

Coastal Access – Calshot to Gosport lengths CCG1 and CCG2



Representations with Natural England’s comments

November 2021

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1. Introduction

This document records the representations Natural England has received on the proposals in length reports CCG1 and CCG2 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 Calshot to Gosport they are included here in so far as they are relevant to lengths CCG2 and CCG3 only.

2. Background

Natural England’s compendium of reports setting out its proposals for improved access to the coast from Calshot to Gosport, comprising an overview and three separate length reports, was submitted to the Secretary of State on 17 July 2019. This began an eight-week period during which representations and objections about each constituent report could be made.

In total, Natural England received 18 representations pertaining to length reports CCG1 and CCG2, of which 10 were made by organisations or individuals whose representations must be sent in full to the Secretary of State in accordance with paragraph 8(1)(a) of Schedule 1A to the National Parks and Access to the Countryside Act 1949. These ‘full’ representations are reproduced in Section 4 in

their entirety, together with Natural England's comments. Also included in Section 4 is a summary of the eight representations made by other individuals or organisations, referred to as 'other' representations. Section 5 contains the supporting documents referenced against the representations.

3. Layout

The representations and Natural England's comments on them are separated below into the lengths against which they were submitted. Each length below contains the 'full' and 'other' representations submitted against it, together with Natural England's comments. Where representations refer to two or more lengths, they and Natural England's comments will appear in duplicate under each relevant length. Note that although a representation may appear within multiple lengths, Natural England's responses may include length-specific comments which are not duplicated across all lengths in which the representation appears. 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 CCG1

Full representations

Representation number:

MCA/CCG Stretch/R/1/CCG1626

Organisation/ person making representation:

The Solent Recreation Mitigation Partnership (*Bird Aware Solent*)

The Solent Recreation Mitigation Partnership is a partnership comprising of the fifteen Solent local authorities (some of whom are themselves in the "full" category as Access Authorities), Natural England, the Royal Society for the Protection of Birds, the Hampshire & Isle of Wight Wildlife Trust, and Chichester Harbour Conservancy. The Partnership for Urban South Hampshire (from 1st August 2019 known as the Partnership for South Hampshire) provide political governance for the Solent Recreation Mitigation Partnership. This response is submitted with their support and backing

Route section(s) specific to this representation:

Report CCG1, including Maps 1a to 1h and 1A, 1B and 1C

Other reports within stretch to which this representation also relates:

CCG 2 and CCG 3

Representation in full

As representatives of the SRMP partnership, we welcome the concept of the England Coast Path as something of value to local people and residents, but we have some real concerns that we would like addressing.

We recognise and thank you for your timely and inclusive approach to engaging with us during the development of a route for the ECP. As you are aware those parts of the Solent being identified as a potential route for the ECP are covered also by our mitigation programme, identified in our Strategy which was formally adopted by PUSH in December 2017 and replaces the interim Strategy we had been operating under since 2014.

We acknowledge the ECP team have consulted with us and hope that the ECP team have benefitted from SRMP partners' local knowledge and ecological expertise. We understand that this input has formed part of the evidence to define a route which does not lead to additional impacts on the Solent's SPA birds and their habitats. We appreciate that the proposed ECP route will need to satisfy the Habitats Regulations and that avoidance and mitigation may be required for the chosen route. This is in the same way that SRMP is a response to allowing development to proceed in satisfaction of those same regulations.

There are two specific areas of concern that have been expressed by partners that could potentially create conflict between the objectives of the two initiatives, outlined below.

Increased Visitor Numbers

Partners have expressed concerns that the ECP will lead to a rise in the number of visitors to sensitive parts of the coast. This will cause increased disturbance to the overwintering birds that journey to our SPAs, many of which are red and amber listed.

Whilst the SRMP is employing a range of measures to mitigate against disturbance from increasing housing numbers, it does not have the resources to deal with any further elevation in visitor numbers as a result of the ECP. Therefore there is a real concern of a conflict between these two initiatives. Any rise in visitor numbers as a result of ECP use has the potential to diminish the effectiveness of the SRMP measures. ECP will need to ensure that it provides its own mitigation package to protect against the impact of increased visitor numbers it will create.

Mapping of Spreading Zone

It is understood that in some areas of the ECP the spreading zone will be excepted for reasons of safety or nature conservation. Concern is raised about Ordnance Survey's plans for depicting the 'spreading zone' as a magenta wash and not making any exceptions for excepted areas.

As such, to an ECP user carrying an Ordnance Survey map it will appear that they are free/encouraged to walk on intertidal areas. In large parts of the SRMP area, these can be extremely large, support fragile habitats and be a huge food resource for birds and other species. Increased footfall through these areas would cause great damage to these fragile habitats and enormous disturbance to vulnerable wintering bird populations.

Whilst it is understood that exceptions to the spreading zone will be sign posted on the ground and listed on NE's website, enforcement of these would seem to fall to the landowner/occupier. If it is not possible to depict the spreading zone for the ECP accurately on Ordnance Survey maps, we would urge NE to reconsider its inclusion on the map entirely.

We are therefore seeking assurance from you about these two concerns in particular, rather than the more general issues you are already aware of and will be incorporating into the Access & Sensitive Features Appraisal

Natural England's comments

Increased visitor numbers

We understand the disturbance pressure affecting the Solent SPAs as a result of increasing demand for places to recreate from a growing population. Improving provision for walking, and particularly high quality, well maintained and promoted routes is one of a number of positive ways of managing demand.

Natural England maintains that over the course of developing our proposals for the England Coast Path between Calshot and Gosport we have thought carefully about possible impacts on the European sites and their associated designated features that could be affected. We have taken an iterative approach to developing and refining our access proposals, including thorough discussion with the SRMP and other organisations with relevant local knowledge, and are satisfied that sufficient measures are included to mitigate the risks. After careful consideration, we believe that the proposals we have made will not be likely to have a significant effect on a European sites that gives rise to the real risk of an adverse effect on its overall integrity. In reaching this conclusion, we have taken account of the relevant conservation objectives for the European sites involved and their ecological characteristics.

Our Habitats Regulations Assessment (see page 29, 'Bird Aware Solent', under 'D2. Contextual statement on the current status, influences, management and condition of the European Site and those qualifying features affected by the plan or project') states that:

"Proposals for coastal access have been made following a series of workshops and discussions with Bird Aware Solent representatives during which we have checked that detailed design of the access proposals is compatible with the Solent Recreation Mitigation Strategy and latest thinking on how it will be delivered, including site-specific infrastructure and awareness raising measures."

Our programme to establish the England Coast Path is complementary to the Partnership's strategy; it seeks to enable responsible access to the Solent coast and inform visitors about the ecological sensitivities. Through meetings and a series of workshops we have developed our proposals in close liaison with Bird Aware Solent and have fully considered the Bird Aware Solent evidence base and both the interim and definitive mitigation strategy. A key feature of the Bird Aware Solent strategy is the provision of coastal rangers to educate and inform coastal visitors about the wintering bird sensitivities and how to enjoy the site, whilst avoiding disturbing the feeding and roosting birds. Our proposals for the alignment and detailed design of the Coast Path complement the work of the rangers. The definitive strategy aims to widen the range of mitigation from the interim strategy through providing on-the-ground access management projects specific to each site, including measures such as interpretation panels. Although a definitive list of these projects has yet to be finalised, Bird

Aware Solent and Natural England colleagues have liaised to identify the likely projects that would be effective to reduce recreational disturbance in the Solent based on evidence.

Representatives of the ECP team have provided updates on the proposals to Bird Aware Solent meetings. These sessions have generated useful feedback which we have used in developing our proposals. This document has been developed in consultation with Natural England's staff involved in Bird Aware Solent.

Ongoing maintenance of the path and the associated mitigation measures have been considered within the Overview and individual reports for the stretch.

Mapping of Spreading Zone

How coastal margin is to be mapped on the OS maps does not form part of our proposals.

The decision as to how to depict on OS 1:25,000 maps the England Coast Path and the 'coastal margin' created on approved stretches by the Access to the Countryside (Coastal Margin) (England) Order 2010 resulted from detailed discussions with the Coastal Access National Stakeholder Group. This group, representing a balance of interests including user, conservation and land manager representative organisations, considered it imperative that the route of the England Coast Path and the coastal margin should both be depicted. This decision reflected the importance afforded by the stakeholder group to acknowledge the statutory duty to establish both a 'long distance walking route' around the coast of England and to identify a margin of land within which the public will also have access, subject to what follows.

Coastal margin will generally have, as a large component, land which is subject to coastal access rights but in some areas contains much land which is not subject to these rights. This may be because either it is excepted land, as set out in Schedule 1 of CROW, or because it is subject to statutory restriction.

It follows that, in contrast to the position with CROW 'open access land', the depiction of coastal margin on OS maps is not a depiction of 'access land' per se, but a depiction of the status of the land, rather as national park boundaries are depicted on the maps. This distinction was central to the decision to depict coastal margin distinctively on OS maps.

The depiction of coastal margin on OS digital and paper products with a magenta wash comes with a clear, concise explanation in the key: "All land within the 'coastal margin' (where it already exists) is associated with the England Coast Path and is by default access land, but in some areas it contains land not subject to access rights - for example cropped land, buildings and their curtilage, gardens and land subject to local restrictions including many areas of saltmarsh and flat that are not suitable for public access. The coastal margin is often steep, unstable and not readily accessible. Please take careful note of conditions and local signage on the ground"

The key also gives the link to the National Trails website <http://www.nationaltrail.co.uk/> which is the official source for information on the England Coast Path.

The new coastal access arrangements bring greater clarity on the ground about the rights of public access to coastal land.

It is in the interest of all parties that information regarding these new rights and about the new coastal margin designation is depicted accurately and consistently on OS maps, with appropriate explanation.

This approach to depicting the England Coast Path and coastal margin on OS maps has been in use since 2014. Natural England is unaware of any issues that have resulted in practice from this approach. This is despite the inclusion of some very substantial areas of developed or other excepted land with the magenta wash – for example:

- On the Isle of Portland, because of the need for the approved route of the ECP to cut across the north east corner of the island, the mapped coastal margin includes Portland Port, the Verne prison, houses, other buildings and their curtilage.
- On the Tees estuary, the coastal margin comprises extensive areas of industry and business interspersed with brownfield sites and areas where access rights are excluded to protect wintering birds

Relevant appended documents (see section 5): n/a

Representation number:

MCA/CCG Stretch/R/2/CCG0019

Organisation/ person making representation:

[Redacted] on behalf of The Ramblers

Route section(s) specific to this representation:

Whole report

Other reports within stretch to which this representation also relates:

CCG 2 and CCG 3

Representation in full

The Hampshire Ramblers are pleased to have been consulted during the process of developing proposals for the Calshot to Gosport stretch of the ECP. Unlike many ‘consultations’ that we are invited to take part in we believe that on this occasion there has been genuine interest in our points of view, even if it has not always been possible to accommodate them.

Our major Representations on this section are generally well-known to NE, but we nevertheless wish to put them on record.

Natural England’s comments

Natural England thanks the Ramblers’ for its constructive engagement with the Programme during the development of these proposals.

Relevant appended documents (see section 5): n/a

Representation number:

MCA/CCG Stretch/R/3/CCG0019

Organisation/ person making representation:

[Redacted] on behalf of The Ramblers

Route section(s) specific to this representation:

Whole report

Other reports within stretch to which this representation also relates:

CCG 2 and CCG 3

Representation in full

We note that in the text of the reports under 'Establishing the Trail' there are commitments for waymarking the Trail. Whilst walking the proposed route and using the published mapping we noted a number of locations where clear new signage is vital. This is particularly the case at a number of locations on the Calshot to Itchen Bridge section. In due course we wish to be involved with the details of signing the route.

