Coastal Access – Eastbourne to Camber lengths EBC1 and EBC3 to EBC6



Representations with Natural England's comments

September 2021

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1. Introduction

This document records the representations Natural England has received on the proposals in length reports EBC1 and EBC3 to EBC6 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 Eastbourne to Camber they are included here in so far as they are relevant to lengths EBC1 and EBC3 to EBC6 only.

2. Background

Natural England's compendium of reports setting out its proposals for improved access to the coast from Eastbourne to Camber, comprising an overview and seven separate length reports, was submitted to the Secretary of State on 27 February 2020. This began an eight-week period during which representations and objections about each constituent report could be made.

In total, Natural England received 25 representations pertaining to length reports EBC1 and EBC3 to EBC6, of which 14 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 11 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. Where Natural England's comments and/or the text of the representation are the same for each length in which the representation appears, they will be produced in full only at the first occurrence. Thereafter, to save repetition Natural England's comments and/or the representation text will refer to the first occurrence.

4. Representations and Natural England's comments on them

Length Report 1

Full representations

Representation number: MCA/EBC Stretch/R/2/EBC1939

Organisation/ person making representation:

Historic England – [redacted]

Route section(s) specific to this representation:

Whole Stretch, with specific comments about EBC1, EBC 4, EBC 5

Other reports within stretch to which this representation also relates: EBC 2, EBC 3, EBC 6, EBC 7

Representation in full

Would like to make comments about this scheme in general, and also specifically about a number of designated assets (scheduled monuments and listed structures) on certain maps. These are:

EBC 1:

- Eastbourne Redoubt (scheduled monument, list entry: 1017358)
- Martello Tower 66 (scheduled monument, list entry: 1017356)

EBC 4:

• Carlisle Parade car park (grade II listed, list entry: 1400579)

EBC 5:

• Iron Age Cliff Castle and site of St Georges Churchyard on East Hill (scheduled monument, list entry: 1011086).

Historic England has no objections to the scheme. We understand that the proposal will be a relatively low-key scheme which will involve re-using a lot of existing paths and therefore require minimal change; and thus there is likely to be little change to the historic environment.

We understand that there may be a need for some ground works (e.g. to improve existing or lay new paths, or install infrastructure). This could have some impact on undesignated archaeology; and you should therefore <u>consult the County Archaeologist</u> in this regard.

The path does pass through a number of scheduled monuments. These include:

- Eastbourne Redoubt (scheduled monument, list entry: 1017358) (EBC 1)
- Martello Tower 66 (scheduled monument, list entry: 1017356) (EBC 1)
- Iron Age Cliff Castle and site of St Georges Churchyard on East Hill (scheduled monument, list entry: 1011086) (EBC 5)

Both of the former two monuments include the built structures themselves, but also some land around them, hence why the path does still pass through the scheduled areas.

If any ground works are proposed within these scheduled areas (e.g. for laying new paths, restoring/renewing/resurfacing existing ones, or introducing infrastructure) then a prior application for Scheduled Monument Consent (SMC) will be required; and such works may not take place until SMC has been obtained. The applicant would need to apply to Historic England for SMC.

The path will also pass through a number of Conservation Areas and through the grade II listed Carlisle Parade Car Park (EBC 4). You should <u>consult the local Conservation Officer</u> with regard to the impacts of the proposal on these assets.

Natural England's comments

Whilst developing our proposals we have considered the potential effects of improved coastal access, construction and maintenance works on key heritage features. We have consulted with Historic England (HE) regarding Scheduled Monuments (in line with para 4.9.5 Coastal Access Scheme) to ensure that our proposals would not have a detrimental effect on heritage assets.

In regard to the Scheduled Monuments (SM) highlighted in the Representation:

EBC 1: Eastbourne Redoubt (scheduled monument, list entry: 1017358)

Whilst the trail does pass through the boundary of the SM, it follows an existing well used promenade to the south of the site. We have not proposed any alternations to the promenade, nor any new infrastructure within the boundary of the SM. Therefore, Scheduled Monument Consent will not be required.

EBC 1: Martello Tower 66 (scheduled monument, list entry: 1017356)

The coast path follows a well-used existing walked route over compacted shingle in this area. Natural England have clarified with Historic England the area covered by the SM and they have confirmed that there is a 2m buffer around the tower. The proposed route is outside of this buffer zone. We have not proposed any new infrastructure within the boundary of the SM. Therefore, Scheduled Monument Consent will not be required.

Undesignated archaeology

The Public Rights of Way Team at East Sussex County Council is responsible for both the establishment works and future maintenance of the proposed trail. They will consult the County Archaeologist, so that prior to carrying out any ground disturbance work, all necessary precautions, permissions, authorisations and consents are in place, to ensure any undesignated archaeology is unaffected by the proposed trail.

Conservation Areas

The Public Rights of Way Team at East Sussex County Council will liaise with the relevant local authority to ensure any Conservation Area requirements are fulfilled as part of the trail establishment.

The proposed route in Report EBC 1 does not pass through or close to any conservation areas.

Relevant appended documents (see section 5): $\ensuremath{\mathsf{N/A}}$

Representation number: MCA/EBC1/R/3/EBC0015

Organisation/ person making representation: Open Spaces Society – [Redacted]

Route section(s) specific to this representation: Map EBC 1c

Other reports within stretch to which this representation also relates: EBC 2, EBC 3, EBC 4, EBC 5, EBC 6, EBC 7

Representation in full

The OSS provided a covering letter, and also a representation form for each report.

a) Covering letter: 08 June 2020

Dear Natural England

Formal Representation: English Coastal Path - Eastbourne to Camber

I am responding on behalf of the Open Spaces Society to the Coastal Access Report for Eastbourne to Camber.

On behalf of the society, I would like to thank the Coastal Access Delivery Team for all the work that has gone into progressing of this section of the ECP.

I have been in consultation with representatives of the Ramblers when considering this matter and have made several site visits to the proposed route. The OSS is in total agreement with all the representations made on behalf of the Ramblers by [redacted]. The Society's representation forms accompanying this letter confirm this.

The society would like to state here its serious disappointment at the cessation of the path at the River Rother Estuary – stopping the path at Rye Harbour and then restarting at Camber Beach leaving an inexplicable gap.

The society considers this missing link in the English Coast Path at Rye to be a disgraceful neglect of Natural England's "legal duty to secure a walking route around the whole coast of England" and to keep interruptions to a minimum to the extent necessary to enable users to continue on their journey.

I must therefore refer you to, and highly commend, the detailed and carefully thought out proposal put forward by the Ramblers in their representation form EBC 7.

The society urges Natural England to revise the report to include this route so as to provide the public with a proper and continuous route at this location as intended by the legislation.

Thank you for this opportunity to make these representations.

[Redacted]

Open Spaces Society Wealden and Eastbourne [Redacted] oss.org.uk

b) Representation form:

Details and reasons are as per Ramblers' comments EBC 1. OSS endorses and concurs with the Ramblers' representation in full - please see OSS covering letter of 08 June 2020.

Natural England's comments

The OSS representation on EBC Report 1 replicates the views of the Ramblers. Please see Natural England's comments on the Ramblers representation MCA/EBC1/R/2/EBC0018 below.

Our comments regarding the River Rother are set out in our response to the representations received on EBC 7.

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

Representation number: MCA/EBC1/R/2/EBC0018

Organisation/ person making representation: Ramblers – [redacted]

Route section(s) specific to this representation:

Map 1c, Sovereign Harbour

Other reports within stretch to which this representation also relates: None

Representation in full

The Ramblers supports Natural England's proposals.

We would like to ensure that there is appropriate signage installed for the alternative route around the Sovereign Harbour basin. The alternative route is intended to be used when the lock

gates are open for a prolonged period of time, (20 minutes; twice a day). We would like to see an information board installed to inform walkers of this and the location of the alternative route. This should differentiate the primary and alternative routes but make clear to the public that both routes form part of the England Coast Path, to avoid confusion.

Natural England's comments

Natural England welcomes the Ramblers support of our proposals in this area.

Trail information signs have been included as part of our proposals on either side of the lock gates to inform walkers of the alternative route and when it is intended to be used. The main and alternative routes will be well waymarked on the ground to ensure walkers are aware of both routes and so that they are able to clearly differentiate between them.

We do not include waymarking signs and trail information signs on our report maps, but they are included as part of our proposals for this area.

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

Other representations

Representations containing similar or identical points

Representation ID Organisation/ person making representation:

MCA/EBC Stretch/R/3/EBC2338 [Redacted]

MCA/EBC Stretch/R/1/EBC2336 [Redacted]

Name of site: Whole stretch

Report map reference: All

Route sections on or adjacent to the land: All

Other reports within stretch to which this representation also relates EBC 2, EBC 3, EBC 4, EBC 5, EBC 6, EBC 7

Summary of point:

[Redacted] believes the path is a great idea – "well done – and thank you". He suggests it will be a great asset to the area and the people who use it. More walking paths are always a good thing. However he believes that it must also make accommodation for cyclists. He states that cycling is one of the greatest exercise activities we can undertake, and is so useful for all age ranges, from youngsters right through to older people. [Redacted] thinks the UK needs to encourage more cycling and provide more cycling opportunities whenever a new project is planned.

[Redacted]: I fully support this project. Please ensure the cycling facilities are kept too.

Natural England's comment:

We welcome the supportive comments made from [redacted] and [redacted].

The England Coast Path project comes under Part 9 of the Marine and Coastal Access Act 2009 ("the 2009 Act")1 which aims to improve public access to, and enjoyment of, the English coastline by creating clear and consistent public rights along the English coast for open-air recreation on foot. The coast path will generally follow existing public rights of way or promoted routes where these meet the coastal access criteria. Whilst the coast path is principally aimed at those on foot, wherever possible we do take into account other users, such as those with mobility issues, and we consider how we can maximise access for these groups.

