proposed by Natural England.'

5. Supporting documents

5A: MCA/CPH4/R/10/1654 - Minutes of the Meeting held on Tuesday, 24th November, 2020

[REDACTED DUE TO PERSONAL INFORMATION THROUGHOUT]

5B: MCA/CPH4/R/2/1006 - Scanned form and additional notes

[REDACTED DUE TO PERSONAL INFORMATION THROUGHOUT]

5C: MCA/CPH4/R/3/1676 - Copy of the Feasibility Study for the proposed River Douglas Linear Park (Gillespies, April 2010). (**Note:** this document has been published separately on the webpage, due to its length.)

5D: MCA/CPH4/R/9/0008 - The Disabled Ramblers Document: Man-made Barriers and Least Restrictive Access

Man-made Barriers & Least Restrictive Access

There are a significant and steadily increasing number of people with reduced mobility who like to get off tarmac onto natural surfaces and out to wilder areas to enjoy great views and get in touch with nature whenever they are able to. There are many ways they achieve this, depending on how rough and steep the terrain is. A determined pusher of a manual wheelchair can enable access to a disabled person across grass and up steep hills. An off-road mobility scooter rider can manage rough terrain, significant slopes, cross water up to 8" deep, and depending on their battery type and the terrain they are on, they can easily run 8 miles or more on one charge. Modern batteries are now available that allow a range of up to 60 miles on one charge!

Many more people too are now using mobility vehicles in urban areas, both manual and electric. 'Pavement' scooters and powerchairs often have very low ground clearance, and some disabilities mean that users are unable to withstand jolts, so well placed dropped kerbs and safe places to cross roads are needed.

Modern mobility vehicles can be very large, and many man-made barriers that will allow a manual wheelchair through are not large enough for all-terrain mobility vehicles, or for 'pavement' scooters and prevent legitimate access.

Users of mobility vehicles have the same rights of access that walkers do. Man-made structures along walking routes should not be a barrier to access for users of mobility vehicles. New structures should allow convenient access to mobility vehicle riders as standard, and should comply with British Standard BS5709: 2018 Gaps Gates and Stiles which places the emphasis on Least Restrictive Access. Suitability of structures should always be considered on the assumption that a person with reduced mobility will be going out without more-mobile helpers, so will need to operate the structure on their own, seated on their mobility vehicle.

When it is impossible to avoid man-made structures which are a barrier to mobility vehicles, wherever feasible a nearby alternative should be provided. For example, a slope adjacent to steps or a signed short diversion.

Whilst BS5709:2018 does not automatically apply retrospectively to most existing structures, Disabled Ramblers would like to see existing structures removed and replaced if they prevent access to users of mobility vehicles. Some structures can have a 'life' of 15 years – it would be a crying shame if those with limited mobility have to wait this long before they can be afforded the same access that walkers have to those areas where the terrain is suitable for mobility vehicles.

Disabled Ramblers campaign for:

- Installation of new structures that are suitable for those who use large mobility vehicles, and that comply with British Standard BS5709: 2018 Gaps Gates and Stiles.
- Review of existing man-made structures that are a barrier to those who use mobility vehicles, and where possible removal and replacement with suitable structures to allow access to these people
- compliance with the Equality Act 2010 (and the Public Sector Equality Duty within this act)
- compliance with the Countryside Rights of Way Act 2000
- adherence to the advice from Disabled Ramblers as set out below.

Useful figures

- **Mobility Vehicles**
 - **Legal Maximum Width of Category 3 mobility vehicles: 85cm.** The 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

Gaps

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

Bollards

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

Pedestrian gates

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

Field gates

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

Bristol gates

(Step-over metal gate within a larger gate: <https://centrewire.com/?s=bristol>) These are a barrier to mobility vehicles as well as to pushchairs and 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, 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. Some 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 only recommend the [Centrewire Woodstock Large Mobility](#) kissing gate. This is fitted with a RADAR lock which can be used by some users of mobility vehicles. NB this is the only type of 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 as 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 being listed by Historic England, 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 a suitable alternative structure. If there are good reasons to retain the stile, such as it being listed by Historic England, then 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 path follows a footway (e.g. 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 path passes over a kerb, a dropped kerb should be provided.

