

Coastal Access – Cleveleys to Pier Head, Liverpool: CPH1, CPH2 and CPH3



Representations

March 2022

1. Introduction

This document records the representations Natural England has received on the proposals in length reports CPH1, CPH2 and CPH3 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 Cleveleys to Pier Head, Liverpool they are included here in so far as they are relevant to lengths CPH1, CPH2 and CPH3 only.

2. Background

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

In total, Natural England received thirty-two representations pertaining to length reports CPH1, CPH2 and CPH3, of which thirteen were made by organisations or individuals whose representations must be sent in full to the Secretary of State in accordance with paragraph 8(1)(a) of Schedule 1A to the National Parks and Access to the Countryside Act 1949. These 'full' representations are reproduced in Section 3 in their entirety, together with Natural England's comments. Also included in Section 3 is a summary of the nineteen representations made by other individuals or organisations, referred to as 'other' representations. Section 4 contains the supporting documents referenced against the representations.

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

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

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

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

Representation number:

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

Organisation/ person making representation:

[REDACTED], Historic England

Route section(s) specific to this representation:

Not specified

Representation in full

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

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

Natural England's comments

Natural England is grateful for this confirmation from Historic England.

Relevant appended documents (see section 5):

None supplied

Representation number:

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

Organisation/ person making representation:

[REDACTED], The Ramblers

Route section(s) specific to this representation:

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

Representation in full

We support the principle that some areas of spreading room along the proposed route of the ECP may have restrictions and exclusions. We also accept the principle that, where

appropriate, some use may be made of salt-marshes for the route of the ECP in line with the guidance given in the Approved Scheme paras 7.8 pp77-79, and para 7.15 pp96-100. However, we are concerned that access to much of the land between the coast path and the sea has been restricted in some form.

We are concerned that the lack of any resources for monitoring and enforcement has led to undue and unfair restrictions being proposed for ECP walkers. We consider that NE is being forced to rely on exclusionary directions due to a lack of resource to promote the Countryside Code and responsible access, in a way that was not the intention of the Marine and Coastal Access Act and that, if these resources were available, access for walkers (perhaps without dogs) could be managed in some areas without adverse impacts.

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

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

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

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

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

The mapping basis used for many of these Directions is out of date. The river channels have changed substantially, sand banks have moved position and continue to do so on an almost

daily basis. Consequently, many of the Direction maps include semi-permanent stretches of water, and many omit to cover spreading room which now exists and is adjacent to the Direction land, and these allow access to ECP walkers!

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

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

CPH 2A this seems to be very draconian with the whole of the area on Clifton Marsh being declared out of bounds. We are aware that it contains two SSSIs, a waste water treatment works and a waste disposal site, but are surprised that it does not allow for any access at all. Some form of access to some or all of the flood defence embankments ought to be possible and if a part does give rise to an issue then the provision of field paths ought to be achievable.

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

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

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

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

Natural England's comments

General responses

Natural England appreciates concerns expressed as to the extent of restrictions and exclusions affecting the coastal margin (and, in some cases, the trail itself). We are obliged to make use of the least restrictive option when considering ways to mitigate against various impacts. However, we are also obliged to follow the precautionary principle in relation to impacts relating to designated sites and protected species; where we cannot safely conclude that no impact on these sites and species will arise as a result of new access rights, we must

restrict or remove those new rights as a last resort, assuming that no other mitigation measures are deemed feasible or sufficient. However, all long-term restrictions and exclusions must be regularly reviewed – and will be removed or relaxed if evidence supports such action.

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

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

Responses relating to specific restrictions maps

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

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

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

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

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

Relevant appended documents (see section 5):

None supplied

Representation number:

MCA/CPH/W/R/4/0016

Organisation/ person making representation:

[REDACTED], The Open Spaces Society

Route section(s) specific to this representation:

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

Representation in full

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

Natural England's comments

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

Relevant appended documents (see section 5):

None supplied

Representation number:

MCA/CPH1/R/6/1629

Organisation/ person making representation:

[REDACTED], The Ramblers

Route section(s) specific to this representation:

All, as listed below

Other reports within stretch to which this representation also relates:

CPH 2

Representation in full

GC/2020/17

We support NE's proposed route from CPH-1-S001 to CPH-1-S003

Regarding CPH-1-S004 and CPH-1-S005 the proposed route will be good in the event of bad weather, but when the weather is calm an alternative exists nearer the sea, this being the Promenade, which will give a better experience for users of the Coast Path. In our view, the best way forward is to have a main route near the sea on the Promenade, with an alternative route using the route indicated on the maps.

We also support the proposed route CPH-1-S006 to CPH-1-S113.

We are pleased to see access being created at Brook Cottage so avoiding the walk inland and then back out – CPH-1-S079 to CPH-1-S083, which are five short sections in order to gain access to cross a stream.

CPH-1-S114 to CPH-1-S129 is the practical route that the walking public presently use and we can see the likely reasons why this route has been chosen for the Coast Path. A public right of way – Freckleton Footpath 14 exists nearer to the water but parts of it are in a dreadful condition, with it being waterlogged at Naze Point. However, if the southern part of Freckleton Footpath 14 can be repaired it would be a better route for the Coast Path. (The northern part of Freckleton Footpath 14 is in usable condition, this being used for sections CPH-1-S131 and CPH-1-S132).

For CPH-1-130 to CPH-1-S135 we can accept the proposed route, but at the end of CPH-1-S135 is where we are of the opinion that report CPH-1 should end.

If our comments about report CPH-2 are accepted then CPH-1-S136 to CPH-1-S143 will become redundant and can therefore be deleted. If our comments on report CPH-2 are rejected then we would support the route for CPH-1-S136 to CPH-1-S143.