The legislation does not intend the ECP to be a promoted cycle route and coastal access rights do not normally include provisions for cycling. However, this does not prevent such recreational uses taking place by virtue of an existing right, with the landowner's permission or by traditional tolerance such as a shared cycleway/walking path. In addition, Natural England may relax any of these national restrictions in specific areas with the consent of the owner, or an owner may also voluntarily provide such rights by making a permanent access dedication under section 16 of CROW.

We understand that Sustrans is looking into cycling opportunities, particularly in areas where road cycling has been raised as a concern by cyclists – for example between Pevensey and Cooden Bay (reports EBC 1-3), where the nature of the shingle foreshore makes coastal cycling difficult. Their investigations may lead to improved facilities for cyclists.

We are not proposing altering or removing any existing cycling facilities.

Relevant appended documents (see section 5): $\ensuremath{\mathsf{N/A}}$

Representation ID: MCA/EBC Stretch/R/4/EBC008

Organisation/ person making representation: [Redacted] - Disabled Ramblers

Name of site:

Report map reference: All, specific comment on EBC 1c

Route sections on or adjacent to the land: All

Other reports within stretch to which this representation also relates EBC 2, EBC 3, EBC 4, EBC 5, EBC 6, EBC 7

Summary of representation: Much of the route along this stretch follows shingle beach which can be difficult terrain for those with limited mobility, especially for those using mobility vehicles. However there are places here and there along the route where mobility vehicles should be able to go, and in these instances Natural England should ensure that, where ever possible, there are no man-made barriers that would prevent access. In a few instances it would be appropriate to sign short diversions (such as around the docks at Sovereign Harbour, Report ECB 1 sections ECB-1-S020 to EBC-1-S035). Disabled Ramblers requests that, where ever possible, Natural England adhere to the advice in the attached document Man-made Barriers and Least Restrictive Access.

Natural England's comment: We thank the Disabled Ramblers for their comments.

Report EBC 1 uses mostly existing promenades along this level section of coast which are generally suitable for those with limited mobility. We will ensure that signage for the Optional Alternative Route at Sovereign Harbour highlights that this route is also step-free, as opposed to the shorter, stepped route across the lock gates.

We welcome the guidance that the Disabled Ramblers have provided to Natural England. We will share this with East Sussex County Council, the relevant access authority for this stretch of coast, and have regard to any opportunities to further increase accessibility during the establishment stage of the coast path.

Relevant appended documents (see Section 5):

MCA/EBC Stretch/R/4/EBC008 Disabled Ramblers: Man-made Barriers and Least Restrictive Access.

Representation ID: MCA/EBC1/R/1/EBC1995

Organisation/ person making representation: [Redacted]

Name of site: Sovereign Harbour

Report map reference: EBC 1c

Route sections on or adjacent to the land: $\ensuremath{\mathsf{N/A}}$

Other reports within stretch to which this representation also relates $N\!/\!A$

Summary of representation:

[Redacted] queries details regarding the signing of the alternative route around Sovereign Harbour. This is intended to be used when the lock gates are open for a prolonged period of time, (20 minutes, twice a day). Will there be an information board that informs walkers of this and the location of the alternative route? Will the alternative route be signed in a manner that differentiates it from the main route?

Natural England's comment:

Trail information signs have been included as part of our proposals on either side of the lock gates to inform walkers of the alternative route and when it is intended to be used. The main and alternative routes will be clearly waymarked on the ground to ensure walkers are aware of both routes and so that they are able to clearly differentiate between them.

We do not include waymarking signs and trail information signs on our report maps, but they are included as part of our proposals in this area.

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

Length Report 3

Full representations

Representation number: MCA/EBC Stretch/R/2/EBC1939

Organisation/ person making representation: Historic England – [redacted]

Route section(s) specific to this representation: Whole Stretch, with specific comments about EBC1, EBC 4, EBC 5

Other reports within stretch to which this representation also relates: EBC 2, EBC 3, EBC 6, EBC 7

Representation in full See first occurrence of this representation under EBC1.

Natural England's comments

See Natural England's general comments at the first occurrence of this representation under EBC1.

Scheduled Monuments (SM) The proposals for report EBC 3 do not affect any Scheduled Monuments.

Conservation Areas

The proposed route in report EBC 3 does not pass through or close any conservation areas.

Relevant appended documents (see section 5):

N/A

Representation number: MCA/EBC3/R/2/EBC0015

Organisation/ person making representation: Open Spaces Society – [Redacted]

Route section(s) specific to this representation:

Map EBC 3a

Other reports within stretch to which this representation also relates:

EBC 1, EBC 2, EBC 4, EBC 5, EBC 6, EBC 7

Representation in full

See first occurrence of this representation under EBC1.

Natural England's comments

The OSS representation on EBC Report 3 replicates the views of the Ramblers. Please see Natural England's comments on the Ramblers representation MCA/EBC3/R/1/EBC0018 below.

Our comments regarding the River Rother are set out in our response to the representations received on EBC 7.

Relevant appended documents (see section 5):

N/A

Representation number: MCA/EBC3/R/1/EBC0018

Organisation/ person making representation:

Ramblers – [redacted]

Route section(s) specific to this representation:

Map 3a, EBC-3-S050 and EBC-3-S069

Other reports within stretch to which this representation also relates: None

Representation in full

It is not possible to walk the route between EBC-3-S053 and EBC-3-S066 during the high tide period. This is acknowledged in the report but the possible alternative route between EBC-3-S050 and EBC-3-S069 was rejected because it was deemed to be unsafe. There is a footpath along this stretch of Herbrand Walk, albeit narrow. It is alleged that illegal/inconsiderate parking on the pavement makes it unsafe to use. Rather than leaving Coast Path users with no safe route at high tide, we suggest that appropriate signage and infrastructure should be included in the Coast Path proposals to address the parking issue.

Natural England's comments

At route sections EBC-3-S015 to EBC-3-S068 between Herbrand Walk and Cooden Beach, public access may be interrupted from time to time for short periods by particularly high tides that occur during stormy conditions. Walkers may wait for a short time at the top of the beach until it is safe to pass. It is not possible to install an optional alternative route for use during these periods of tidal inundation.

Report EBC 3 outlines the various options we examined to provide either a continuous route or an optional alternative route between Herbrand Walk and Cooden.

We considered aligning both the trail and an optional alternative route on the pavement of Herbrand Walk (between sections EBC-3-S050 and EBC-3-S069 as mentioned in

the representation). To access this pavement, a route landward of a row of closely spaced beach huts, situated between sections EBC-3-S015 and S049, would be necessary. This strip of land does not have a pavement and is, in our view, too narrow and obstructed in places for pedestrians to safely pass each other without straying into the road carriageway. The adjacent highway is narrow and cars can travel at speed (it has a national speed limit of 60mph). East Sussex County Council Highways Safety Team advised that they would prefer that the coast path stayed on the seaward side of the run of beach huts, so that walkers are not encouraged to join this narrow road.

It is this part of Herbrand Walk 'verge' that will often have parked cars – however, addressing any parking infringement here would not be sufficient, in our view, to provide a safe and convenient route inland from the beach, due to the narrow width of this strip of land between the huts and the road.

We have therefore proposed a beach alignment with appropriate signage to advise walkers of the infrequent closure of the trail between Herbrand Walk and Cooden. This is likely to happen only with extreme high tides and stormy weather (mostly in winter when ECP walkers will be less frequent). Walkers will need to wait until the tide has fallen to continue safely along the beach.

Relevant appended documents (see section 5): None

Other representations

Representations containing similar or identical points

Representation ID Organisation/ person making representation:

MCA/EBC Stretch/R/3/EBC2338 [Redacted]

MCA/EBC Stretch/R/1/EBC2336 [Redacted]

Name of site: Whole stretch

Report map reference: All

Route sections on or adjacent to the land: All

Other reports within stretch to which this representation also relates EBC 2, EBC 4, EBC 5, EBC 6, EBC 7

Summary of point:

See first occurrence of this representation under EBC1.

Natural England's comments

See Natural England's comments at the first occurrence of this representation under EBC1.

Relevant appended documents (see section 5): $\ensuremath{\mathsf{N/A}}$

Representation ID: MCA/EBC Stretch/R/4/EBC008

Organisation/ person making representation: [Redacted] - Disabled Ramblers

Name of site:

All

Report map reference: All, specific comment on EBC1

Route sections on or adjacent to the land:

All

Other reports within stretch to which this representation also relates EBC 1, EBC 2, EBC 4, EBC 5, EBC 6, EBC 7

Summary of representation:

See first occurrence of this representation under EBC1.

Natural England's comments

See Natural England's general comments at the first occurrence of this representation under EBC1.

In this area, we explored a range of options such as using the carriageway and pavement of Herbrands Walk (north of sections EBC-3-S001 to S068) for our route, however East Sussex County Council Highways safety team advised that this was unsuitable due to road safety concerns. We also investigated options for a route landward of Herbrand Walk and the railway line, however were unable to find any suitable alternative route due to existing physical constraints and land use. As a result, this section of the proposed trail is aligned along the shingle beach.

Where our alignment utilises existing steps onto another, short section of shingle beach at Cooden (sections EBC-3-S073 to S079), we choose this route as a longer alternative option takes the route inland with no sea view. However, there is a step-free route available from EBC-3-S073, following highway pavements, to a ramp at Veness Gap, which joins a surfaced esplanade at EBC-3-S084.

Relevant appended documents (see section 5):

MCA/EBC Stretch/R/4/EBC008 Disabled Ramblers: Man-made Barriers and Least Restrictive Access.