Natural England's comments

We recognise the Ramblers' local knowledge and believe that the clarity & usability of the trail would benefit from continued liaison with this group during the establishment phase.

Our report proposes a number of interpretation panels and also commits us to properly signing new sections of path. The proposed general location of the interpretation panels are shown on the reports maps but we would appreciate the Ramblers' input when determining the precise installation locations of these panels and other waymarkers.

Relevant appended documents (see section 5): n/a

Representation number:

MCA/CCG Stretch/R/4/CCG1650

Organisation/ person making representation:

Hampshire Countryside Access Forum

Route section(s) specific to this representation:

Whole report

Other reports within stretch to which this representation also relates:

CCG 2 and CCG 3

Representation in full

HCAF has welcomed the excellent communications maintained by Natural England during the process of developing proposals for the Southampton Town Quay to Gosport stretch of the ECP. (The section from Calshot to the Hythe Ferry is covered by the New Forest Access Forum).

HCAF believes that the consultation process has been very effective and should stand as an example to others.

During this process our discussions have frequently turned to the two areas where HCAF have some concerns, therefore our Representations are expected to be familiar to NE.

Natural England's comments

Natural England welcome the HCAF's support during the development of our proposals.

Relevant appended documents (see section 5): n/a

Representation number:

MCA/CCG1/R/1/CCG1648

Organisation/ person making representation:

New Forest Local Access Forum

Route section(s) specific to this representation:

Map CCG 1a. Map CCG 1b. Map CCG 1c. Map CCG 1d. Map CCG 1e. Map CCG 1f.

Other reports within stretch to which this representation also relates:

n/a

Representation in full

- We support the selection of CCG-1 S001, now a public footpath, over the alternative CCG-1 OA001 to CCG-1 OA007 (Tom Tiddlers) as the feeling of CCG-1 S001 is much more coastal. It is also of benefit that the alternative will be used during high tides and that suitable signage will inform people of which is the most suitable trail to use.
- We are glad that Natural England staff have consulted with the Fawley development and that there is flexibility in the route which can align itself upon more suitable paths described in the development plans if/when these plans are realised.
- We support the selection of CCG-1 S007 FP to CCG-1 S011 FP over the alternative CCG-1 OA008 to CCG-1 OA009 (Ashlet Creek) as the connection to the coast via views and historic environment strongly outweigh the alternative path.
- We are pleased that you have taken on board our suggestion to have All Saint's Church in Fawley as part of the route.
- As you mentioned in your report, we are disappointed that a route could not be found through the Exxon Mobile oil refinery. The section that skirts this area means that walkers will have three miles/five kilometres of walking through residential areas that do not have any coastal flavour. We understand that the public safety aspects of finding a more seaward route through an active oil refinery are extremely complicated.
- The path along the back of Kennels Row is superior to the proposed route CCG-1 S029 but again safety considerations must be given in lieu of the security personnel who use the track and actually neither option gives a coastal feel.
- We support the proposed areas of excepted land. Views over this sensitive habitat are provided by the route and it is important that such disturbance in such areas is reduced to as little as possible. Having said that the 'magenta wash' issue could still put those habitats at risk of further disturbance, cause confusion for walkers and create signpost clutter in the countryside.

- We welcome the use of Hythe ferry as part of the England Coast Path and hope that Natural England provide sufficient funding to keep this car free and sustainable route into the National Park open.

We would like to thank members of the Natural England Coast Path team for their engagement and professionalism whilst attending our meetings and in keeping us updated on the various developments and providing opportunities to comment.

Natural England's comments

Natural England welcome the New Forest Local Access Forum's support and observations relating to the proposed route alignment. We are grateful for their comments regarding our engagement with them.

The LAF states its support regarding our proposed "excepted land". For avoidance of doubt, we take this to mean the directions to exclude access that we have proposed under Part 1, chapter 2 of the CROW Act.

In response to the LAF's comments about 'magenta wash', please see our comments above relating to The Solent Recreation Mitigation Partnership's representation (*Bird Aware Solent*) - MCA/CCG Stretch/R/1/CCG1626 at Mapping of Spreading Zone.

Relevant appended documents (see section 5): n/a

Representation number:

MCA/CCG1/R/3/CCG1628

Organisation/ person making representation:

New Forest National Park Authority

Route section(s) specific to this representation:

Map CCG 1a, Map CCG 1b, CCG-1-S001

Other reports within stretch to which this representation also relates:

n/a

Representation in full

The New Forest National Park Authority supports the selection of CCG-1 S001, the new public footpath, over the alternative CCG-1 OA001 to CCG-1 OA007 as it passes over Tom Tiddlers. The feeling of the proposed route CCG-1 S001 is much more coastal giving the opportunity to view the coast heritage and the solent seascape. The option of a signed alternative path during high tides will also be of significant value.

The New Forest National Park Authority supports the selection of CCG-1 S007 FP to CCG-1 S011 FP over the alternative CCG-1 OA008 to CCG-1 OA009 (Ashlet Creek) as the connection to the coast via views and historic environment strongly outweigh the alternative path through thick scrub land.

Natural England's comments

Natural England welcome the new Forest national Park Authorities support for the proposed route alignment at the above locations.

Relevant appended documents (see section 5): n/a

Other representations

Representation ID:

MCA/CCG Stretch/R/5/CCG1619

Organisation/ person making representation:

Solent Protection Society

Name of site:

CCG 1 whole report

Report map reference:

Maps CCG 1a to CCG 1h

Route sections on or adjacent to the land:

Other reports within stretch to which this representation also relates

CCG 2 and CCG 3

Summary of representation:

The Solent Protection Society (SPS) supports the proposals and is pleased with the links that have been proposed to join up various sections of path and create a more continuous route. It hopes that NE will monitor options to align closer to the coast at Fawley Oil Refinery should circumstances change. It also notes that the small detours required on the eastern shore of Southampton Water at Netley and the Holiday Park are a pity.

SPS accepts that the best of the three options has been chosen at the three estuary crossings.

SPS supports the proposed S25A designations proposed throughout the route to exclude the public from the seaward coastal margin. Although these directions are given because the saltmarsh/flat is unsuitable for public access, it notes the knock-on effect these directions will have in protecting important wildlife sites. SPS hopes that adequate signage is proposed along the route to inform the public of the exclusions and that in critical areas fencing is proposed to physically restrict public and particularly dog access. They say that this will be important if the proposed Fawley Waterside development takes place which will put increased pressure on the path and its margins at the south west corner of the route. They strongly support the path going on the seaward side of the proposed development.

Natural England's comment:

Natural England acknowledge these comments in response to our stretch proposals, and are grateful for the statements of support. We have proposed to install interpretation panels to inform users of the local environmental sensitivities and in certain places the use of seasonal fencing to guide walkers and dogs away from the most sensitive areas.

The locations of these panels are at: -

- The start of the length at CCG-1-S001
- Junctions of CCG-1-A008, CCG-1-S001 and CCG-1-S002
- Junctions CCG-1-A009, CCG-1-S011 and CCG-1-S012 at Ashlett Quay

Relevant appended documents (see Section 5): n/a

Representation ID:
MCA/CCG1/R/5/CCG0008

Organisation/ person making representation:
The Disabled Ramblers

Name of site:
CCG 1 whole report

Report map reference:
CCG 1a, 1b, 1e

Route sections on or adjacent to the land:

Other reports within stretch to which this representation also relates
CCG 2 and CCG 3

Summary of representation:

The Disabled Ramblers are concerned that Natural England, in the Accessibility statement 1.2.10 and 1.2.11 in Report CCG1: Calshot to Itchen Bridge has not recognised that there is a significant and steadily increasing number of people with reduced mobility who use off-road mobility scooters and other mobility vehicles to enjoy routes on more rugged terrain.

They request that NE takes all reasonable steps to make the trail as easy as possible for disabled people and those with reduced mobility and be mindful of British Standard BS5709:2018 Gaps Gates and Stiles and reconsider suitability of existing infrastructure indicated as being retained because in many cases this bars legitimate access for this group of people.

Natural England's comment:

Section 4.3 of the Scheme – 'Adjustments for disabled people and others with reduced mobility' guides our approach to aligning the trail to ensure that it is as inclusive as possible.

"4.3.8 We follow the principles set out in our publication "By All Reasonable Means" to make the trail as easy to use as we reasonably can for disabled people and others with reduced mobility, whilst accepting that such opportunities will often be constrained by practical limitations, such as the rugged nature of the terrain or the availability of visitor transport and facilities (see section below). Where there is a choice of routes (after taking into account all the key principles in chapters 4 and 5 of the Scheme), we favour the one that is accessible to the widest range of people or most easily adapted for that purpose.

4.3.9 Throughout the trail, we avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances. For example, where we install infrastructure in preparation for the introduction of the rights (or replace existing infrastructure, once it has reached the end of its useful life) we normally use:

- *gaps to cross field boundaries where livestock control is not an issue;*
- *gates rather than stiles where livestock will be present, designed to enable access by people with wheelchairs; and*
- *graded slopes rather than steps if practicable.*

4.3.10 *Where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility. This may include improvements to the information available about those lengths of trail that are already accessible to a wide range of people. We also ask local representatives to help us identify, prioritise and design suitable and affordable physical improvements to the trail according to their local needs and the available budget. They might typically identify:*

- *particular sections of trail that are well-served by public transport and visitor facilities, but have physical barriers to access for people with reduced mobility which could realistically be removed; or*
- *sections with potential to provide key strategic links through adjustments that are readily achievable.*

4.3.11 *In all this, we will have regard to any concerns about making it easier in practice for people to enter land unlawfully with vehicles; the importance of conserving cultural heritage features and landscape character in the design of the trail and infrastructure; land management needs, for example the need for crossing points to be designed to prevent livestock from escaping; the costs involved; and the need for crossing points between fields to facilitate access for horse riding or cycling where there are existing rights or permissions for these activities.”*

Our proposals for CCG 1 include locations where the new or retained infrastructure may restrict access to those with reduced mobility for example:

- A bridge retained at CCG-1-S003. This is on a popular public right of way and is a significant structure over the water channel access into the Fawley Power Station. At exit and egress there are steps and metal gates through which users access to cross the channel.
- The bridge at CCG-1-A006 on the ‘Optional Alternative’ route is to be replaced, however access and egress are limited due to the narrow public right of way at this location.
- Access and egress to the Itchen Bridge is by way of steep staggered steps.

There is no scope to widen the bridges and paths due to the inherent physical constraints of this area

In drawing up our proposals we have taken all reasonable steps to make the trail as easy as possible for disabled people and those with reduced mobility and been mindful of British Standard BS5709:2018 Gaps Gates and Stiles. In certain places we have been able to make targeted adjustments to make the trail more accessible for people with reduced mobility:

- At CCG-1-S008 and CCG-1-S010 new pedestrian gates will be installed because the current gates are in disrepair. The new gates will be wider to ensure they are accessible for those with reduced mobility

Relevant appended documents (see Section 5):

Photos at section 5.1

Representation ID:
MCA/CCG1/R/4/CCG0126

Organisation/ person making representation:
New Forest District Council

Name of site:

Report CCG 1: Calshot to Itchen Bridge

Report map reference:

Maps CCG 1a, CCG 1b, CCG 1c, CCG 1d, CCG 1e, CCG 1f

Route sections on or adjacent to the land:**Other reports within stretch to which this representation also relates**

n/a

Summary of representation:

NFDC thanks Natural England for its inclusive approach during the development of this stretch. They have an interest in the route as a land owner and as a planning authority.