Disabled Ramblers March 2020



Seafront Residents' Action Group Representations about Coastal Access Report CPH 6

The Seafront Residents' Action Group is an unincorporated association with a constitution, and an elected committee. Our objects include protecting the built and natural environment in and around Crosby Coastal Park. Our membership is open to all residents and owners of properties along the seafront facing Crosby Coastal Park at Waterloo, Crosby and Blundellsands.

As local residents who are fortunate to live along the seafront we are always concerned to ensure that the benefits of this special area are preserved and if possible enhanced; not only for the sake of our own residential amenity, but also for the sake of the many visitors who regularly enjoy the quiet green recreation afforded by the Coastal Park and the beach.

We wish to place on record that we welcome Natural England's proposed route for the England Coast Path as detailed in Report CPH 6 and as shown on maps CPH 6e, 6f and 6g. We note that the Report states that the route differs from the existing Sefton Coast Path which is aligned to pass between the two lakes in the Marine Park part of Crosby Coastal Park. Instead the proposed route follows the path on the south side of the large lake along the perimeter with the Port of Liverpool estate and joins the southern section of the promenade. This route is closer to the sea and maintains views of it (Paragraph 6.2.5 and Maps 6f and 6g) and as such we welcome the proposals.

We also support the proposed ambit of the landward side of the coastal margin as shown washed mauve on these maps, except specifically on Map 6f landward of the route section CPH-6-SO25CP. Our principal representation is that here the margin should end at the inland edge of the sandhills as is proposed generally north and south in the vicinity.

We do not think the margin should extend as currently proposed all the way to the back garden walls of the houses on Endsleigh Road; nor as far as the other roads and paths of Westward View, River View, Glen Bank, Beach Bank, Seaview Terrace, and Harbord Terrace.

We respectfully disagree with the assertion in the Table at paragraph 6.3.2 that it is not possible to identify physical features that coincide with the extent of the dune habitat and that the edge of the greenspace proposed is the first identifiable boundary feature. We suggest that, on the contrary, the point at which the sandhills give way to mown grass is sufficient to identify a boundary. The grass was formerly mowed six times a year and now only twice, but the boundary remains discernible.

We have some concern too about encouraging access to the enclave opposite and to the west of Seaview Terrace and Harbord Terrace, which is partially enclosed by fencing on its eastern and southern sides. In recent years this area has been colonised by what remain of breeding pairs of skylarks and by rare plants. It probably ought to have fences to its west and north. Although the Marine Park was originally constructed between 1969 and 1973 as an amenity park, in recent years Sefton MBC has been treating it as a hybrid of amenity park and nature reserve. There is a synergy between the Seaforth Nature Reserve to the south west (Map 6g) and the wider Coastal Park. Many of the water fowl and seabirds that frequent Seaforth Nature Reserve also visit the Marine Park and often use the smaller fresh water lake within it. Sefton Council's Local Plan has recognised this part of the Coastal Park as an important nature site.

Our next representation relates to paragraphs 6.2.19 and 20, and to Directions Map 6C. The information they contain will probably come as a surprise to most local residents and visitors. It has not been subject to any consultation of which we are aware.

Map 6C describes the area as 'The mudflats at Brighton-le-Sands, Crosby' although it shows it to be opposite Waterloo. Local people consider Brighton-le-Sands to be further north, as shown on the Map, and think of the red area as part of Crosby Beach, or as Waterloo Beach, or as "the beach at South Road". It is the first accessible beach north of Liverpool and, as the Reports acknowledge, it is a popular destination.