Length Report 4

Representation number:

MCA/EBC Stretch/R/2/EBC1939

Organisation/ person making representation:

Historic England – [redacted]

Route section(s) specific to this representation:

Whole Stretch, with specific comments about EBC1, EBC 4, EBC 5

Other reports within stretch to which this representation also relates:

EBC 2, EBC 3, EBC 6, EBC 7

Representation in full

See first occurrence of this representation under EBC1.

Natural England's comments

See Natural England's general comments at the first occurrence of this representation under EBC1.

Scheduled Monuments (SM)

The proposals for report EBC 4 do not affect any Scheduled Monuments.

Carlisle Parade car park (grade II listed, list entry: 1400579)

Carlisle Parade Car Park grade II listed area is located at EBC-4-S042 Map 4g. The proposed trail is on the promenade which runs through the listed building area. This is a well-used area with current access, and we are not seeking to make any changes here to the area or proposing any new signs or other infrastructure. Any way-marking signs for the England Coast Path will be on existing signposts.

Conservation Areas

Our proposals, which have been shared with Rother District Council and Hastings Borough Council do pass through conservation areas in both Bexhill (EBC-4-S002 to EBC-4-S003) and in Hastings (EBC-4-S028 to EBC-4-S053). Within these areas, the route is aligned on existing walked paths and pavements. No infrastructure other than way-marking signs are proposed within the conservation areas and most of these will be attached to existing infrastructure. The Public Rights of Way Team at East Sussex County Council will liaise with the Rother District Council and Hastings Borough Council officers responsible for the conservation areas to ensure the design and the location of the signs are in keeping with these designations.

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

Representation ID MCA/EBC4/R/3/EBC0015

Organisation/ person making representation: Open Spaces Society – [Redacted]

Route section(s) specific to this representation: Map EBC4, map 4e and 4g

Other reports within stretch to which this representation also relates:

EBC 1, EBC 2, EBC 3, EBC 5, EBC 6, EBC 7

Representation in full

See first occurrence of this representation under EBC1.

Natural England's comments

We thank the Open Spaces Society for its comments on our proposals.

The OSS representation on EBC Report 4 replicates the views of the Ramblers. Please see Natural England's comments on the Ramblers' representation MCA/EBC4/R/1/EBC0018

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

Representation number: MCA/EBC4/R/1/EBC0018

Organisation/ person making representation: Ramblers – [redacted]

Route section(s) specific to this representation:

EBC-4-S001 to EBC-4-S006; EBC-4-S010; EBC-4-S022 to EBC-4-S023, EBC-4-S024; EBC-4-S027; EBC-4-S051

Other reports within stretch to which this representation also relates: None

Representation in full

Report EBC-4 map EBC4-e and EBC-4g

We are broadly supportive of Natural England's proposals but wish to make the following comments:

Section EBC-4-S001 to EBC-4-S006 is a marked cycle route (part of NCN2) as well as the promenade, which is not indicated in the table in section 4.3.1.

A few yards from the start of EBC-4-S010 (just east of the railway tunnel which leads to Ravenside shopping centre) there is a barrier at the side of the path which is signed 'Warning bad weather NCN2 route closed'. In times of bad weather, the barrier is placed in a position across the path closing it to cyclists, however there is nothing to indicate that pedestrians may still use the cycle path even when it is unsafe for cyclists. Hastings Borough Council is often late to re-open the barrier. Accurate signage will be needed here to assist users of the England Coast Path.

There are similar barriers between EBC-4-S022 (Bridge Way) and the start of EBC-4-S023, and at the start of EBC-4-S024. Further explanatory signage will be needed at these locations.

At the start of EBC-4-S027, for a distance of about 100 yards eastwards, the path is shared vehicular access to a car park adjacent to Sea Road, which is not indicated in the table in section 4.3.1.

It is most important that a clear way-mark is provided at the bottom of Tamarisk Steps at the start of EBC-4-S051 indicating the path route up to the East Hill.

Natural England's comments

Existing access status

We appreciate the comments on the status of existing access rights along the proposed alignment on Bexhill seafront and at Sea Road, Bulverhythe. The proposals map and Table 4.3.1 reflect our understanding of the 'highest' access rights along the proposed alignment, at the time of publication. On review, the Sustrans National Cycle Network route 2 *is* aligned on the main coast road at Bexhill, as shown on map 4a in yellow dots. However, we agree that the local council has provided cycle access along some of Bexhill's promenade, and that EBC-4-S006, identified as a public footpath on Map EBC 4b, also supports the NCN 2 and therefore has higher cycle rights.

At section EBC-4-S027, the proposed trail is aligned along a shared cycle path, marked out on this privately maintained car park access road.

We consider the existing status of all these sections does not alter the suitability of the proposals, and we will update our records accordingly.

Bad weather diversion of National Cycle Network 2

Between EBC-4-S010 and EBC-4-S024, the proposed pedestrian trail will follow a surfaced route. In bad weather, parts of this section can become temporarily strewn with shingle – making it less suitable/safe for cyclists using the NCN2. However, we consider the route safe and accessible to pedestrians during these conditions.

There is room for pedestrians to access the path at both ends of this section – even when the cycle barrier is in place during bad weather. We intend, as part of the proposals, to way-mark the pedestrian route clearly at these points – and consider this will provide sufficient clarity for walkers. We have discussed this issue with East Sussex County Council's Rights of Way team and they will review the situation and the need for further explanatory signage, if any concerns arise in the future.

Waymarking at Tamarisk Steps (section EBC-4-S051)

We can confirm that we will clearly identify the route across Rock-a Nore Road to Tamarisk Steps, as the steps are located in a narrow, easily missed, alleyway between buildings.

The route here is within the Old Town Conservation Area. Our proposals and infrastructure plans have been shared with Hastings Borough Council, and when East Sussex County Council prepare to establish the infrastructure, they will liaise with Hastings Borough Council Conservation Area officers to ensure that the design and location of way-marking is in keeping with this designation (as highlighted in para 4.2.20 of Report EBC 4).

Relevant appended documents (see section 5):

N/A

Other representations

Representations containing similar or identical points

Representation ID Organisation/ person making representation: MCA/EBC Stretch/R/3/EBC2338 [Redacted]

MCA/EBC Stretch/R/1/EBC2336

[Redacted]

Name of site:

Whole stretch

Report map reference: All

Route sections on or adjacent to the land:

All

Other reports within stretch to which this representation also relates EBC 2, EBC 3, EBC 4, EBC 5, EBC 6, EBC 7

Summary of point: See first occurrence of this representation under EBC1.

Natural England's comments

See Natural England's general comments at the first occurrence of this representation under EBC1.

Within Report EBC 4, much of the proposed alignment is along existing routes, with some formal or informal cycling provision – including the Sustrans National Cycle Network 2 between Bexhill and Hastings.

Relevant appended documents (see section 5):

N/A

Representation ID: MCA/EBC Stretch/R/4/EBC008

Organisation/ person making representation:

[Redacted] - Disabled Ramblers

Name of site:

All

Report map reference:

All, specific comments on EBC1

Route sections on or adjacent to the land:

Other reports within stretch to which this representation also relates EBC 1, EBC 2, EBC 3, EBC 5, EBC 6, EBC 7

Summary of representation:

See first occurrence of this representation under EBC1.

Natural England's comments

See Natural England's general comments at the first occurrence of this representation under EBC1.

In this Report, the proposed route is aligned largely along the promenade and combined cycleway between Bexhill and Hastings. This route is wide and level along the promenades and where the route crosses a shingle beach, there is surface treatment to suitable for use by cyclists and mobility vehicles.

There are some remaining constraints to easy access, including inclines along the combined walkway / cycleway at sections EBC-4-S010 to EBC-4-S013, and occasionally in winter, sections EBC-4-S010 to EBC-4-S026 may be impassable for mobility vehicles. In addition, in Hastings, the trail is aligned up steep steps between Rock-a Nore Road and Hastings Country Park (sections EBC-4-S050 to EBC-4-S053). Step-free access via roads is a significant detour inland, however, the nearby funicular railway can carry people to the Country Park without the use of steps.

Relevant appended documents (see section 5):

MCA/EBC Stretch/R/4/EBC008 Disabled Ramblers: Man-made Barriers and Least Restrictive Access.

Length Report 5

Full representations

Representation number:

MCA/EBC Stretch/R/2/EBC1939

Organisation/ person making representation:

Historic England – [redacted]

Route section(s) specific to this representation:

Whole Stretch, with specific comments about EBC1, EBC 4, EBC 5

Other reports within stretch to which this representation also relates:

EBC 2, EBC 3, EBC 6, EBC 7

Representation in full

See first occurrence of this representation under EBC1.

Natural England's comments

See Natural England's general comments on the first occurrence of this representation under EBC1.

Scheduled Monuments (SM)

The trail is aligned through the boundaries of the Iron Age Cliff Castle and site of St Georges Churchyard on East Hill Scheduled Monument. It follows an existing public footpath. We had considered installing one multi-finger post within the boundary of the SM, however in the interests of avoiding potential impacts on the historic site, we instead propose to install this sign outside the SM boundary. This will not affect the clear way-marking of the trail in this area.

Conservation Areas

In Report EBC 5, our proposed alignment, which has been shared with Hastings Borough Council and Rother District Council does pass through one conservation area: the Old Town Conservation Area in Hastings (EBC-5-S001 to EBC-5-S005). Within this area, the route mostly follows a well-used Public Right of Way within Hastings Country Park. The Public Rights of Way Team at East Sussex County Council will liaise with the HBC officers responsible for the conservation areas to ensure the design and the location of the signs are in keeping with this designation.