As a landowner, the District Council does not have any objections to the proposed route.

As a local authority, the District Council fully supports the inclusive and evidence-based approach taken by Natural England and the report's (Report CCG 1) recommendations for the implementation of the England Coast Path between Calshot and the Itchen Bridge.

However, the Council does have concerns that the ECP will lead to a rise in the number of visitors to sensitive parts of this length of coast, thus causing increased disturbance to protected European sites. However they note that environmental protection objectives were taken into account in the development of the proposals and that these have been subject to the HRA process.

Natural England's comment:

Natural England acknowledge these comments and observations in response to our stretch proposals, and are grateful for the statements of support.

Relevant appended documents (see Section 5): n/a

Representation ID:

MCA/CCG1/R/2/CCG0097

Organisation/ person making representation:

[Redacted]

Name of site:

Calshot to Gosport Nature Conservation Assessments (Does not appear to have a number)
Table 8

Report map reference:

CCG 1

Route sections on or adjacent to the land:

CCG-1-S046
SSSI Units 181 to 183

Other reports within stretch to which this representation also relates

n/a

Summary of representation:

The conclusions reached in Table 8 are not correct and therefore Units 181 to 183 need protection by designation as excluded land. There is field entrance in the fence which has no gate and is only “protected” by a low level concrete block intended to prevent vehicle access. The fencing can be circumvented at the north end.

Natural England’s comment:

As a result of Mr Cox’s representation, Natural England met with Mr Cox at the referenced location on 28th August 2019. We visited the site he mentions where there is a gap in the existing fence and vegetation blocked by a low lying large concrete block. The fence is in a poor state of repair and we understand from Mr Cox that there used to be a gate at this point.

This gap sits on the northern seaward side of the proposed trail, the SSSI is immediately seaward of the trail. In our assessment of possible impacts on the SSSI we noted that there is a fence between the site and the proposed route for the Coast Path (see Page 13 of ‘Natural England’s Nature Conservation Assessment for Coastal Access Proposals between Calshot and Gosport’). Mr Cox points out that it is possible to enter the site through the gap.

In discussion with Mr Cox it was determined that access to the SSSI would not be attractive to walkers due to the neighbouring fencing, scrub and trees barring access and the unattractiveness of the land beyond. There is also no access to the coast through this site. In addition we learned that access was mostly locals who would pick blackberries.

On entering the site, over the concrete block, we found a damaged ‘No entry’ sign and a faint desire line leading through narrow scrub and brambles to large blackberry bushes. There appeared to be no further desire lines leading further into the SSSI. Such low level use does not appear to be having a detrimental impact on the SSSI, but we agree with Mr Cox that repairs to the fence should be made.

In light of our visit on the 28th August, our Nature Conservation Assessment of these SSSI units still stands. However in light of the gap in the fence and tree line, at establishment we will discuss making repairs to the fence with the local authority and landowner.

Clear signage and way marking supported by the fact the trail is aligned along a clear and defined track mean that it is unlikely walkers following the Coast Path will leave the trail and enter the SSSI at this point.

Relevant appended documents (see Section 5):

Extract from natural England’s Nature Conservation Assessment at 5.2

Photos of access point at 5.3

Length Report CCG2

Full representations

Representation number:

MCA/CCG Stretch/R/1/CCG1626

Organisation/ person making representation:

The Solent Recreation Mitigation Partnership (*Bird Aware Solent*)

The Solent Recreation Mitigation Partnership is a partnership comprising of the fifteen Solent local authorities (some of whom are themselves in the “full” category as Access Authorities), Natural England, the Royal Society for the Protection of Birds, the Hampshire & Isle of Wight Wildlife Trust, and Chichester Harbour Conservancy. The Partnership for Urban South Hampshire (from 1st August 2019 known as the Partnership for South Hampshire) provide political governance for the Solent Recreation Mitigation Partnership. This response is submitted with their support and backing

Route section(s) specific to this representation:

Report CCG1, including Maps 1a to 1h and 1A, 1B and 1C

Other reports within stretch to which this representation also relates:

CCG 2 and CCG 3

Representation in full

See first occurrence of representation under CCG1.

Natural England’s comments

See first occurrence of Natural England’s comments under CCG1.

Relevant appended documents (see section 5): n/a

Representation number:

MCA/CCG Stretch/R/2/CCG0019

Organisation/ person making representation:

[Redacted] on behalf of The Ramblers

Route section(s) specific to this representation:

Whole report

Other reports within stretch to which this representation also relates:

CCG 2 and CCG 3

Representation in full

See first occurrence of representation under CCG1.

Natural England’s comments

See first occurrence of Natural England’s comments under CCG1.

Relevant appended documents (see section 5): n/a

Representation number:

MCA/CCG Stretch/R/3/CCG0019

Organisation/ person making representation:

[Redacted] on behalf of The Ramblers

Route section(s) specific to this representation:

Whole report

Other reports within stretch to which this representation also relates:

CCG 2 and CCG 3

Representation in full

See first occurrence of representation under CCG1.

Natural England's comments

See first occurrence of Natural England's comments under CCG1.

Relevant appended documents (see section 5): n/a

Representation number:

MCA/CCG Stretch/R/4/CCG1650

Organisation/ person making representation:

Hampshire Countryside Access Forum

Route section(s) specific to this representation:

Whole report

Other reports within stretch to which this representation also relates:

CCG 2 and CCG 3

Representation in full

See first occurrence of representation under CCG1.

Natural England's comments

Natural England welcome the HCAF's support during the development of our proposals.

Relevant appended documents (see section 5): n/a

Representation number:

MCA/CCG2/R/8/CCG1650

Organisation/ person making representation:

Hampshire Countryside Access Forum

Route section(s) specific to this representation:

Hamble to Warsash Ferry (The Pink Ferry)

Maps CCG 2e and 3a

Other reports within stretch to which this representation also relates:
CCG 3

Representation in full

We note the discussion of options for the River Hamble estuary presented on page 21 of the Overview report.

In line with other local opinion, HCAF does not believe that the reliability of the Pink Ferry is such that 'continuity of access' to the continuous coastal route will be sufficiently guaranteed. This is a core objective of the ECP.

We consider that the Hamble Ferry provides a useful alternative when it is available, but by using it the route misses a great deal of potential for enhancing coastal access.

HCAF agrees with the view expressed by the Hamble River Valley Forum (HRVF) that it is vital that when the ferry service is not operating there is detailed alternative route information available, as proposed in their presentation attached. (See 5 below)

Natural England's comments

Our response to this representation is set out in detail within our comments relating to the Ramblers' Association's representation at MCA/CCG2/R/6/CCG0019. The Hamble to Warsash Ferry (The Pink Ferry)

Relevant appended documents (see section 5):

5.4 Hamble River Valley Forum suggested route

Representation number:

MCA/CCG2/R/6/CCG0019

Organisation/ person making representation:

[Redacted] on behalf of The Ramblers

Route section(s) specific to this representation:

The Hamble to Warsash Ferry (The Pink Ferry)

Maps 2e, 3a

Other reports within stretch to which this representation also relates:

CCG 3

Representation in full

We note the discussion of options for the River Hamble estuary presented on page 21 of the Overview report.

In line with other local opinion, Ramblers do not believe that the reliability of the Pink Ferry is such that the 'continuity of access' to the continuous coastal route will be sufficiently guaranteed. This is a core objective of the ECP.

Local walking groups wishing to use the ferry have found the service wanting on occasions, particularly in the winter and/or in bad weather conditions when the service can be terminated abruptly on safety grounds. On the majority of these occasions walking conditions are acceptable and walkers expect to be able to progress along the coast path.

We consider that the Hamble Ferry provides a useful alternative when it is available, but by using it the route misses a great deal of potential for enhancing coastal access.

The Ramblers strongly support the use of the A27 road bridge at Bursledon for the crossing of the Hamble. We believe that the east side of the estuary provides a waterside walking experience that is possibly unique in southern England, and its inclusion in the England Coast Path would provide a highlight in the length between Calshot and Gosport. There is already a route on public highways and public paths from the east side of the Bursledon bridge to the ferry slip at Warsash. This route has virtually uninterrupted views of the river throughout its length. The southern 1.8km is on a path which is extremely unusual in that it has tidal waters on both sides. The cover photograph of the Hamble River Valley Forum (HRVF) report illustrates this well.

This path has been progressively improved over recent years and is now very popular with the public. It is appreciated that the route passes through very sensitive areas for wildlife, but it is mostly divorced from the surrounding waters, mudflats and saltmarsh and it is unlikely that designation as the Coast Path would significantly change the impact on wildlife, due to the currently popularity of the path. If it is so designated, then the powers to create excluded areas might actually offer more protection than is ever likely to be the case if it is not designated.

It is acknowledged that the route on the west side of the estuary proposed by the HRVF is not coastal, but it is mostly on attractive quiet paths and roads. Ramblers feel that the lack of a coastal view is more than compensated by the high quality of the east side route. The west side route has potential for some improvement once development of the old Hamble Airfield is commenced.

Ramblers agree with the view expressed by the Hamble River Valley Forum that if the ferry continues to be the crossing point for the ECP then it is vital that when the ferry service is not operating there is detailed alternative route information available, as proposed in their presentation attached.

Natural England's comments

A representation by the Open Spaces Society was received with this common theme in CCG 3 - **MCA/CCG3/R/2/CCG0016**. A representation also received by the Hampshire Countryside Access Forum below at **MCA/CCG2/R/8/CCG1650**

Natural England's approach to rivers and estuaries is generally to use the first reliable crossing point, be it a bridge or ferry. Our approach is covered in detail under Chapter 10 of the Coastal Access Approved Scheme ("the Scheme"). It is at our discretion whether we propose to carry on up a river to the first crossing point or use a ferry and we always give careful consideration over which option we propose. In this circumstance we took in to account whether the cost of extending the trail to the first public bridge would be proportionate to the extra public enjoyment of the coast that would result. As per section 10.1.16 of the Scheme we decided that this would not be the case due to the extent of diversion that would be necessary: to achieve a fair balance between private and public interests, to avoid large areas of excepted land and environmentally sensitive sites and the fact there is a ferry downstream of the bridge. The following covers this in more detail.

As per section 10.3 of the Scheme, the existence of a ferry service is an important factor in our decision over how to cross an estuary. We proposed using the Hamble Ferry as conversations with the ferry operator and owner, [redacted], evidenced that the ferry runs year-round (except Christmas Day) and has only had a very small number of non-service hours in past years, due to either mechanical breakdown or storms with sustained winds of force 6 and above. The Ferry Operating hours are: Summer 09.00 - 18.00 and Winter 09.00

- 16.00 daily. The operator is very happy to promote the ferry service as part of the England Coast Path and refutes the claims the ferry service is not reliable.

Should the ferry cease to run or reduce its service then we would look at the alternatives to provide a continuous route and submit a variation report.

Aside from the fact there is a regular ferry, any route up and down the river would involve significant inland diversions away from the coast to avoid excepted land (buildings, gardens and their curtilage, a railway line, boat yards and marinas). During early dialogue with landowners and those with a legal interest, concerns were raised over the potential impacts of a route up the river such as the creation of coastal margin and any subsequent spreading room. Our decision to use the ferry was supported by those landowners.