We understand that Natural England as the relevant body intends to direct under section 25A of the Countryside and Rights of Way Act 2000 that in the area washed red on Directions Map 6C the new general rights of access which would otherwise flow from the new National Trail afforded by the England Coast Path shall be excluded all year round.

The stated grounds are that this area is unsuitable for public access. The mudflats are said not to provide a safe walking surface, to be soft and sinking in nature, and to be subject to frequent tidal inundation. That is true of the beach near the buried sewer pipeline (shown on Map 6C) approximately opposite and to the west of the water treatment works near the path from Blucher Street car park next to Beach Lawn Garden. But we are not sure that it applies to the entire area washed red. This has long been an area of public resort, although we accept that its configuration and characteristics changed when the Marine Park was created, partly as a bulwark against further encroachment by the docks.

We understand that the legal effect of the direction will be that the seaward side of the coastal margin with its new rights of access and spreading room will, in the red area, only extend to the mean high tideline and not, as generally elsewhere, across the beach to the mean low tideline. In other words as an exception here the foreshore will be out of bounds. This will prevent a right of access to 'Another Place', the iron men statues of Sir Antony Gormley's artwork, which nonetheless will continue to act as an allurements to closer inspection, which they do from the rock armour near the Port for nearly two miles northwards along the coast as far as the Coastguard Station at Hall Road.

We have attached photographic evidence of the public resorting to this area in recent times for the meeting of the Cunard Cruise Line's Three Queens in May 2015 and for the Tall Ships Regatta in May 2018. (All photographs copyright of our Chair.) These events were exceptional, but people and dogs visit this part of the beach on a daily basis.

We are of course only too aware that members of the public get into difficulty from sinking sand and mud as an unfortunately regular occurrence here and elsewhere on the coast and we support any necessary protective reduction in access. However, for clarity Sefton Council and the general public need to be advised by Natural England whether or not they consider that public access here through traditional toleration by the Crown will be considered to override the effect of their proposed Direction.

Our research shows that the mean high tideline along the shore in front of the Marine Park part of Crosby Coastal Park has been gradually and imperceptibly receding to the west since at least the 1840s. When the Marine Park between the Port and the Leisure Centre on Map 6f was completed in 1973, for much of its length the new seawall was a revetment 15 feet above the level of the beach, soundly engineered with drainage pipes for moisture outflow, with steps and a

ramp down to the beach. Along the top ran a promenade, a walkway/cycleway with a metal barrier. Since then the beach level has steadily risen, sandhills have accreted on both sides of the seawall, railings have been removed and the drainage channels have become blocked. For years successive local

Councils worked to prevent Nature colonising the Marine Park with sand, clearing the beach and the promenade, but since the 1990s Nature has gained, or as a result of financial constraint or otherwise, been allowed to gain, the upper hand.

The CPH Overview Report and Report CPH6 consider that natural coastal processes are causing dunes to build up over the promenade and Coastal Park, creating a current management issue for Sefton MBC. Should it cease to be possible to maintain a route suitable for walkers along the proposed alignment of the Trail at the northern end from the Leisure Centre to the path from Blucher Street car park, and perhaps even at the southern end of the Marine Park towards the lakes, these Reports concede that it may be necessary to roll back and bring the trail further inland. Our representation on this aspect is that every affordable step should be taken by the relevant Authorities to prevent the necessity for roll back at these locations. Judging by social media comment the last thing local people want is for the promenade to be split into segments separated by sand dunes. The promenade was built to be the best viewing point for the stretch of coastline and beach running from the Port of Liverpool to Crosby Coastguard Station. We have a splendid length of scenic coast to enjoy, all the way from the Port through Crosby Coastal park as far as Hightown, augmented in part by a world famous art installation. The seawall/promenade is ideally situated to afford superb green recreation and play a key role in the new England Coast Path.