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

Representation number MCA/EBC5/R/13/EBC0015

Organisation/ person making representation: Open Spaces Society – [Redacted]

Route section(s) specific to this representation: Report EBC 5, Map EBC 5f, EBC-5-S001 to EBC-5-S043

Other reports within stretch to which this representation also relates: EBC1, EBC 2, EBC 3, EBC 4, EBC 6, EBC 7

Representation in full

See first occurrence of this representation under EBC1.

Natural England's comments

The OSS representation on EBC Report 5 replicates the views of the Ramblers. Please see Natural England's comments on the Ramblers representation MCA/EBC5/R/**10**/EBC0018

Our comments regarding the River Rother are set out in our response to the representations received on EBC 7.

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

Representation number MCA/EBC5/R/12/EBC0015

Organisation/ person making representation: Open Spaces Society – [Redacted]

Route section(s) specific to this representation:

Report EBC 5, 1) Map 5a Ecclesbourne Glen EBC-5 S006 to EBC-5-S-020, 2) Map 5e Fairlight Village EBC-5-S052 to EBC-5-S056

Other reports within stretch to which this representation also relates: EBC1, EBC 2, EBC 3, EBC 4, EBC 6, EBC 7

Representation in full

See first occurrence of this representation under EBC1.

Natural England's comments

The OSS representation on EBC Report 5 replicates the views of the Ramblers. Please see Natural England's comments on the Ramblers representation MCA/EBC5/R/11/EBC0018

Our comments regarding the River Rother are set out in our response to the representations received on EBC 7.

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

Representation number: MCA/EBC5/R/10/EBC0018

Organisation/ person making representation: Ramblers – [redacted]

Route section(s) specific to this representation: Map 5f Coastal margin EBC-5-S001 to EBC-5-S043

Other reports within stretch to which this representation also relates: None

Representation in full

The areas of Hastings Country Park with the status Coastal Margin are clearly marked on map 5f.

Recently Hastings Borough Council hurriedly passed byelaws that are now with DEFRA for scrutiny, proposing important changes to restrict public access area within the Country Park. *(reference 01). Although the present Park was formed in 1971, the local population have rights to roam dating back to 1833. *(reference.02)

Ramblers support Natural England's recommendations for spreading room and request that they and Defra ensure that public rights of access to the marked areas on map 5f are maintained and protected as described on map 5f.

*01.Hastingsonlinetimes.co.uk/hot-topics/home-ground/ *02 Hastings Chronicle.net re Hastings Country Park

Natural England's comments

The byelaws requested by Hastings Borough Council, for land at Hastings Country Park were confirmed by Defra on <u>8 January 2021</u>.

When making our coastal access proposals, Natural England has discretionary power to recommend that the landward boundary of coastal margin be extended in places to include further land within the coastal margin on the landward side of the trail (Coastal Access Scheme 2.3.6). However, we would not normally use our discretion to incorporate additional land within the coastal margin if the landowner disagreed with us doing so (Coastal Access Scheme 4.8.11).

We understood that HBC agreed with our proposals at Hastings Country Park and at the point of publication we were unaware of the potential for byelaws over this land. The landowner

alerted us, through a representation, that the proposed LCM boundary is not what they want and have asked that this be changed.

Therefore, in line with 4.8.11 of the Scheme, Natural England recommends to the SoS that he adjusts the relevant entries in Report EBC 5 (see section 5) to reflect the landowner's wishes and to satisfy the requirements for areas of LCM to be contiguous with the trail. This change would have no effect on the proposed alignment of the trail through the Country Park.

Relevant appended documents (see section 5):

MCA/EBC5/R/3/EBC0075 Hastings Borough Council:

- i.Natural England's revised table 5.3.1 Section Details: Maps EBC 5a to EBC 5e Tackleway, Hastings to Cliff End, Pett Level
- ii.Natural England's revised maps of proposed revision of Landward Coastal Margin: EBC 5a – 5d and EBC 5f: Hastings Country Park Coastal Margin

Representation number:

MCA/EBC5/R/9/EBC0018

Organisation/ person making representation:

Ramblers Association – [Redacted] Ramblers East Sussex Countryside Officer

Route section(s) specific to this representation:

Map 5a EBC-5-S006 to EBC-5-S018 Ecclesbourne Glen, Hastings Country Park

Other reports within stretch to which this representation also relates: None

Representation in full

Whilst accepting that for safety reasons the ECP route at Ecclesbourne Glen cannot go along the Saxon Shore Way between the points referred to above, the proposed route goes unnecessarily too far inland before turning south to rejoin the Saxon Shore Way. An alternative diversion nearer the coast would be much more acceptable.

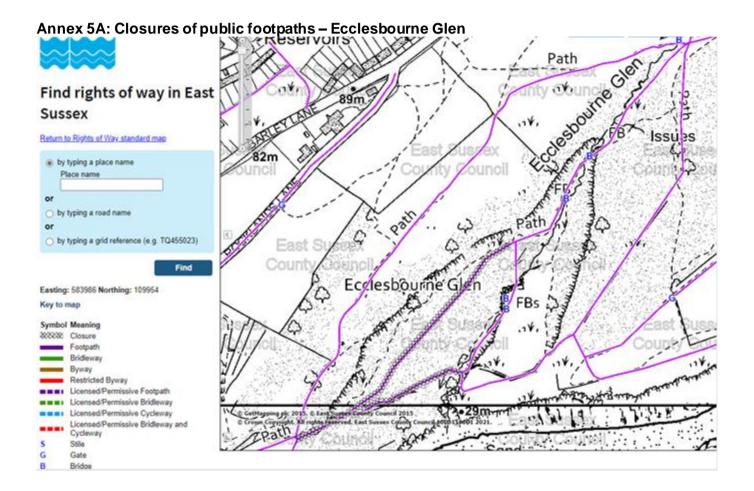
Natural England's comments

During the development of our proposals, we considered a number of route options in the vicinity of Ecclesbourne Glen, as the existing path across the seaward edge of the glen is currently closed, following landslips in 2013. These options are explained in table 5.3.2 Other options considered: Maps EBC 5a to EBC 5e.

A route through the glen, closer to the coast is not, in our view, practical. The terrain is steep on the western bank of the glen, and all the existing paths closer to the coast in this area have been closed by East Sussex County Council due to the landslips and unstable nature of the terrain (see Annex 5A: closures of public footpaths – Ecclesbourne Glen). Given these constraints on the western bank, we have aligned the trail further inland – along an existing, stable path, via a bridge at section EBC-5-S012 near the head of the glen. This alignment also provides some sea views.

If paths closer to the sea are reinstated in the future, Natural England would consider whether it was appropriate to submit a variation report to realign the ECP. In the meantime much (but not

all) of the areas seaward of the trail would legally be available as part of the coastal margin, even though they are not that convenient to access.



Representation number: MCA/EBC5/R/11/EBC0018

Organisation/ person making representation:

Ramblers – [redacted]

Route section(s) specific to this representation:

- 1) Map 5a Ecclesbourne Glen EBC-5 S006 to EBC-5-S020
- 2) Map 5e Fairlight Village EBC-5-S052 to EBC-5-S056

Other reports within stretch to which this representation also relates: None

Representation in full

1) EBC 5 map 5a EBC-5 S006 FP to EBC 5 S020

Ramblers support the proposed improvements to the path for accessibility and safety. However, we request further consideration is given to improving EBC-5-SO12 to SO13: when walked recently, the surface conditions both sides of the footbridge were extremely poor, deep mud and waterlogged. Erecting a section of boardwalk or compacted gravel infill with drains either side of the footbridge would significantly improve the situation.

Also the original clifftop path (Saxon Shore Way, where land slippage in 2013/14 led to the path being diverted), should be reinstated once the geological conditions are sufficiently stable. We understand that the only published geotechnical assessment into the landslips was carried out in 2014, so is now 6 years old but that further unpublished surveys been completed on behalf of Hastings Borough Council. We also understand that all decisions regarding the Saxon Shore Way have been made in consultation with ESCC Rights of Way Team and Natural England. We would like to see the previous closure of the Saxon Shore Way, between EBC-5-S006 and EBC-5-S019, and alignment of the coast path reviewed, as soon as possible in a transparent manner and based on up-to-date information. Ramblers recommend provision is made in the proposals for the Coast Path alignment to be varied as and when the footpath is reinstated, as proximity to the coast with sea views would be significantly improved.

2.) EBC 5 map 5e EBC-5-S052 to S056:

Ramblers recognise the need to route the path along residential roads within Fairlight Village as previous footpaths along the clifftop have been lost due to erosion.

Between S052 and S056 the footpath is quite narrow and boxed in on both sides with garden boundary fence panels. The footpath, frequently used by pedestrians, becomes very muddy and wet during winter months. Because the path is so narrow, users have no option other than to walk in the centre of the path which is often waterlogged.

Ramblers would like to see an improvement to the surface using compacted hardcore (or similar) to resurface. It may also be possible to install drainage for excess water.

Natural England's comments

EBC 5 map 5a, section EBC-5-S012 and EBC-5-S013

We are aware that sections of the proposed trail within Report EBC 5 suffer from muddy conditions in winter (see Accessibility paragraph 5.2.8 of the report) and have discussed the condition of this path with the relevant Access Authority (East Sussex County Council) and Hastings Borough Council, who manage the Country Park. The nature of the clay soil and the steep nature of the landscape within Hastings Country Park results in dry paths in the summer and temporarily waterlogged and muddy conditions during the winter. This affects many of the paths in the Country Park.