The River Hamble is covered by the Solent and Southampton Water Ramsar, Solent and Southampton Water Special Protection Area, Solent Maritime Special Area of Conservation and the Lee-on-the-Solent to Itchen Estuary SSSI. Any route up river would need to take in to account the notified features of these sites. Our initial assessments and consultation suggested that due to the sensitivity of the bird features and the saltmarsh, mudflats and creeks on the western side of the river, it would be necessary to divert away from the coast in several locations and/or use other mitigation measures to prevent any likely significant effects on the features.

The Solent Recreation Mitigation Partnership, The Wildlife Trust and Natural England site officers had concerns about increased disturbance to over wintering and breeding birds through routing the ECP up the river. On the eastern side of the river for example, where there is already a riverside PRoW. That path and its use is evidenced as creating serious disturbance issues and due to concerns over an increase in use by becoming part of the ECP and the possible impact of coastal margin/spreading room we decided not to propose it as part of the ECP.

Based on our investigations during Stage 2, any route up river would likely predominantly use existing access with no new routes closer to the coast. The Strawberry trail on the west side of the estuary proposed by the HRVF is acknowledged as not coastal and is on existing paths and roads. The only new access rights created would likely be over agricultural land. We also estimated 250-300 new legal interests affected, as well as a need for public safety, land management and nature conservation directions to restrict access thus limiting any spreading room and significant infrastructure works on the eastern side.

We also took in to account the cost of aligning, reporting and then opening and maintaining a new national trail and how that would place an increased responsibility on Hampshire County Council as the access authority.

Relevant appended documents (see section 5):

5.4 England Coast Path, Calshot to Gosport, representation by Hamble River Valley Forum, August 2019

Representation number:
MCA/CCG2/R/5/CCG0019

Organisation/ person making representation:

[Redacted] on behalf of The Ramblers

Route section(s) specific to this representation:

Section CCG-2-S049

CCG 2. Map 2e

Other reports within stretch to which this representation also relates:**Representation in full**

We consider that the proposed realignment of section CCG-2-S049 away from the adjacent public right of way (No. 505 Hamble-le-Rice) is not required. The Eastleigh Ramblers working for Hampshire County Council (as the highway authority) and with Eastleigh Borough Council (as landowner) and with the help of the Hamble Conservation Volunteers are planning to resurface the sections of the path that are defective during the winter of 2019/2020. Creating a second route would be duplication of effort and cause unnecessary loss of trees and bushes.

Natural England's comments

We considered the alignment options at this location at length in consultation with the Access Authority, Hampshire County Council.

Whilst we note the comments made by the Ramblers and others, on our site visits the public right of way (PRoW) at No. 505 Hamble-Rice was very muddy and boggy for significant parts of its length. Additionally the drainage ditch running along the seaward side of this path is prone to flooding both from water draining from the higher ground and from tidal inundation due to a faulty tidal flap. Due to these circumstances a clear desire line along CCG-2 S049 has been created by walkers seeking to avoid the PRoW. At the time of publication of our proposals, despite the ambition of local user groups to improve the state of the PRoW, its long term condition cannot be guaranteed. Ownership of the tidal flap cannot be determined and as such no repairs can be made to it and so flooding of the PRoW will continue. Dialogue with the Council has indicated concern over undertaking any improvement works required without any assurance those works would be secure.

Hamble Common is Section 15 Open Access land; access across the common by walkers and those with dogs is extremely popular and we are proposing the use of a well walked route.

Aligning along the PRoW in our view, offers no added recreational value to the walker as sea views are obstructed by trees and the nearby marina boundary. Please also see NE response at Point 1 Hamble Conservation Volunteers (HCV)

The proposed alignment is along an existing walked route and is clear of obstructions, as such we will not be causing any loss of trees or bushes. It is also on higher ground less prone to becoming waterlogged and provides better views albeit landward over the Section 15 common land.

The PRoW however would remain available for those walkers who choose to use it.

Relevant appended documents (see section 5): n/a

Other representations

Representations containing similar or identical points

Representation ID

Organisation/ person making representation:

MCA/CCG2/R/4/CCG1618

Hamble River Valley Forum (HRVF)

MCA/CCG2/R/1/CCG1649

Curdridge Parish Council

Name of site:

CCG2 Itchen Bridge to Hamble Ferry (Pink Ferry) Maps

Report map reference:

CCG2B

Route sections on or adjacent to the land:

Other reports within stretch to which this representation also relates

CCG 3

Summary of point:

These two representations are made in regard to the use of the Hamble to Warsash Ferry (Pink Ferry) across the River Hamble. They contain similar points to those made in the full representations MCA/CCG2/R/6/CCG0019 (Ramblers' Association and MCA/CCG2/R/8/CCG1650 (Hampshire Countryside Access Forum).

These representations argue that the ferry crossing is at times unreliable and that it has limited operational hours, which could leave ECP users unable to cross to the east bank of the River Hamble. This is evidenced by local users.

The Gosport ferry is one of the best ferries on this area of the coast, with long operating hours, but the England Coast Path does not use it as the first crossing point and provides a route around Portsmouth Harbour. HRVF welcomed and supported NE provision of a path around Portsmouth Harbour for walkers to enjoy and said that the Hamble River estuary should have the same to ensure there is no gap in the England Coast Path at any time.

The Hamble River estuary is important nationally and is a significant part of the coast. Providing an 'alternative route' would provide an opportunity to improve coastal access and recreational benefits. This is particularly important to walkers, tourists and future visitors of the area.

An 'alternative route' would enable visitors and tourists to use Bursledon Station as a rail link to the Calshot to Gosport section of the path. The only other rail link is in urban Southampton.

An 'Alternative Route' would also reduce the need for a variation report in the future. So as not to give NE any extra work, HRVF has suggested an 'alternative route' using the existing

riverside walk on the east side of the river and the 'Strawberry Trail' that runs parallel to the river from Hamble to Bursledon.

HRVF hopes in the future opportunities can be taken to make the path on the west side closer to the river and extend above the A27 road bridge to Botley.

Natural England's comment:

Our response to these representations is set out in detail within our comments relating to the Ramblers' Association's representation at MCA/CCG2/R/6/CCG0019. The Hamble to Warsash Ferry (The Pink Ferry).

We have addressed the reasons for our alignment around Portsmouth Harbour in our proposals for the Gosport to Portsmouth reports, published 20th June 2019.

Relevant appended documents (see Section 5):

5.4 England Coast Path, Calshot to Gosport, representation by Hamble River Valley Forum, August 2019

Representation ID:

MCA/CCG Stretch/R/5/CCG1619

Organisation/ person making representation:

Solent Protection Society

Name of site:

Whole report

Report map reference:

Maps CCG 2a to CCG 2e

Route sections on or adjacent to the land:

Other reports within stretch to which this representation also relates

CCG 1 and CCG 3

Summary of representation:

The Solent Protection Society (SPS) supports the proposals and is pleased with the links that have been proposed to join up various sections of path and create a more continuous route. It hopes that NE will monitor options to align closer to the coast at Fawley Oil Refinery should circumstances change. It also notes that the small detours required on the eastern shore of Southampton Water at Netley and the Holiday Park are a pity.

The above comment relates to Report CCG 1 in relation to the Fawley Oil Refinery, Report CCG 2 in relations to Southampton Water at Netley and Report CCG 3 at Solent Breezes Holiday Park.

SPS accepts that the best of the three options has been chosen at the three estuary crossings.

SPS supports the proposed S25A designations proposed throughout the route to exclude the public from the seaward coastal margin. Although these directions are given because the saltmarsh/flat is unsuitable for public access, it notes the knock-on effect these directions will have in protecting important wildlife sites. SPS hopes that adequate signage is proposed along the route to inform the public of the exclusions and that in critical areas fencing is proposed to physically restrict public and particularly dog access.

Natural England's comment:

Natural England acknowledge these comments in response to our stretch proposals, and are grateful for the statements of support. We have proposed to install an interpretation panel to inform users of the local environmental sensitivities along this stretch. In report CCG 2 a panel will be installed at section CCG-2-SS043 near to junction with CCG-2-S044 at Hamble Common.

Relevant appended documents (see Section 5): n/a

Representation ID:

MCA/CCG2/R/3/CCG1640

Organisation/ person making representation:

[Redacted] on behalf of the Hamble Conservation Volunteers (HCV)

Name of site:

Hamble Common

Report map reference:

Map CCG 2e

Route sections on or adjacent to the land:

CCG-2-SO48 FP to CCG-2-SO50FP

Other reports within stretch to which this representation also relates

n/a

Summary of representation:

Point 1 – Status of Hamble Common

HCV suggests that the report does not indicate that Hamble Common is a SSSI (Site of Special Scientific Interest) only Scheduled Monument status.

Point 2 – Alignment suggestion

They suggest that the current public right of way between CCG-2-SO48 FP to CCG-2-SO50FP is undergoing repairs to make the path accessible all year round and suggest that the proposed alignment is much more invasive in terms of encroaching upon the SSSI. They represent that the alignment should not deviate from this existing right of way and that a temporary fix has been put in place to restrict tidal flood water until a more permanent solution can be implemented. Since these temporary remedial works have been undertaken, no significant flooding of the footpath as a result of tidal surge.

Point 3 – Impact upon nesting Nightjars

The alternative route would also impact on nesting territories of the Common's nesting Nightjars (*Caprimulgus europaeus*).

Natural England's comment:

Point 1 – Status of Hamble Common

Hamble Common is not a SSSI in its own right, instead this area of land forms part of the Lee-On-Solent to Itchen Estuary SSSI which is referenced in the report. Unit 10: Hamble Common, and Unit 11: Hamble Common North form part of the SSSI. Overview Map A Designated Sites in the Nature Conservation Assessment shows the extent of this SSSI. Also shown on Map c: key Statutory Environmental Designations on the Calshot to Gosport stretch Overview

Point 2 – Alignment suggestion

Natural England's response to this point is covered in more detail at representation - MCA/CCG2/R/5/CCG0019.

Our proposed route in the open access land is well walked and used already, it does encroach a short distance into the SSSI, however our Nature Conservation Assessment concluded no impact on any of the sites listed features.

Point 3 – Impact upon nesting Nightjars

Our proposals have been made following a series of workshops and discussions with Bird Aware Solent (the brand name for the Solent Recreation Mitigation Partnership), during which we have checked that detailed design of the access proposals is compatible with the Solent Recreation Mitigation Strategy and latest thinking on how it will be delivered, including site-specific visitor management measures.

Nightjars (*Caprimulgus europaeus*), whilst a designated feature of the New Forest SSSI, are not designated within the Lee-on-Solent to Itchen Estuary SSSI. No concerns about the impact of our route on the nesting Nightjars were raised during discussions with Natural England site officers. During correspondence with Andrew Balmer of the Hamble Conservation Volunteers, an annotated map was provided (see supporting document at 6.3). It shows that our proposed route avoids the area shaded pink that represents the breeding nightjar territories.

We would reiterate that the Common is established Section 15 open access land that is regularly used by locals and offers attractions to visitors such as the car park to the south and the excellent views over The Solent. The establishment of the England Coast Path, along a well-used existing walked path, will create a well way-marked route and we anticipate that most walkers will remain on the path and will therefore pass through the Common with minimal disturbance.

Relevant appended documents (see Section 5):

5.5 Annotated Map of Hamble Common showing breeding Nightjar territories (provided by [redacted] of Hamble Conservation Volunteers).