Sand has blown through discussions of local public policy for the seafront here at least since the Victorian era, and probably since Georgian times. SRAG has always been resolutely opposed to the loss of any part of the promenade. The original principal reason for the formation of our Action Group in the late 1990s was to try to persuade our Council to maintain the promenade, its path and its railings, and to oppose the gradual encroachment of the rising beach level and the steady accretion of the sandhills. We have consistently tried to persuade the Council to keep the path in good repair and open for pedestrians, cyclists, prams and wheelchairs. At present we therefore respectfully advocate keeping the Path clear along the route of the proposed National Trail through Map 6f.

Sefton MBC and the Combined Liverpool Regional Authority promote the area with photographs of 'Another Place'. In the short term we take the opportunity afforded by these representations to ask Natural England and/or the Secretary of State for the Environment to assist Sefton and the Combined Regional Authority with the necessary revenue funding to keep the proposed Path through Map 6f clear of sand. In the medium term we hope that capital funding will be provided by the Environment Agency, the Councils and their

partners for the renewal and replacement of the sea defences with a new promenade built further west into the estuary at points where accretion has taken hold.

We wish to draw to your attention that Map D 'Key Statutory Historic Designations- CPH-L', purports to show listed buildings and Conservation Areas, but instead seems to show the listed buildings and Conservation Areas as 'Coastal Historic Environmental Record Sites'.

The development along the shore began in earnest with the opening of the The Royal Waterloo Hotel in 1816 on the anniversary of the battle of Waterloo. The four historic terraces of residences were built by the 1870s. The Seafront Gardens were added in the 1930s. Most of the terrace dwellings became listed buildings in 1972 and the Waterloo Conservation Area was created in September of that year. In 2000 that Conservation Area was widened to embrace the Seafront Gardens. The Christchurch Conservation Area was designated in May 2006.

We are pleased that many of these heritage assets will be visible about 550 yards from the shore side of the proposed Trail, but as explained above we do not wish to see the Trail roll back inland to be closer to them.

In summary we approve of the proposals, which we welcome in the hope that the establishment of the new National Trail of the England Coast Path on the route proposed will provide additional impetus and resources for the preservation and enhancement of local amenity for the benefit of residents, businesses and the general public.

[REDACTED]

Chair. Seafront Residents'Action Group.

[REDACTED]

28 November 2020.

5F: MCA/CPH6/R/2/1677 - 'Response to route for new coastal path route through Crosby Coastal park proposed by Natural England.'

[A response from Crosby and Waterloo Coastal Community Team to proposals to improve public access to and along the stretch of coast between Cleveleys and Pier Head Liverpool, specifically in relation to section SO25 to SO27](#)

Crosby and Waterloo Coastal Community Team recommends that consideration should be given to extending the area identified in purple as "spreading room" between Cambridge Road and the northern end of Beach Lawn Gardens.

The proposal indicates that part of the proposed route along the promenade (SO25 to SO27) "although it may become unsuitable for multiuse route, it was still deemed suitable for the trail at present".

Currently the sand has accumulated so deeply that the path is already almost inaccessible, and to anyone with mobility difficulties, is impassable. Although SMBC are still trying to remove the vastly accumulated sand, financial restraints make keeping the route open increasingly difficult.

If ever in future it becomes necessary that an alternative route is necessary and the coastal path has to be able to "roll back", an alternative route that is imminent could be adopted.

Sefton MBC is shortly to instate a new cycle path which will be part of a new national coastal cycle path. The route chosen is not however to be routed along the promenade on the seaward side of the Marine lakes, but will instead be routed close to the seaward boundary walls of properties in Brunswick Parade and the four seafront gardens.

In future if it was to be necessary to reroute the coastal path for this stretch, the new cycle way would not be an option as **this route would not be within the defined purple "spreading room"**.

Crosby and Waterloo Coastal Community Team recommends that the area designated as spreading room adjacent to the promenade from the docks up to the Beach Lawn access path, be extended to the boundary walls of Marine Crescent Gardens and Marine [Terrace] Gardens and to the rear of properties in Brunswick Parade.

NT 1.12.20