Sections EBC-5-S012 & S013 pass through a designated Special Area of Conservation and bryophyte-rich ghyll woodland Site of Special Scientific Interest. Large scale surfacing works / new drainage or the erection of boardwalks along EBC-5-S012 and EBC-5-S013 would involve works that could affect the stability of the area - with knock on impacts on the site's ancient woodland interest. However, in recent discussions with East Sussex County Council over the condition of this path, it has confirmed to us that it will continue to look for ways to improve localised drainage and waterlogging, along the England Coast Path and other public footpaths within the Country Park – in a way that is sensitive to the terrain and wildlife value of the site. Natural England will also provide information about the steep terrain and condition of the paths on the National Trails' website, so that walkers are able to decide in advance where they choose to visit.

EBC 5 map 5a, Saxon Shore Way closure

The closure of the Saxon Shore Way / public footpath across the seaward edge of Ecclesbourne Glen, due to landslips, is managed by East Sussex County Council. The current closure of this public footpath expires in November 2021 and we have been informed by ESCC that they are now actively investigating how to open it up. If the path is considered safe and stable enough to be re-instated and maintained in a safe manner on a long-term basis, Natural England will certainly consider submitting a variation report to realign the ECP closer to the sea to join sections EBC-5-S005 with EBC-5-S019.

In the meantime, we consider that, on balance, the proposed alignment between EBC-5-S006 and EBC-5-S019 is a satisfactory route that meets the principles of the England Coast Path as it provides a safe and continuous route close to the sea – as well as having some distant sea views.

EBC 5 map 5e, section: EBC-5-S052 to S056

We have discussed the condition of this public footpath with East Sussex County Council and agree that surface and drainage improvements are appropriate to provide a firmer walking surface. This improvement work will be included as part of the establishment of the trail, prior to opening.

Relevant appended documents (see section 5): None

Other representations

Representations containing similar or identical points

Representation ID Organisation/ person making representation:

MCA/EBC Stretch/R/3/EBC2338 [Redacted]

MCA/EBC Stretch/R/1/EBC2336 [Redacted]

Name of site: Whole stretch

Report map reference: All

Route sections on or adjacent to the land: All

Other reports within stretch to which this representation also relates EBC 2, EBC 3, EBC 4, EBC 5, EBC 6, EBC 7

Summary of point: See first occurrence of this representation under EBC1.

Natural England's comments

See Natural England's comments at the first occurrence of this representation under EBC1.

Relevant appended documents (see section 5):

N/A

Representations containing similar or identical points

Representation ID Organisation/ person making representation:

MCA/EBC5/R/4/EBC1953 [Redacted], Save Ecclesbourne Glen Group

MCA/EBC5/R/5/EBC2028 [Redacted], The Friends of Hastings Country Park

MCA/EBC5/R/1/EBC2339 [Redacted]

Name of site: Hastings Country Park Ecclesbourne Glen

Report map reference:

(a) Map EBC 5a - Tackleway, Hastings to Ecclesbourne Glen(b) Map EBC 5f - Hastings Country Park Coastal Margin

Route sections on or adjacent to the land:

EBC-5-S006 FP to EBC-5-S019 FP EBC-5-S001 to EBC-5-S043

Other reports within stretch to which this representation also relates $N\!/\!A$

Summary of point:

Conflict between proposed local byelaws and the open access Landward Coastal Margin

The representation raises concerns that Hastings Borough Council intends to implement new byelaws on land that would remove access rights from the proposed Landward Coastal Margin, which is at odds with the objectives of the England Coast Path to improve public access to the coast. Natural England and HBC had agreed the Landward Coastal Margin boundary and despite this, HBC now wants to restrict this by 35%. No explanation has been given by HBC to explain the extent and reasons for restricting the access rights in the proposed LCM and it is necessary to provide information describing the expected use and reasons for such a restriction. There is concern that the proper process has not been followed during byelaw consultation and during HBC Full Council approval. [Redacted] provides extensive supporting documentation that is appended to this document.

Natural England's comment:

The byelaws requested by Hastings Borough Council, for land at Hastings Country Park were confirmed by Defra on <u>8 January 2021</u>.

When making our coastal access proposals, Natural England has discretionary power to recommend that the landward boundary of coastal margin be extended in places to include further land within the coastal margin on the landward side of the trail (Coastal Access Scheme 2.3.6). However, we would not normally use our discretion to incorporate additional land within the coastal margin if the landowner disagreed with us doing so (Coastal Access Scheme 4.8.11).

We understood that HBC agreed with our proposals at Hastings Country Park and were not aware of the proposed byelaws at the time of publication. Byelaws are proposed and managed by the Local Authority and where byelaws exist they prevail over coastal access rights. The landowner alerted us, through a representation, that the proposed LCM boundary is not what they want and have asked that this be changed.

Therefore, in line with 4.8.11 of the Scheme, Natural England recommends to the SoS that he adjusts the relevant entries in Report EBC 5 to reflect the landowner's wishes and to satisfy the requirements for areas of LCM to be contiguous with the trail. This change would have no effect on the proposed alignment of the trail through the Country Park.

The relevant changes include the table entries in 5.3.1 Section Details: Maps EBC 5a to EBC 5e – Tackleway, Hastings to Cliff End, Pett Level between section EBC-5-S005 and EBC-7-S041, and revised LCM boundaries on maps EBC 5a-5c and EBC 5f: Hastings Country Park Coastal Margin (see Section 6).

Relevant appended documents (see Section 5):

MCA/EBC5/R/4/EBC1953: Save Ecclesbourne Glen Group – [redacted]'s supporting information [point 1]

MCA/EBC5/R/1/EBC2339: [Redacted] – map of overlap between proposed LCM and proposed Hastings BC byelaws

MCA/EBC5/R/3/EBC0075 Hastings Borough Council:

- i. Natural England's revised table 5.3.1 Section Details: Maps EBC 5a to EBC 5e – Tackleway, Hastings to Cliff End, Pett Level
- ii. Natural England's revised maps of proposed revision of Landward Coastal Margin: EBC 5a 5d and EBC 5f: Hastings Country Park Coastal Margin

Representations containing similar or identical points

Representation ID Organisation/ person making representation:

MCA/EBC5/R/4/EBC1953 [Redacted], Save Ecclesbourne Glen Group

MCA/EBC5/R/5/EBC2028 [Redacted], The Friends of Hastings Country Park

MCA/EBC5/R/2/EBC2341 [Redacted]

MCA/EBC5/R/7/EBC2342 [Redacted], Saturday Walkers Club

Name of site:

Hastings Country Park Ecclesbourne Glen

Report map reference:

(a) Map EBC 5a - Tackleway, Hastings to Ecclesbourne Glen(b) Map EBC 5f - Hastings Country Park Coastal Margin

Route sections on or adjacent to the land:

EBC-5-S006 FP to EBC-5-S019 FP EBC-5-S001 to EBC-5-S043

Other reports within stretch to which this representation also relates $N\!/\!A$

Summary of point: Reopen and use Footpath 417 across Ecclesbourne Glen.

The representations request that Natural England investigates the re-opening of footpath 417 (across the seaward edge of Ecclesbourne Glen) and uses that route for the trail alignment.

A number of concerns are raised over the process and decision making by East Sussex County Council and Hastings Borough Council in relation to closing and extending the closures of these footpaths, and highlight that no further landslips occurred here, even after the wet winter of 2019-20. For details of these concerns please see the supporting information from Save Ecclesbourne Glen Group ([redacted]), in section 5.

It is also noted that the public currently use the closed footpath along the coast.

[Redacted] provides detailed information regarding the footpath closure that are appended to this document.

Natural England's comment:

During the development of our proposals, we considered several route options in the vicinity of Ecclesbourne Glen, as the existing path across the seaward edge of the glen is currently closed, following landslips in 2013. These options are explained in table 5.3.2 Other options considered: Maps EBC 5a to EBC 5e. In developing our proposals, we always seek and consider the advice of the relevant Access Authority (East Sussex County Council) on the safety of existing rights of way. In this area, we consulted ESCC and HBC and took their advice to avoid the closed footpath. The process and decision making regarding the closure of a public right of way sits with the Access Authority, not with Natural England.

The current closure of the public footpath across the seaward edge of Ecclesbourne Glen runs from May 2020 to November 2021 and we have been informed by ESCC that they are now actively investigating how to open up this path, that would join section EBC-5-S005 with EBC-5-S019.

If the path is considered safe and stable enough to be re-instated and maintained in a safe manner on a long-term basis, Natural England will certainly consider submitting a variation report to realign the ECP closer to the sea to join section EBC-5-S005 with EBC-5-S019.

In the meantime, we consider that, on balance, the proposed alignment from EBC-5-S006 to EBC-5-S018 is a satisfactory route that meets the principles of the England Coast Path as it provides a safe and continuous route close to the sea – as well as having some distant sea views.

Relevant appended documents (see Section 5):

Save Ecclesbourne Glen Group - [redacted]'s supporting information [point 2]

Representation ID: MCA/EBC5/R/3/EBC0075

Organisation/ person making representation: [Redacted], Hastings Borough Council

Name of site: Hastings Country Park

Report map reference: EBC 5b

Route sections on or adjacent to the land:

Landward coastal margin EBC-5-S001 to EBC-5-S043

Other reports within stretch to which this representation also relates $N\!/\!A$

Summary of representation: Land has been included as coastal access land that is agricultural grazing land managed as active farmland under Higher Level Stewardship agreement. A map of the Coastal Access Active Farm Fields at Hastings Country Park is attached which shows the fields to be excluded from the coastal margin. As active farm fields there is no public access to those fields.

Natural England's comment:

When making our coastal access proposals, Natural England has discretionary power to recommend that the landward boundary of coastal margin be extended in places to include further land within the coastal margin on the landward side of the trail (Coastal Access Scheme 2.3.6). At the time of publication we believed that Hastings Borough Council supported the proposed Landward Coastal Margin, as we would not normally use our discretion to incorporate additional land within the coastal margin if the landowner disagreed with us doing so (Coastal Access Scheme 4.8.11).