Representation ID:
MCA/CCG2/R/7/CCG0008

Organisation/ person making representation:
The Disabled Ramblers

Name of site:
Report CCG2: Itchen Bridge to Hamble Warsash Ferry (Pink Ferry)

Report map reference:
Map CCG 2e

Route sections on or adjacent to the land:

Other reports within stretch to which this representation also relates
CCG 1 and CCG 3

Summary of representation:

The Disabled Ramblers are concerned that Natural England, in the Accessibility statement 2.2.11 and 2.2.13 in Report CCG2: Itchen Bridge to Hamble Warsash Ferry (Pink Ferry) has not recognised that there is a significant and steadily increasing number of people with reduced mobility who use off-road mobility scooters and other mobility vehicles to enjoy routes on more rugged terrain.

They request that NE takes all reasonable steps to make the trail as easy as possible for disabled people and those with reduced mobility and be mindful of British Standard BS5709:2018 Gaps Gates and Stiles and reconsider suitability of existing infrastructure indicated as being retained because in many cases this bars legitimate access for this group of people.

Natural England's comment:

Section 4.3 of the Scheme – ‘Adjustments for disabled people and others with reduced mobility’ guides our approach to aligning the trail to ensure that it is as inclusive as possible.

”4.3.8 We follow the principles set out in our publication “By All Reasonable Means” to make the trail as easy to use as we reasonably can for disabled people and others with reduced mobility, whilst accepting that such opportunities will often be constrained by practical limitations, such as the rugged nature of the terrain or the availability of visitor transport and facilities (see section below). Where there is a choice of routes (after taking into account all the key principles in chapters 4 and 5 of the Scheme), we favour the one that is accessible to the widest range of people or most easily adapted for that purpose.

4.3.9 Throughout the trail, we avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances. For example, where we install infrastructure in preparation for the introduction of the rights (or replace existing infrastructure, once it has reached the end of its useful life) we normally use:

- *gaps to cross field boundaries where livestock control is not an issue;*
- *gates rather than stiles where livestock will be present, designed to enable access by people with wheelchairs; and*
- *graded slopes rather than steps if practicable.*

4.3.10 Where appropriate, our proposals include further targeted adjustments to make the trail more accessible for people with reduced mobility. This may include improvements to the

information available about those lengths of trail that are already accessible to a wide range of people. We also ask local representatives to help us identify, prioritise and design suitable and affordable physical improvements to the trail according to their local needs and the available budget. They might typically identify:

- particular sections of trail that are well-served by public transport and visitor facilities, but have physical barriers to access for people with reduced mobility which could realistically be removed; or
- sections with potential to provide key strategic links through adjustments that are readily achievable.

4.3.11 In all this, we will have regard to any concerns about making it easier in practice for people to enter land unlawfully with vehicles; the importance of conserving cultural heritage features and landscape

character in the design of the trail and infrastructure; land management needs, for example the need for crossing points to be designed to prevent livestock from escaping; the costs involved; and the need for crossing points between fields to facilitate access for horse riding or cycling where there are existing rights or permissions for these activities.”

Our proposals for CCG 2 include locations where the new or retained infrastructure may restrict access to those with reduced mobility. In drawing up our proposals we have taken all reasonable steps to make the trail as easy as possible for disabled people and those with reduced mobility and been mindful of British Standard BS5709:2018 Gaps Gates and Stiles. For example

- Steps replaced at section CCG-2-S031. This location which passes from a track onto a shingle beach where steps are required to pass a slipway. Site constraints meant that a graded slope was not possible.
- Kissing gates at sections CCG-2-S049, CCG-2-S050 and CCG-2-S056 be replaced with gates that conform with British Standard BS5709:2018 Gaps Gates and Stiles
- Foot bridges at sections CCG-2-S051, CCG-2-S052 and CCG-2-S053 are to be replaced however physical site constraints limit the width of these bridges.

Relevant appended documents (see Section 5):

5.1 Photos provided by The Disabled Ramblers

Representation ID:

MCA/CCG2/R/2/CCG0095

Organisation/ person making representation:

Hamble le Rice Parish Council

Name of site:

Hamble Warsash (Pink) Ferry

Report map reference:

Map CCG 2e and CCG 3a

Directions Map CCG 2B

Route sections on or adjacent to the land:

Other reports within stretch to which this representation also relates

CCG 3

Summary of representation:

Point 1 – Use of the Hamble Warsash (Pink) Ferry

Their aspiration is to create a path that runs close to the river and extends up to Botley. This they say recognises the important character of the villages along the river. Also, they have practical objections about reliance on a ferry-based service that operates a limited timetable and is not an all year-round service and heavily reliant on weather and tidal conditions.

The Parish Council argue that if the ferry alignment is retained then it is important that an alternative route is provided for the Hamble River section via the A27 road bridge. Those wishing to use the ECP, particularly visitors early/late in the day, would otherwise be stranded with no ferry in operation and therefore an alternative route is essential to overcome this problem. This could use the existing rights of way network along the river – the Strawberry Trail on the west and the existing riverside walk on the east side.

Point 2 – Direction Map CCG2B

The Parish Council has concerns that Direction Map CCG2B includes Parish Council land off of the Foreshore from the Dinghy Park slipway to the northern quay in the S25A direction to exclude access. The Parish Council consider this to be a public beach for recreational use. They say that it should therefore not be excluded.

Natural England’s comment:

Point 1 – Use of the Hamble Warsash (Pink) Ferry

Our response to this point in this representation are outlined in detail within our comments to representation MCA/CCG2/R/6/CCG0019. The Hamble to Warsash Ferry (The Pink Ferry)

Point 2 – Direction Map CCG2B

The public can continue to enjoy the use of the beach as they currently do because the beach does not form part of the proposed S25A direction.

We have conveyed this to the Parish Council.

Relevant appended documents (see Section 5): n/a

5.4 England Coast Path, Calshot to Gosport, representation by Hamble River Valley Forum, August 2019

5. Supporting documents

5.1 The Disabled Ramblers photos - MCA/CCG1/R/5/CCG0008

Please list below any documents or evidence you have included in support of the representation(s):

Examples of people using mobility vehicles on various terrain:



Disabled Ramblers: Tidworth Ramble May 2019



Disabled Ramblers: Tidworth Ramble May 2019



Disabled Ramblers: Tidworth Ramble May 2019



Disabled Ramblers: Godrevy Ramble June 2019



Disabled Ramblers: Godrevy Ramble June 2019



Disabled Ramblers: Bradgate Park April 2019

5.2 Extract from 'Natural England's Nature Conservation Assessment for Coastal Access Proposals between Calshot and Gosport' - MCA/CCG1/R/2/CCG00975.2

New Forest SSSI Units 181, 182 and 183

Is this site also part of a European site? No

The New Forest SSSI covers a large area (28,925ha) mostly westwards of this stretch which has been assessed as part of the adjacent England Coast Path stretch from Highcliffe to Calshot.

Within this report we have considered the reportable features of units in the vicinity of this stretch, namely parts of units 181,182 and 183 (Holbury Mire).

These lie seawards of the path alignment and within coastal margin near Hardley as show in Figure 2.

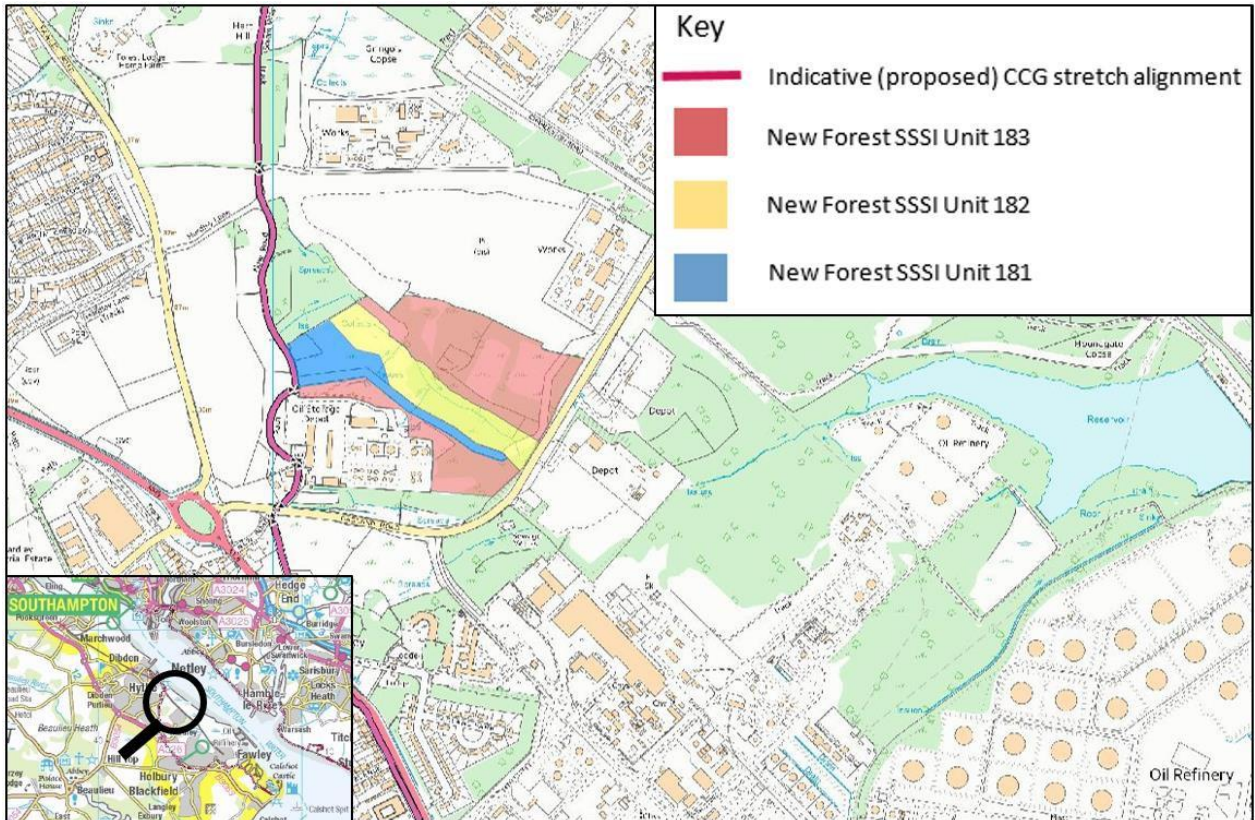


Figure 2. Units of the New Forest SSSI within coastal margin.

Some features of the SSSI are not reportable for units 181 to 183 and therefore have not been considered within this assessment. For a full list of notified features please see Annex 2.