In light of the representation, we have since agreed revised boundaries with Hastings Borough Council, which avoids areas where recently created byelaws exclude access, and covers land contiguous with the proposed trail. Please see the correspondence from Hastings Borough Council's, agreeing with this change, below (Annex 1).

In light of this representation from Hastings Borough Council, the landowner at Hastings Country Park, Natural England recommends that the SoS approve the amended report table 5.3.1 (relating to sections between EBC-5-S005 and EBC-5-S041) and maps EBC 5a – 5c and EBC 5f: Hastings Country Park Coastal Margin – as shown in Section 6. This change would have no effect on the proposed alignment of the trail through the Country Park.

Annex 1: Correspondence with Hastings Borough Council to confirm revised Landward Coastal Margin

From: [Hastings Borough Council] Sent: 27 May 2021 12:41 To: [Natural England] Subject: RE: England Coast Path - revised Landward Coastal Margin - final confirmation

'yes, Hastings Borough Council agrees that this is the favoured Landward Coastal Margin'

[Redacted] Environment and Natural Resources Manager Hastings Borough Council

Environment and Place Muriel Matters House Breeds Place Hastings TN34 3UY

From: [Natural England]
Sent: 27 May 2021 12:10
To: [Hastings Borough Council]
Cc: [Natural England]
Subject: RE: England Coast Path - revised Landward Coastal Margin - final confirmation Importance: High

[Redacted],

Thanks for your response below.

With reference my e mail sent yesterday which contained the revised landward coastal margin (LCM) boundary maps for Hastings Country Park (enclosed above), please can you or a colleague confirm that these revised maps are now correct by responding 'yes, Hastings Borough Council agrees that this is the favoured Landward Coastal Margin' (rather than no comment).

Once we have received as landowner your confirmation for the amended LCM boundary, we will then upd ate our GIS maps and update the Secretary of State with our proposals for the landward coastal margin for Hastings Country Park. I look forward to your response. Thanks in advance, [Redacted] [Redacted] Coastal Access Lead Adviser Sussex and Kent team Natural England

Relevant appended documents (see Section 5):

Hastings Borough Council - Active farm fields to be removed from coastal margin map

MCA/EBC5/R/3/EBC0075 Hastings Borough Council: HBC map showing areas to be removed from proposed Landward Coastal Margin

MCA/EBC5/R/3/EBC0075 Hastings Borough Council:

- i. Natural England's revised table 5.3.1 Section Details: Maps EBC 5a to EBC 5e – Tackleway, Hastings to Cliff End, Pett Level
- ii. Natural England's revised maps of proposed revision of Landward Coastal Margin: EBC 5a 5d and EBC 5f: Hastings Country Park Coastal Margin

Representation ID:

MCA/EBC5/R/6/EBC2342

Organisation/ person making representation:

[Redacted], Saturday Walkers Club

Name of site: Fairlight

Report map reference: Map EBC5e

Route sections on or adjacent to the land: Map EBC 5e, sections S050 - S062

Other reports within stretch to which this representation also relates None

Summary of representation: The proposed route is a 1km long inland diversion through Fairlight village with no view of the sea. The old coast path has "landslipped" down the cliff.

Maybe a new path down to, and then along 1) the beach or 2) half way down the cliff could be made. The path could then re-ascend the cliff at the far end of the bay. Another option is a low tide only route along the beach to Petts Level. Hastings Country Park is the only wild & hilly section of coast in the entire south east. While expensive to create, avoiding such a long inland diversion while creating access to an amazing sandy beach (with no current access) is justified.

Natural England's comment:

In developing our proposals for the National Trail, we consider the principles laid out in the Coastal Access Scheme – which include the safety, convenience and continuity of the trail.

The original public footpath along the clifftop at Fairlight has, as [redacted] points out, been eroded, and is no longer accessible. We understand the appeal of providing a route across the cliffs to the beach level at Fairlight, as suggested, however the friable and slumping nature of the cliffs would be inappropriate for a safe and maintainable path. In addition, these vegetated sea cliffs are of international conservation importance and a new path on the cliff face would be unlikely to be compatible with this special interest.

In light of these constraints, we considered that on balance the inland route, which mainly follows the existing Saxon Shore Way promoted path, best meets the need for a safe and continually accessible route. As a consequence of the cliff top trail, much of the open cliff slopes and beach will benefit from new coastal access rights, due to their location in the seaward coastal margin.

Relevant appended documents (see Section 5): None

Representation ID: MCA/EBC5/R/7/EBC2342

Organisation/ person making representation: [Redacted], Saturday Walkers Club

Name of site: Ecclesbourne Glen

Report map reference:

Map 5b

Route sections on or adjacent to the land:

EBC-2-S006 to EBC-2-S019

Other reports within stretch to which this representation also relates None

Summary of representation:

The path across the seaward edge of Ecclesbourne Glen could be made in such a way that it could be repaired each spring. Or there could be two routes, the original route for the more able, and the more accessible suggested inland diversion.

Natural England's comment:

In developing our proposals, we always seek and consider the advice of the relevant Access Authority (East Sussex County Council) on the safety of existing rights of way. In this area, we consulted ESCC and HBC and took their advice to avoid the closed footpath. The main concern over the path across the seaward edge of Ecclesbourne Glen has been the stability of the land (subject to landslips), rather than the steepness of the existing public footpath.

The current closure of this public footpath expires in November 2021 and we have been informed by ESCC that they are now actively investigating how to open it up. If the path is considered safe and stable enough to be re-instated and maintained in a safe manner on a long-term basis (we would want to avoid a cycle of ongoing repairs as [redacted] suggests), Natural England will certainly consider submitting a variation report to realign the ECP closer to the sea to join sections EBC-5-S005 with EBC-5-S019.

This route would involve many steps as each bank of the glen is very steep. If a Variation Report is developed, we will discuss whether informal signage could be provided to direct those with more limited accessibility onto a more level route, which would be inland of the coast.

In the meantime, we consider that, on balance, the proposed alignment between EBC-5-S006 and EBC-5-S019 is a satisfactory route that meets the principles of the England Coast Path as it provides a safe and continuous route close to the sea – as well as having some distant sea views.

Relevant appended documents (see Section 5): $\ensuremath{\mathsf{N/A}}$

Representation ID: MCA/EBC Stretch/R/4/EBC008

Organisation/ person making representation: [Redacted] - Disabled Ramblers

Name of site: All

Report map reference: All,

Route sections on or adjacent to the land:

Other reports within stretch to which this representation also relates

EBC 1, EBC 2, EBC 3, EBC 4, EBC 6, EBC 7

Summary of representation:

See first occurrence of this representation under EBC1.

Natural England's comments

We thank the Disabled Ramblers for their comments.

For those with limited mobility, the coast of Report EBC 5 has its challenges, as explained in paragraph 5.2.8 of the report. The nature of the clay soils and steep glens of Hastings Country Park makes the terrain rugged and difficult to access. However, East Sussex County Council and Hastings Borough Council also promote the Firehills area, at the eastern end of the park, to those with limited mobility, as there is an <u>accessible trail</u>, visitor centre, picnic facilities, car park and toilets.

We welcome the guidance that the Disabled Ramblers have provided to Natural England. We will share this with East Sussex County Council, the relevant access authority for this stretch of coast and Hastings Borough Council who manage Hastings Country Park. We will also have regard to any opportunities to further increase accessibility during the establishment stage of the coast path.

The rugged nature of the terrain in this area can also be highlighted on the National Trails' website which gives information on all National Trails, so that those with limited mobility are able to decide in advance where they choose to visit.

Relevant appended documents (see section 5):

MCA/EBC Stretch/R/4/EBC008 Disabled Ramblers: Man-made Barriers and Least Restrictive Access.

Length Report 6

Full representations

Representation number: MCA/EBC Stretch/R/2/EBC1939

Organisation/ person making representation: Historic England – [redacted]

Route section(s) specific to this representation: Whole Stretch, with specific comments about EBC1, EBC 4, EBC 5

Other reports within stretch to which this representation also relates: EBC 2, EBC 3, EBC 6, EBC 7

Representation in full

See first occurrence of this representation under EBC1.

Natural England's comments

See Natural England's general comments on the first occurrence of this representation under EBC1.

Scheduled Monuments (SM) The proposals for report EBC 6 do not affect any Scheduled Monuments

Conservation Areas

The proposed route in report 6 does not pass through or close any conservation areas.

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

Representation number: MCA/EBC3/R/2/EBC0015

Organisation/ person making representation: Open Spaces Society – [redacted]

Route section(s) specific to this representation: EBC6

Other reports within stretch to which this representation also relates: EBC 1, EBC 2, EBC 3, EBC 4, EBC 5, EBC 7

Representation in full

See first occurrence of this representation under EBC1.

Natural England's comments

The OSS representation on EBC Report 6 replicates the views of the Ramblers. Please see Natural England's comments on the Ramblers representation MCA/EBC6/R/1/EBC0018 below.

Our comments regarding the River Rother are set out in our response to the representations received on EBC 7.

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

Representation number: MCA/EBC6/R/1/EBC0018

Organisation/ person making representation: Ramblers – [redacted]

Route section(s) specific to this representation: EBC-6 Maps 6a, 6b, 6c EBC-6-S001 to EBC-6-S012 EBC-6-S020 to EBC-6-S029

Other reports within stretch to which this representation also relates: None

Representation in full

1. EBC-6 Map 6a -S001 to S004

The path is narrow along the cliff edge, with houses/gardens on one or both sides and some sea views. It is often very muddy and slippery but an attractive path. The Ramblers consider NE's proposal to install drainage channels and to resurface to be essential in making the path suitable for a National Trail.

2) EBC-6 Map 6a- S004 to S012 Pett Level Road with a junction to the north Pett Road, Chick Hill.

The road is narrow and traffic of all kinds including cars, buses, caravans, lorries and farm vehicles use the stretch, so it must be used with care. There are no pavements or designated refuges for pedestrians but it is a relatively short stretch and there is no suitable alternative.

The Ramblers would like to see the grassy verges kept short and tidy with appropriate signage for both walkers and drivers advising of the dangers and the correct side of the road to walk. A reduction in the speed limit would be helpful. Clear waymarking is required just before S013 indicating the footpath to the beach at S019.

3) EBC-6 Maps 6a, 6b, 6c. S020 to S029

Ramblers support Natural England's proposals from Pett Level to Dogs Hill at Winchelsea Beach.

Natural England's comments

We welcome the supportive comments provided from the Ramblers during the development of our proposals and for this representation for Report EBC 6.

1. EBC-6 Map 6a -S001 to S004

At Cliff End, sections EBC-6-S002 to EBC-6-S004 of this path are at a gradient and will be improved by the access authority (East Sussex County Council) before the trail is opened, as part of the establishment works. The resurfacing will provide an easier walking surface, with drainage to take water off the path surface, rather than flowing along it.

2. EBC-6 Map 6a- S004 to S012 Pett Level Road with a junction to the north Pett Road, Chick Hill.

The proposed trail in this area is aligned along the existing, promoted Saxon Shore Way long distance pedestrian route- which uses the narrow pavements and the 30mph carriageway of Pett Level Road.

During the development of the proposals, we liaised with East Sussex County Council over road safety here, including any measures that would improve the area for walkers and motorists.

We were advised to erect new standard 'pedestrians in road ahead' road signs close to sections EBC-6-S005 and EBC-6-S012 to warn drivers of the likely presence of walkers. The signs also include information which indicates over what distance there is no footway, with the wording "No footway for xxx yards/metres". These measures have been included in our proposals, and will be part of the establishment works undertaken by East Sussex County Council before the trail opens.

We were not advised that it would be necessary to mow the grassy verges or place multiple way-marking signs along this ~170m stretch of road, however the trail route will be clearly marked with waymark posts at important intersections. In addition, we will pass the Ramblers' suggestions onto East Sussex County Council as they maintain both the England Coast Path and highways verges.

3. EBC-6 Maps 6a, 6b, 6c. S020 to S029 Pett Level to Dogs Hill at Winchelsea Beach.

We welcome the supportive comments for the proposed trail along the sea wall between Cliff End and Winchelsea Beach.

Relevant appended documents (see section 5): None

Other representations

Representations containing similar or identical points

Representation ID Organisation/ person making representation:

MCA/EBC Stretch/R/3/EBC2338 [Redacted]

MCA/EBC Stretch/R/1/EBC2336 [Redacted]

Name of site: Whole stretch

Report map reference: All

Route sections on or adjacent to the land: All

Other reports within stretch to which this representation also relates EBC 1, EBC 2, EBC 3, EBC 4, EBC 5, EBC 7

Summary of point: See first occurrence of this representation under EBC1.

Natural England's comments

See Natural England's comments at the first occurrence of this representation under EBC1.

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

Representation ID: MCA/EBC Stretch/R/4/EBC008

Organisation/ person making representation: [Redacted] - Disabled Ramblers

Name of site: All

Report map reference: All,

Route sections on or adjacent to the land:

All

Other reports within stretch to which this representation also relates EBC 1, EBC 2, EBC 3, EBC4, EBC 5, EBC 7

Summary of representation:

See first occurrence of this representation under EBC1.

Natural England's comments

We thank the Disabled Ramblers for their comments.

For those with limited mobility, the coast of Report EBC 6 has its challenges, as the trail includes steps and is routed along a narrow path with a steep gradient between sections EBC-6-S001 to EBC-6-S004. This path is proposed to be resurfaced which will make it easier to use.

Access on the Pett Level sea wall (sections EBC-6-S024 to S031) is limited due to the narrow, shingle-based path on top of the wall. In addition, the physical constraints of this seawall, at the western end, means access is via steps rather than an easier ramp. However, there are some opportunities for less-able visitors to access the top of this sea wall, from locations along Pett Level Road (such as via a number of maintenance ramps). We will therefore look at opportunities to provide more information about accessibility here, by highlighting these ramp access points on the National Trail website.

We welcome the guidance that the Disabled Ramblers have provided to Natural England and we will share this with East Sussex County Council, the relevant access authority for this stretch of coast.

Relevant appended documents (see section 5):

MCA/EBC Stretch/R/4/EBC008 Disabled Ramblers: Man-made Barriers and Least Restrictive Access.

5. Supporting documents

MCA/EBC Stretch/R/4/EBC008 The Disabled Ramblers document: Man-made Barriers and Least Restrictive Access



Disabled Ramblers Ltd Company registered in England Number 05030316 Registered Office: 7 Drury Lane, Hunsdon, Ware, Herts SG12 8NU https://disabledramblers.co.uk

Registered Charity Number 1103508

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

<u>Mobility Vehicles</u>

 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.

- <u>Gaps</u> should be 1.1 minimum width on a footpath (BS5709:2018)
- Pedestrian gates The minimum clear width should be 1.1m (BS5709:2018)
- <u>Manoeuvring space</u> One-way opening gates need more manoeuvring space than two-way opening ones and some mobility vehicles may need a three metre diameter space
- <u>The ground</u> 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: <u>https://centrewire.com/products/easy-latch-for2-way-gate/</u> 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: <u>https://centrewire.com/?s=bristol</u>) 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: <u>https://centrewire.com/products/york-2in-1/</u> 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 <u>Centrewire Woodstock Large Mobility</u> 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 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

Representation No MCA/EBC5/R/4/EBC1953 Save Ecclesbourne Glen Group

The Save Ecclesbourne Glen Group submitted additional material in support of their representation which has been fully considered as part of the determination process. However, the material addresses issues which are not for Natural England or Defra to resolve through the England Coast Path and has therefore been redacted from publication on gov.uk.

MCA/EBC5/R/1/EBC2339 – Private individual, map of Hastings Country Park and landward coastal margin overlap

From: SM-NE-South East Coastal Access (NE) <[redacted]> on behalf of SM-NE-South East Coastal Access (NE) Sent on: Friday, March 13, 2020 11:08:17 AM To: [Redacted] Subject: EBC 2339 – [redacted]: Comment on proposals for Coastal Path section EBC5

Dear [redacted],

Thank you for your representation on our proposals for improving coastal access between Eastbourne and Camber.

This is to confirm that your representation was safely received and saved under customer reference number EBC 2339 and has been given the unique representation reference MCA/EBC5/R/5/EBC2339.

The representation you submitted will be summarised by Natural England and included in a report sent to the Secretary of State along with Natural England's comments. Natural England is required to send in full only those representations from organisations listed under paragraph 2(2)(b) - (f) of Schedule 1A to the National Parks and Access to the Countryside Act 1949; all other representations are summarised.

The Secretary of State must consider this and all other representations, along with Natural England's comments on them, in reaching a decision on the proposals set out in the relevant report.

Full details of the representations process can be found at: www.gov.uk/guidance/england-coast-path-comment-on-a-proposed-new-stretch

If you have any queries, please call our enquiry line on 0208 026 8045 or email your query to <u>southeastcoastalaccess@naturalengland.org.uk</u>

Yours sincerely

[Redacted] Coastal Access Team

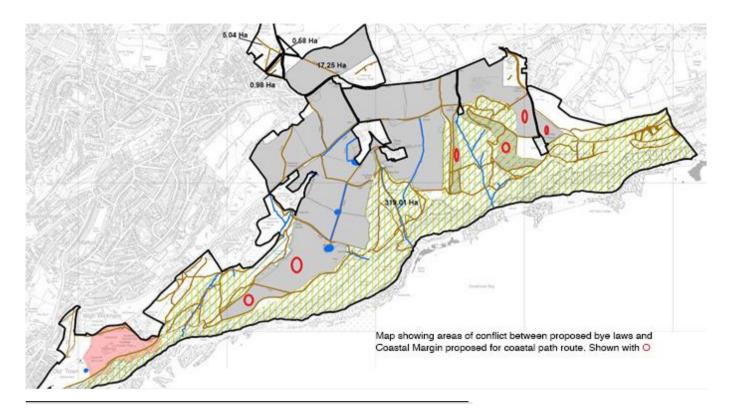
From: [Redacted] [mailto:[redacted]]
Sent: 10 March 2020 11:51
To: SM-NE-South East Coastal Access (NE) <SouthEastCoastalAccess@naturalengland.org.uk>
Subject: HPE CM: Comment on proposals for Coastal Path section EBC5

Good morning I have attached my comment on the proposed coastal path with related map.