The following notified features are present as reportable features within units 181 to 183, of which none are assessed in the HRA. These features will be assessed further within this document:

Features to be Assessed	
Unit and Reportable Feature	Notified SSSI Feature
Unit 181 - Lowland dry heath	Assemblages of breeding birds - Lowland heath (Dartford Warbler, Nightjar and Woodlark)
Unit 181 - Lowland dry heath	H2 - <i>Calluna vulgaris</i> - <i>Ulex minor</i> heath
Unit 181 - Lowland dry heath	H3 - <i>Ulex minor</i> - <i>Agrostis curtisii</i> heath
Unit 181 - Lowland neutral grassland MG5	MG5 - <i>Cynosurus cristatus</i> - <i>Centaurea nigra</i> grassland
Unit 182 – Bryophyte assemblage	Combinations of species - Bryophytes
Unit 182 - Lowland wetland including basin fen, ballen fen, floodplain fen, water fringe fen, spring/flush fen and raised bog lagg	M1 - <i>Sphagnum auriculatum</i> bog pool community
Unit 182 - Lowland wetland including basin fen, ballen fen, floodplain fen, water fringe fen, spring/flush fen and raised bog lagg	M10 - <i>Carex dioica</i> - <i>Pinguicula vulgaris</i> mire
Unit 182 - Lowland wetland including basin fen, ballen fen, floodplain fen, water fringe fen, spring/flush fen and raised bog lagg	M14 - <i>Schoenus nigricans</i> - <i>Narthecium ossifragum</i> mire
Unit 182 - Lowland wetland including basin fen, ballen fen, floodplain fen, water fringe fen, spring/flush fen and raised bog lagg	M21 - <i>Narthecium ossifragum</i> - <i>Sphagnum papillosum</i> mire
Unit 182 - Lowland wetland including basin fen, ballen fen, floodplain fen, water fringe fen, spring/flush fen and raised bog lagg	M6 - <i>Carex echinata</i> - <i>Sphagnum recurvum</i> (<i>fallax</i>) / <i>auriculatum</i> (<i>denticulatum</i>) mire
Unit 182 - Lowland wetland including basin fen, ballen fen, floodplain fen, water fringe fen, spring/flush fen and raised bog lagg	M9 - <i>Carex rostrata</i> - <i>Calliergon cuspidatum/giganteum</i> (<i>Calliergonella cuspidata/Calliergon giganteum</i>) mire
Unit 183 - Lowland mixed deciduous woodland	W10 - <i>Quercus robur</i> - <i>Pteridium aquilinum</i> - <i>Rubus fruticosus</i> woodland
Unit 183 - Lowland mixed deciduous woodland	W14 - <i>Fagus sylvatica</i> - <i>Rubus fruticosus</i> woodland

Features to be Assessed	
Unit and Reportable Feature	Notified SSSI Feature
Unit 183 - Lowland mixed deciduous woodland	W15 - <i>Fagus sylvatica</i> - <i>Deschampsia flexuosa</i> woodland

Unit 183 - Lowland mixed deciduous woodland	W16 - <i>Quercus</i> spp.- <i>Betula</i> spp.- <i>Deschampsia flexuosa</i> woodland
Unit 183 - Lowland mixed deciduous woodland	W4 - <i>Betula pubescens</i> - <i>Molinia caerulea</i> woodland
Unit 183 - Lowland mixed deciduous woodland	W8 - <i>Fraxinus excelsior</i> - <i>Acer campestre</i> - <i>Mercurialis perennis</i> woodland
Unit 182 - Invertebrate assemblage W313 moss and tussock fen	Invertebrate assemblage
Unit 183 - Invertebrate assemblage A1 arboreal canopy	Invertebrate assemblage

Table 7: Reportable and notified features for the New Forest SSSI units 181 to 183

For clarity the features which will be assessed within this document can be grouped into the following:

- Lowland dry heath
- Bryophytes
- Lowland neutral grassland
- Lowland Wetland (includes W313 invertebrate assemblage)
- Lowland mixed deciduous woodland (includes A1 invertebrate assemblage)

Current situation

The proposed Coast Path aligns along New Road immediately adjacent this SSSI land. However a site visit in November 2018 confirmed the presence of a barbed wire fence and several signs prohibiting access onto this land. The wide gravel path takes a direct route and does not present any obstacles to walkers.

Unit 181 was assessed by Natural England in 2019 as ‘unfavourable, no change’ with the description: “Grassland present is a poor, but closest fit, to MG5.... As a result of the lack of grazing there is too much litter and very little bare ground. The feature, MG5, is unfavourable no change due to lack of grazing and tree/scrub/bracken encroachment.... No lowland heath was observed at the time of the survey and for many years it appears that there has been no evidence for the presence of this feature within this unit. At the time of writing it has not been possible to locate any unit specific historic evidence to support or negate the presence of Lowland Heathland. If historic record are found, suggesting lowland heath was present at the time of notification this feature would be unfavourable declining.”¹

Unit 182 was assessed by Natural England in 2019 as ‘unfavourable, declining’ with the description: “Since the previous survey there has been a clear loss of extent of lowland wetland to dense young willow scrub. It is likely that this entire unit would have been open fen and mire at the time of notification.... Although the unit was assessed as unfavourable recovering in 2013 due to the creation and implementation of a management plan, and despite limited scrub clearance a number of years ago, this feature has continued to decline, and is now unfavourable declining.

There are signs of nutrient enrichment flowing down from the industrial complex to the south-west and into the mire. This urgently needs investigation and remediation.”²

Unit 183 is a woodland unit in ‘favourable’ condition, as assessed in 2019 with the description: “Overall there is a good age structure and plenty of fallen and standing deadwood. The reintroduction of grazing to the site would not adversely affect woodland condition.”³

Feature (or group of features)	Consideration	Conclusion
Lowland dry heath	The 2019 site assessment by Natural England concluded that no lowland heath was present on this site and no historic evidence for lowland heathland found at the time of the assessment.	These features are not assessed as being present on the site. In addition, visitors to the site are separated from the features by an existing fence and therefore these features will not be impacted.
Bryophytes	Ground level bryophytes are sensitive to trampling from walkers and dogs.	Visitors to the site are separated from the features by an existing fence and therefore these features will not be impacted.

Risk analysis

¹ Holbury Mire Unit 181 assessment webpage. Accessed 19th June 2019
<https://designatedsites.naturalengland.org.uk/UnitDetail.aspx?UnitId=1019741&SiteCode=s1003036&SiteName=&countyCode=&responsiblePerson=>

² Holbury Mire Unit 182 assessment webpage. Accessed 19th June 2019
<https://designatedsites.naturalengland.org.uk/UnitDetail.aspx?UnitId=1024166&SiteCode=s1003036&SiteName=&countyCode=&responsiblePerson=>

³ Holbury Mire Unit 183 assessment webpage. Accessed 19th June 2019
<https://designatedsites.naturalengland.org.uk/UnitDetail.aspx?UnitId=1024070&SiteCode=s1003036&SiteName=&countyCode=&responsiblePerson=>

Feature (or group of features)	Consideration	Conclusion
Lowland neutral grassland	Potentially sensitive to trampling by walkers and dogs.	Visitors to the site are separated from the features by an existing fence and therefore these features will not be impacted.
Lowland wetland	Potentially sensitive to trampling by walkers and dogs.	The nature of a wetland would discourage walkers. Visitors to the site are separated from the features by an existing fence and therefore these features will not be impacted.
Lowland mixed deciduous woodland (includes A1 invertebrate assemblage)	Ground flora and fauna potentially sensitive to trampling by walkers and dogs.	Visitors to the site are separated from the features by an existing fence and therefore these features will not be impacted.

Table 8: Risk analysis table for the New Forest SSSI units 181 to 183

Establishment works

Is SSSI assent needed to implement any specific proposals for establishment works?

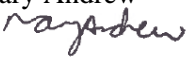

No. This unit falls within coastal margin with no proposed works.

Conclusion

We, Natural England, are satisfied that our proposals to improve access to the English coast between Calshot and Gosport are fully compatible with our duty to further the conservation and enhancement of the notified features of the Hythe to Calshot Marshes SSSI, North Solent SSSI Units 15 & 35, New Forest SSSI Units 181, 182 and 183 and the Lee-on-the Solent to Itchen Estuary SSSI, consistent with the proper exercise of our functions⁵.

In respect of the Calshot Marshes Local Nature Reserve, Hythe Spartina Marshes Nature Reserve and the Hook-with Warsash Local Nature Reserve we are satisfied that in developing the new access proposals the appropriate balance has been struck between Natural England's conservation and access objectives, duties and purposes.

See also, where relevant, the conclusions of the separate HRA relating to common features. The conclusions of this assessment have been checked by:

Mary Andrew 	3 rd July 2019	On behalf of the Coastal Access Programme Team
Graham Horton 	1 st July 2019	Senior Officer with responsibility for protected sites

Map A. Designated sites

(Overleaf)

⁵ Natural England's functions includes its balanced general purposes for access, nature conservation and landscape

under the NERC Act 2006, any specific statutory duties it may have to deliver specific improvements to public access, and the access-related policies and priorities it periodically agrees with Defra.



5.3

Access point from proposed alignment over concrete block



View through shrub and bushes just beyond access point



Desire line towards blackberry bushes



Existing path showing hedges and hidden fencing seaward of the path



5.4 Hamble River Valley Forum suggested 'Alternative Route'



Riverside walk up the Hamble River estuary from Warsash towards Swanwick & Bursledon

ENGLAND COAST PATH

Calshot to Gosport

**REPRESENTATION BY
HAMBLE RIVER VALLEY FORUM**

August 2019

- The Hamble River Valley Forum (HRVF) is a partnership of local Parish and Town Councils in the Hamble River Valley. It enables the councils to work together with user groups such as river users, ramblers and the public to improve and protect the river and its valley.
- In 2016 in response to representatives of Natural England (NE) seeking local group's views on the route of the England Coast Path the HRVF made a presentation regarding reasons for the route to include the Hamble River estuary.

HRVF stated that for the England Coast Path to be a permanent asset for the future it must use the A27 Road Bridge and not the Hamble-Warsash Ferry as the first crossing point of the Hamble River.

The main reasons were:

The Hamble River estuary is an important part of the coast and is one of the country's leading boating and recreational centres, therefore it should be included in the England Coast Path. It would provide enormous recreational benefits by providing improved coastal access for the public to enjoy sites and scenes on the route, including the cultural and heritage benefits of the villages on the Hamble peninsula. It would be an added attraction for visitors and tourists that would be beneficial to them and local businesses.

The Hamble-Warsash Ferry operates limited hours, most of the year 9am- 4pm, therefore much of the day (especially for people who are working) the England Coast Path would not be able to be used. Due to weather conditions, extremely high tides and essential holidays such as Christmas it cannot guarantee to be operating.

The Gosport ferry is one of the best ferries on this area of the coast, with long operating hours, but the England Coast Path does not use it as the first crossing point and provides a route around Portsmouth Harbour. HRVF welcomed and supported NE provision of a path around Portsmouth Harbour for walkers to enjoy and said that the Hamble River estuary should have the same to ensure there is no gap in the England Coast Path at any time.

- The current request for comments on the proposals for the England Coast Path Calshot to Gosport, HRVF submits the following representation. HRVF has not changed its view that Option 1 on page 21 of 'Calshot to Gosport Overview' is its preferred option but acknowledges the decision for Option 2 in the report.

If Option 2 is taken forward it is essential that an 'Alternative Route' is provided via the A27 Road Bridge following existing riverside footpaths/ROWs and the 'Strawberry Trail' for when the Hamble- Warsash Ferry is not available. A similar alternative route has been provided at Netley for when on a few occasions each year there is an extremely high tide.

The Hamble-Warsash Ferry operates limited hours (9am-4pm Monday to Friday and 8am to 5pm summer weekends) and the service is subject weather permitting it is safe to run. Most times of the year the England Coast Path outside of the hours 9am-4pm would not be accessible to walkers and the public.

An 'Alternative Route' is required to ensure the England Coast Path can be used at all times and to avoid long waits when the ferry is not operating. No matter what information is provided about the ferry's operational hours some people using the England Coast Path will be caught out and stranded to their great disappointment.

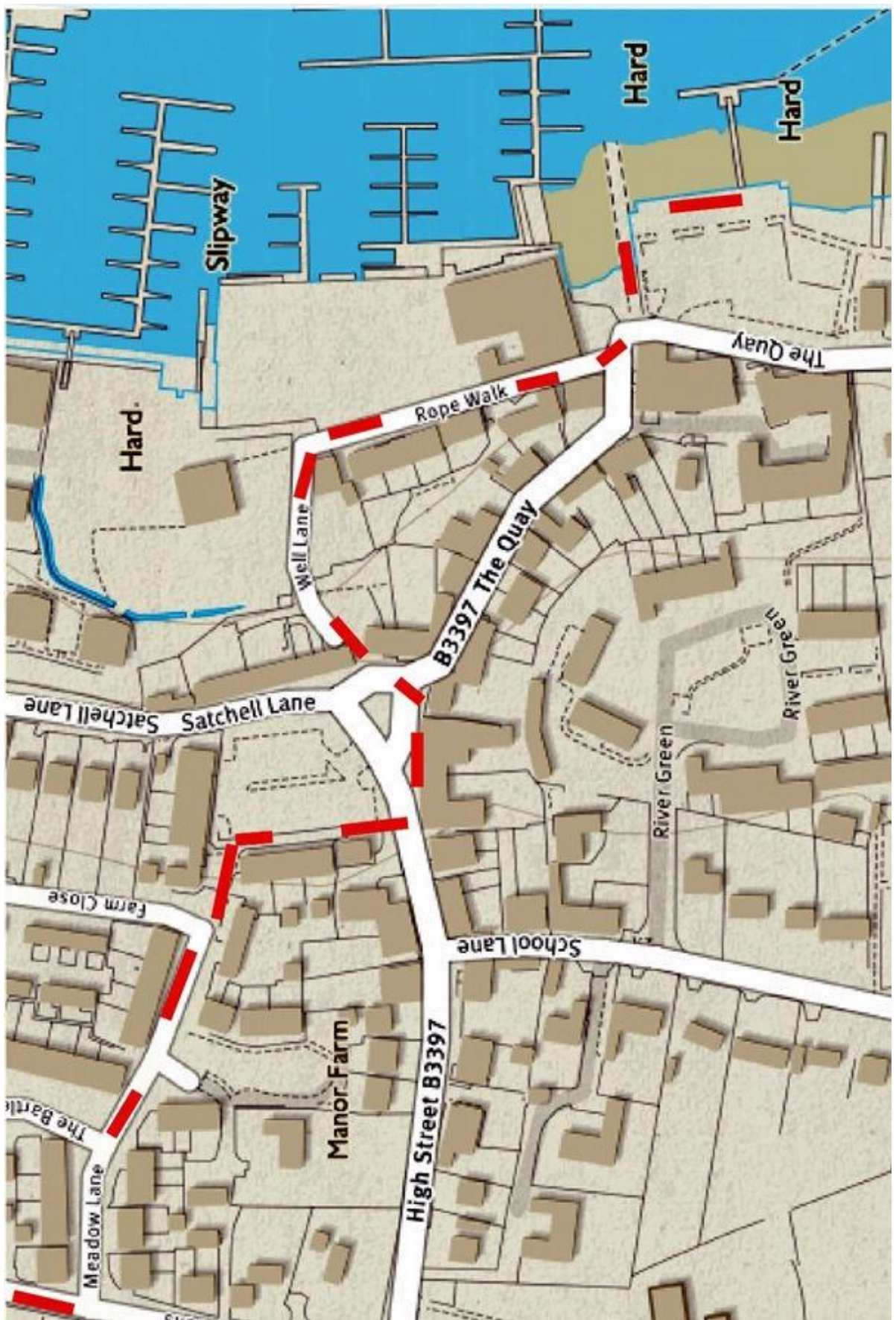
The Hamble River estuary is important nationally and is a significant part of the coast and providing an 'Alternative Route' would provide an opportunity to improve coastal access and recreational benefits. This is particularly important to walkers, tourists and future visitors of the area.

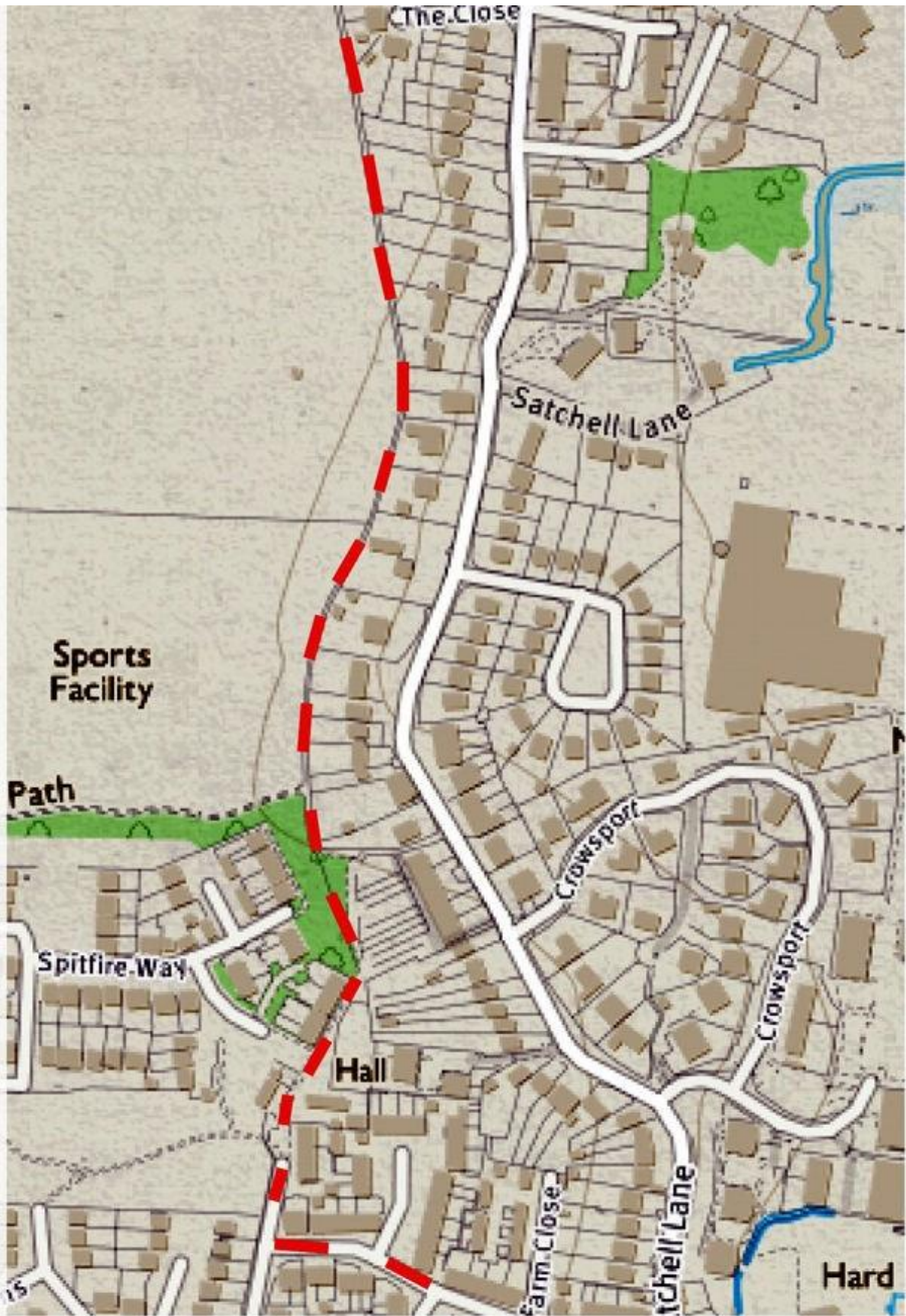
An 'Alternative Route' would enable visitors and tourists to use Bursledon station as a rail link to the Calshot to Gosport section of the path. The only other rail link is in urban Southampton.

An 'Alternative Route' would also reduce the need for a variance report in the future.

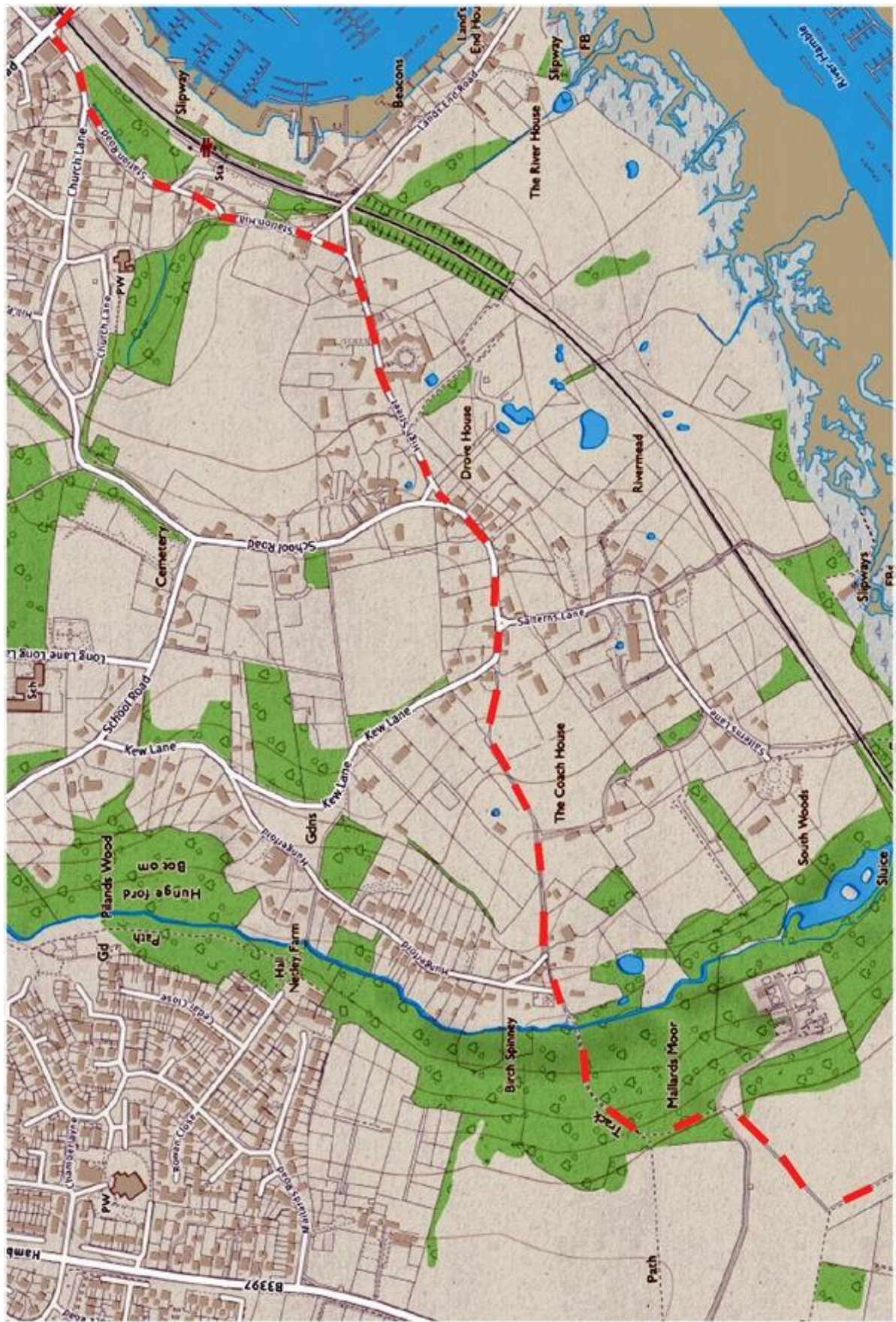
So as not to give NE any extra work, HRVF submits an 'Alternative Route' using the existing riverside walk on the east side of the river and the 'Strawberry Trail' that runs parallel to the river from Hamble to Bursledon.