Kind regards

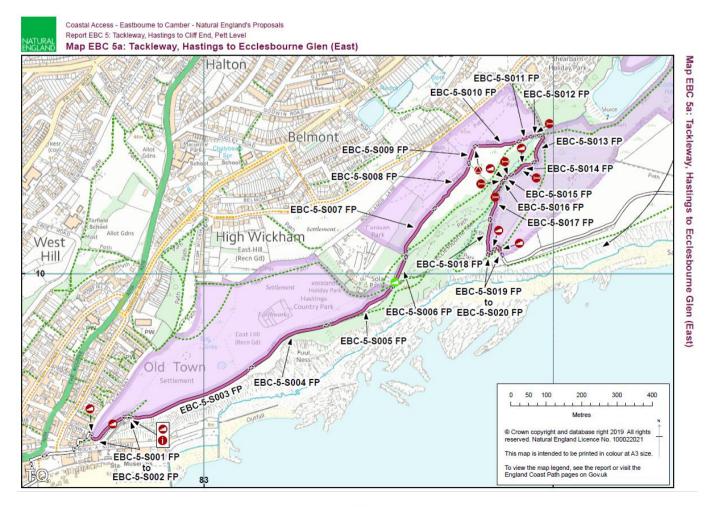
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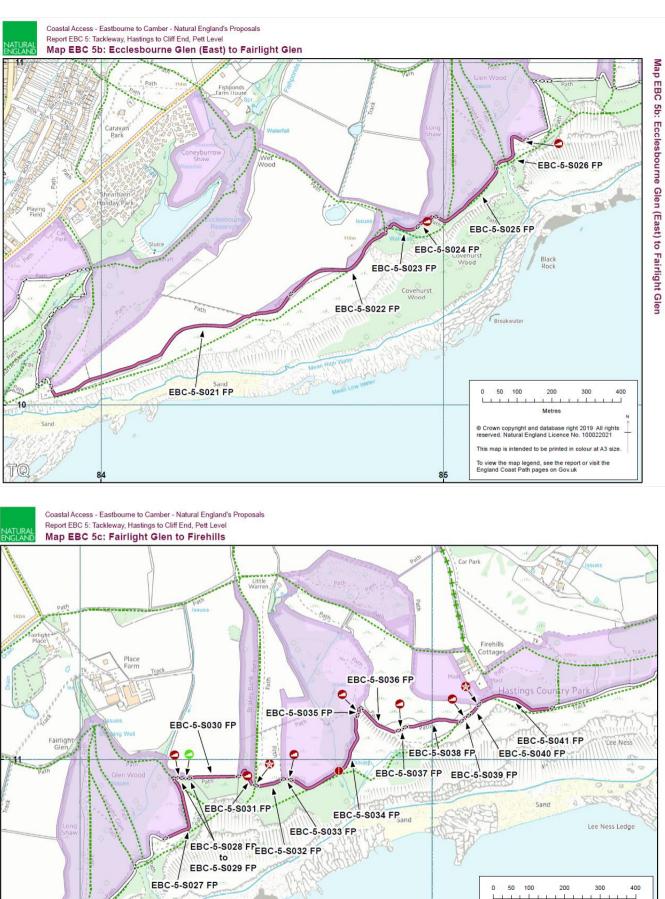
[Redacted]



MCA/EBC5/R/3/EBC0075 Hastings Borough Council: Natural England's revised proposals for the landward coastal margin

i. Natural England's revised maps of proposed revision of Landward Coastal Margin: EBC 5a – 5d and EBC 5f: Hastings Country Park Coastal Margin





Map EBC 5c: Fairlight Glen to Firehills

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To view the map legend, see the report or visit the England Coast Path pages on Gov.uk

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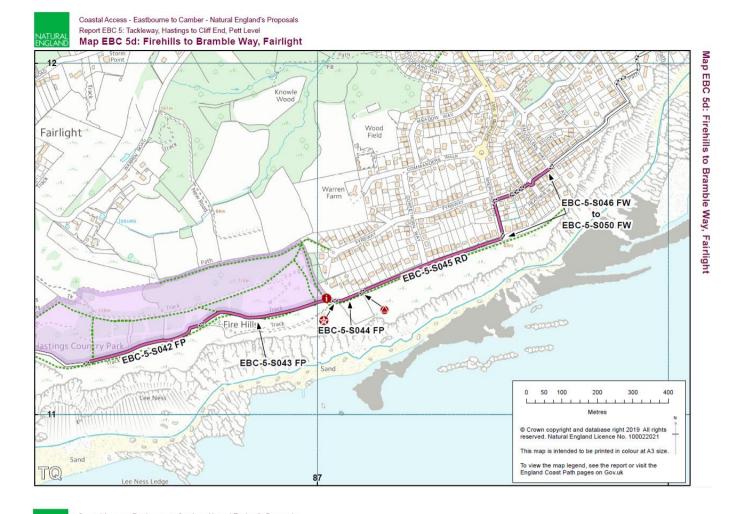
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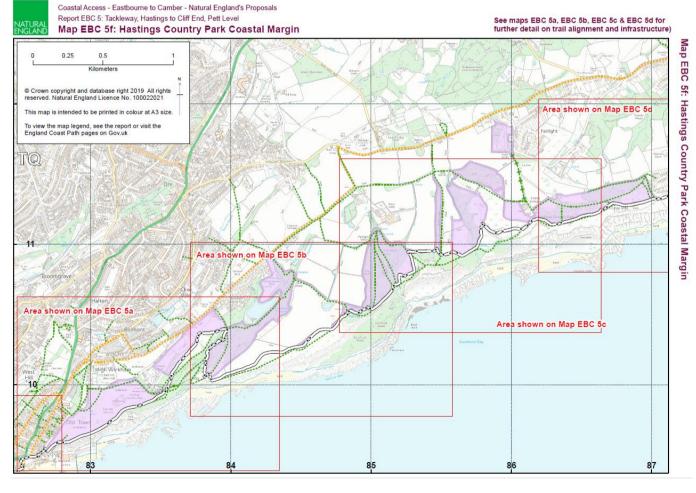
Black Rock

Covehurst Wood

85

TQ





i. Natural England's revised table 5.3.1 Section Details: Maps EBC 5a to EBC 5e – Tackleway, Hastings to Cliff End, Pett Level

Part 5.3: Proposals Tables (revised)

See Part 3 of Overview for guidance on reading and understanding the tables below

5.3.1 Section Details: Maps EBC 5a to EBC 5e – East Hill, Hastings to Cliff End, Pett Level

1	2	3	4	5a	5b	5c	6
Map(s)	Route section number(s)	Current status of route section(s)	Roll-back proposed? (see Part 7 of Overview)	Landward margin contains coastal land type?	Proposal to specify landward boundary of margin	Reason for landward boundary proposal	Explanatory notes
EBC 5a	EBC-5- S001 to S002	Public footpath	No	No	Wall	Additional landward area	
EBC 5a	EBC-5- S003 to EBC-5- S004	Public footpath	Yes - See table 5.3.3	No	Various	Additional landward area	Various means wall, grassland edge & woodland edge
EBC 5a	EBC-5- S005*	Public footpath	Yes - See table 5.3.3	No	Various	Additional landward area	Various means grassland edge, woodland edge & fence line
EBC 5a	EBC-5- S006 to EBC-5- S010*	Public footpath	Yes - See table 5.3.3	No	Road Various	Additional landward area	Various means fence line & hedge line
EBC 5a	EBC-5- S011 to EBC-5- S020*	Public footpath	Yes - See table 5.3.3	No	Various	Additional landward area	Various means fence line, woodland edge & fence line
EBC 5b	EBC-5- S021 to EBC-5- S022*	Public footpath	Yes - See table 5.3.3	No	Fence line	Clarity and cohesion	
EBC 5b	EBC-5- S023 to EBC-5- S024*	Public footpath	Yes - See table 5.3.3	No	Fence line	Additional landward area	
EBC 5b to EBC 5c	EBC-5- S025 to EBC-5- S029*	Public footpath	Yes - See table 5.3.3	No	Fence line	Additional landward area	
EBC 5c	EBC-5- S030*	Public footpath	Yes - See table 5.3.3	No	Fence line	Clarity and cohesion	

1	2	3	4	5a	5b	5c	6
Map(s)	Route section number(s)	Current status of route section(s)	Roll-back proposed? (see Part 7 of Overview)	Landward margin contains coastal land type?	Proposal to specify landward boundary of margin	Reason for landward boundary proposal	Explanatory notes
EBC 5c	EBC-5- S031*	Public footpath	Yes - See table 5.3.3	No	Fence line	Additional landward area	
EBC 5c	EBC-5- S032*	Public footpath	Yes - See table 5.3.3	No	Fence line	Clarity and cohesion	
EBC 5c	EBC-5- S033 to EBC-5- S035*	Public footpath	Yes - See table 5.3.3	No	Fence line	Additional landward area	
EBC 5c	EBC-5- S036 to EBC-5- S040*	Public footpath	Yes - See table 5.3.3	No			
EBC 5c	EBC-5- S041*	Public footpath	Yes - See table 5.3.3	No	Fence line	Additional landward area	
EBC 5d	EBC-5- S042 and EBC-5- S043	Public footpath	Yes - See table 5.3.3	No	Fence line	Additional landward area	
EBC 5d	EBC-5- S044*	Public footpath	Yes - See table 5.3.3	No	Fence line	Clarity and cohesion	
EBC 5d	EBC-5- S045*	Public highway	Yes - See table 5.3.3	No	Edge of track	Clarity and cohesion	
EBC 5d	EBC-5- S046 to EBC-5- S050	Public footway (pavement)	Yes - See table 5.3.3	No	Pavement edge	Clarity and cohesion	
EBC 5e	EBC-5- S051	Other existing walked route	Yes - See table 5.3.3	No	Edge of track	Clarity and cohesion	
EBC 5e	EBC-5- S052 to EBC-5- S056	Public footpath	Yes - See table 5.3.3	No	Fence line	Clarity and cohesion	
EBC 5e	EBC-5- S057	Other existing walked route	Yes - See table 5.3.3	No	Edge of track	Clarity and cohesion	
EBC 5e	EBC-5- S058	Other existing walked route	Yes - See table 5.3.3	No	Landward edge of road	Clarity and cohesion	
EBC 5e	EBC-5- S059	Other existing walked route	Yes - See table 5.3.3	No	Edge of path	Clarity and cohesion	
EBC 5e	EBC-5- S060 to EBC-5- S063	Public footpath	Yes - Normal	No	Fence line	Clarity and cohesion	

MCA/EBC5/R/3/EBC0075 - <u>Hastings Borough Council - Active farm fields to be removed from</u> coastal margin map