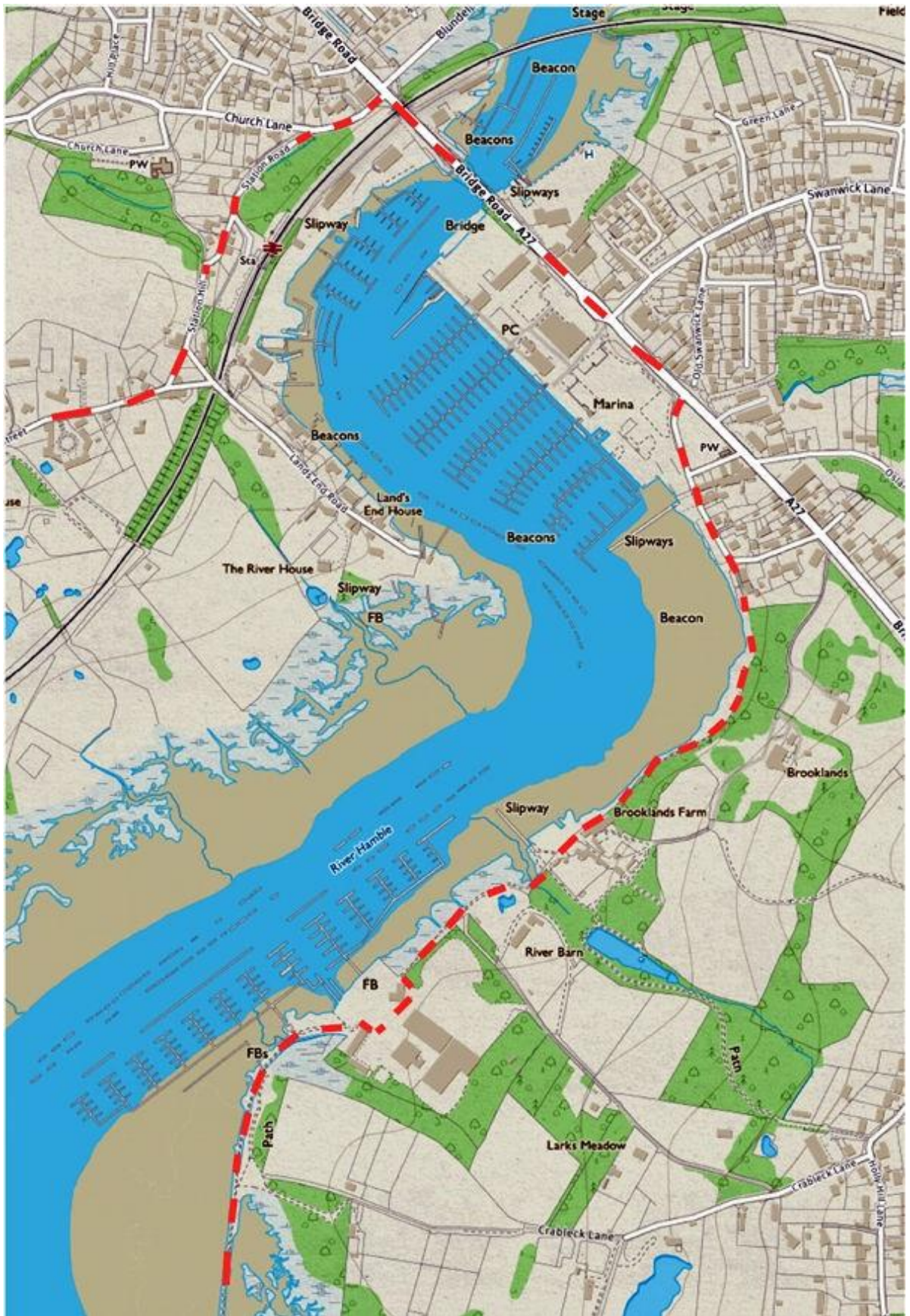
HRVF hopes in the future opportunities can be taken to make the path on the west side closer to the river and extend above the A27 road bridge to Botley.

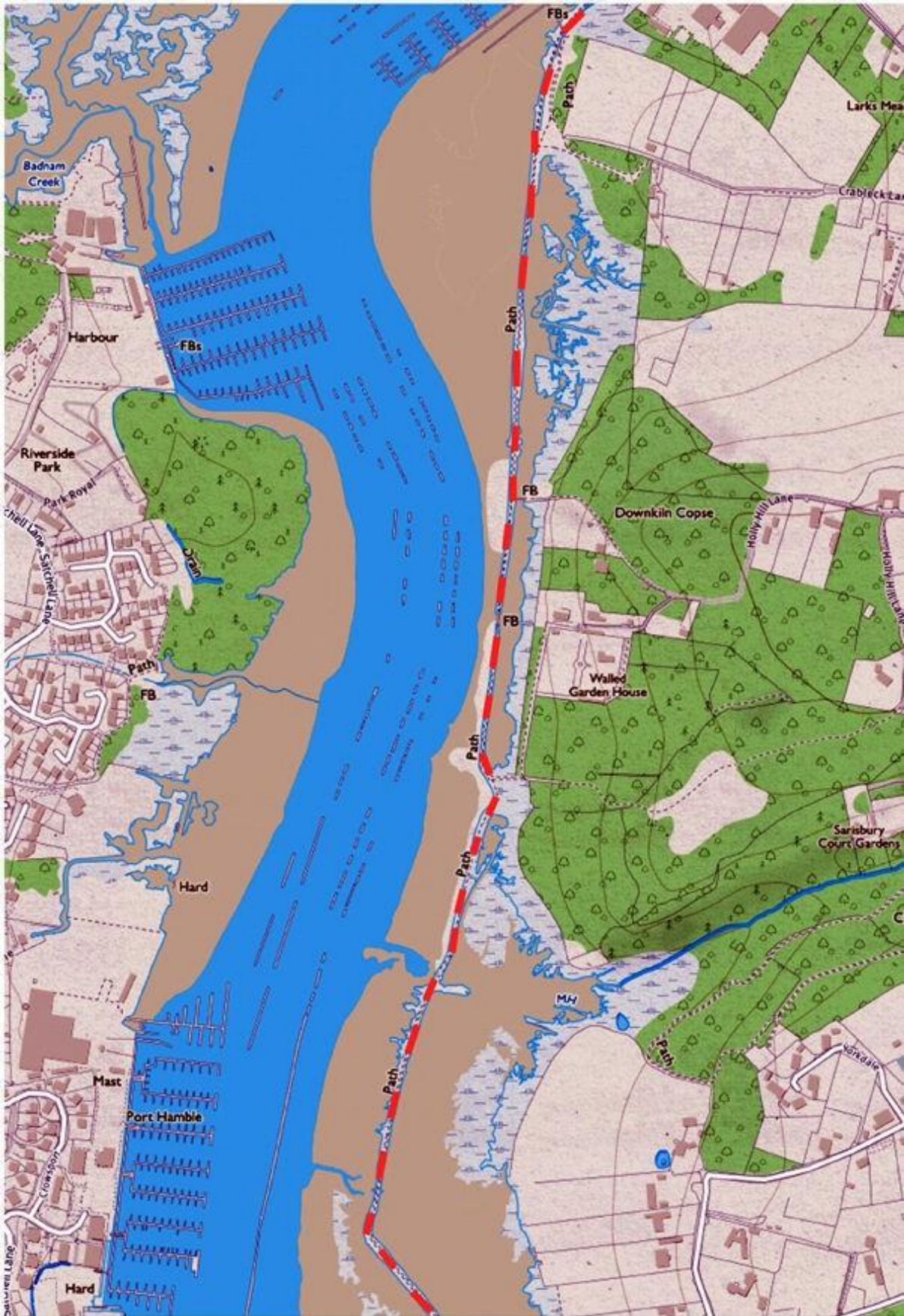


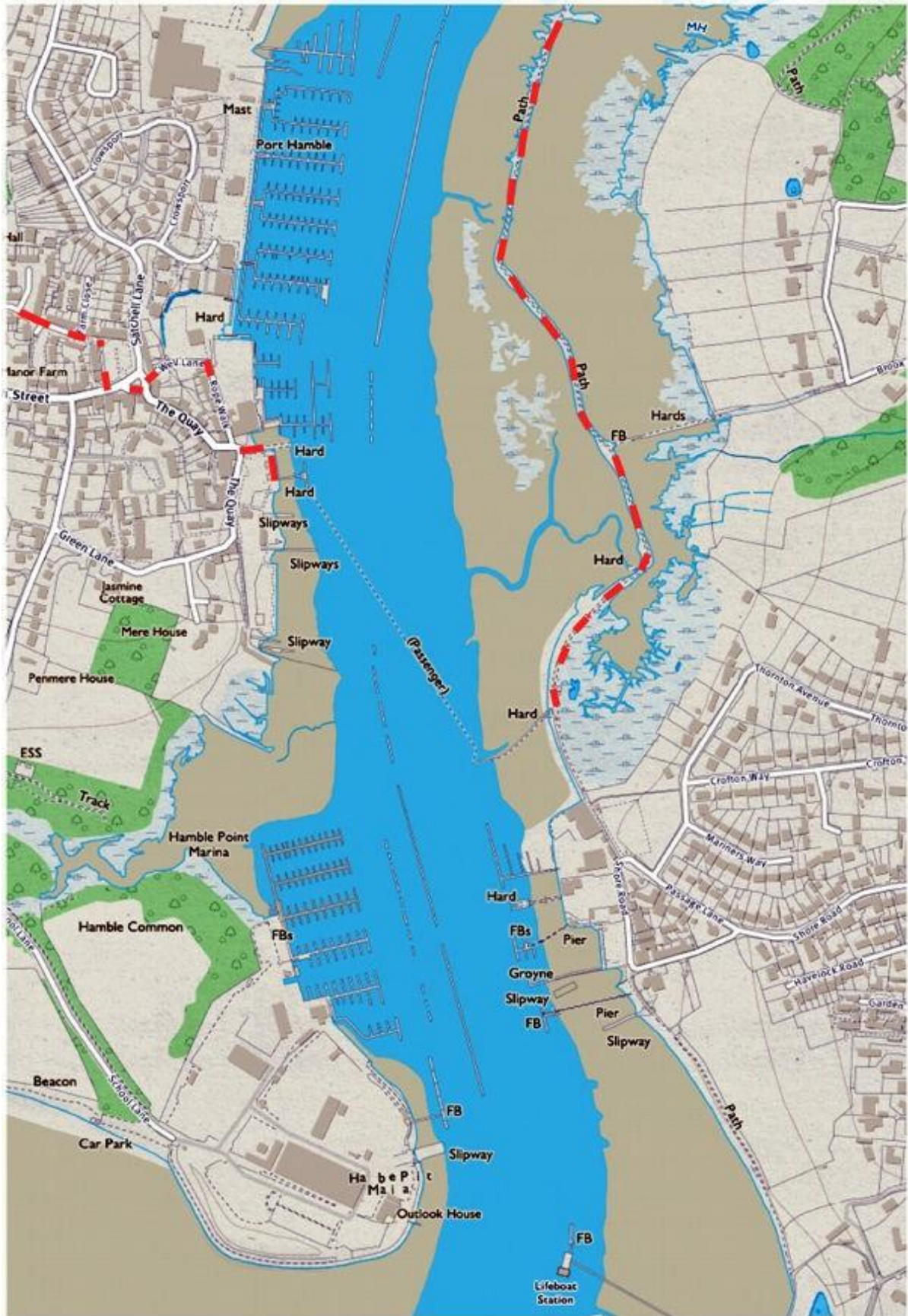












5.5 Annotated Map of Hamble Common showing breeding Nightjar territories (provided by [redacted] of Hamble Conservation Volunteers).