Natural England's comments

We are grateful for the message of support.

CPH-1-S004 and CPH-1-S005: We considered the route slightly closer to the sea, but concluded that the proposed route was more suitable overall. The more seaward area of promenade will be available to walkers, many of whom will probably chose to walk that way, sea conditions permitting.

CPH-1-S114 to CPH-1-S129: We also considered the existing public footpath in this area, as a possible route for the ECP. However, this footpath is largely on saltmarsh and is in extremely poor condition, as has been noted. Bringing the footpath up to a minimum acceptable standard for the ECP would be problematical in terms of construction, but would also give rise to considerable concerns in terms of loss of protected habitat within or on the very edge of a designated site. On this basis, and given the availability of a nearby suitable alternative, we ruled out the route over the marsh.

CPH-1-S136 to CPH-1-S143: Our response is set out in the record of representations for CPH 2.

Relevant appended documents (see section 5):

None supplied

Representation number:

MCA/CPH1/R/7/0016

Organisation/ person making representation:

[REDACTED], The Open Spaces Society

Route section(s) specific to this representation:

As above

Other reports within stretch to which this representation also relates:

CPH 2

Representation in full

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

Natural England's comments

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

Relevant appended documents (see section 5):

None supplied

Representation number:

MCA/CPH1/R/9/1654

Organisation/ person making representation:

[REDACTED], Lancashire Local Access Forum

Route section(s) specific to this representation:

Not specified – but taken to be CPH-1-S114 to CPH-1-S143 inclusive

Other reports within stretch to which this representation also relates:

CPH 2

Representation in full

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

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

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

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

The route takes a line away from the coast, inland alongside Dow Brook, to a junction with Preston

New Road. We would prefer a route which continues, where feasible, to keep closer to bank of the River Ribble. We will continue this theme in our remarks in CPH 2.

Natural England's comments

Natural England is grateful for the support of Lancashire Local Access Forum.

We thoroughly investigated options for a route closer to the Ribble Estuary, between Freckleton and Preston, but concluded that this was not possible for a range of reasons including safety, land management and nature conservation. The proposals therefore include a route on the west side of Freckleton Pool/Dow Brook as far north as the A584.

We understand that this will be a disappointing outcome for those who were anticipating a new path in this area, perhaps much closer to the estuary.

Relevant appended documents (see section 5):

Draft Minutes of the Lancashire Local Access Forum [LLAF] held on 24th November 2020.

Representation number:

MCA/CPH 2/R/1/1629

Organisation/ person making representation:

[REDACTED] (The Ramblers)

Route section(s) specific to this representation:

All, as listed below

Other reports within stretch to which this representation also relates:

N/A

Representation in full

We consider that CPH-2-S001 to CPH-2-S009 to Savick Brook is unacceptable as a proposed route for it uses the verge of dual carriageway, which will make for a very miserable walking experience. If this does become the actual route for the Coast Path then we can see some walkers deciding to take the bus from Freckleton to Lea Gate rather than walk next to a busy main road.

Instead we propose that the route should be on the flood defence embankment as much as practicable, from the end of CPH-1-S135 to use the farm track to cross the top of Freckleton Pool, then going down the eastern side of Freckleton Pool, ideally to the SW corner of the embankments. If this is deemed to be sensitive then at grid ref SD43472803 it will be

possible to turn east along a farm track as far as grid ref SD43732812, where it would then turn south again to get to the flood defence embankment next to the River Ribble.

It should then continue along the River Ribble, passing the Waste Water Treatment Work, and then continue on the flood defence embankments and then up the side of Savick Brook. The maps 2a to 2d inclusive do not show the River Ribble, which illustrates how far the proposed route is away from the River.

If for some reason the route proposed in the previous two paragraphs should be deemed undesirable then a cross field path should be provided, away from the main road. From the end of CPH-1-S135 at Dibbs Pocket, the route should head down the farm track probably to grid ref SD44112858, but then turning east, thus avoiding Grange Farm, and then to reach the minor road that serves the Water Treatment Works and Suez Waste works.

From the minor road it should head south towards the Water Treatment Works, but go round it to get to the flood defence embankment which should be followed to Savick Brook and onto Lea Gate. We note that the SSSI is on the south bank of the River and not the whole River, with only the SW corner of Clifton Marsh being a SSSI.

We support NE's proposed route from CPH-2-S010 to CPH-2-S017 on the edge of Lea Marsh and we are pleased to see some new access is being created as part of the Coast Path.

Regarding CPH-2-S018 a better route would be to initially head west at grid ref SD48762925, along the northern edge of the motor racing site to grid ref SD48572920, then turn south to grid ref SD48572897, for a good gap exists between the two unsurfaced tracks, then head east on the River bank to the south east corner of the site. Some bramble clearance work will be needed to keep the route above the high water mark. (Walkers presently making use of this access land use a route that on the highest of high tides is just below the high water mark.) This proposed route will give a much better walking experience next to the River. Then if this is accepted, this route would pick up CPH-2-S023 by the former Docks.

If it is decided to stick with CPH-2-S018 as shown, then there is a need to confirm that the route will be between the main racing complex and the Waste Processing Site, which is likely to involve clearing trees and shrubs, for it is noted that the security around the motor racing complex has been improved in recent years. Should the Coast Path take this route then CPH-2-S019 to CPH-2-S022 on Wallend Rd is acceptable.

The route on CPH-2-S023 to CPH-2-S040 is acceptable, which the public are already using.

We would agree with the Maps CPH 2C and CPH 2D that these are places where walkers would not normally be seeking access.

Natural England's comments

CPH-2-S001 to CPH-2-S009: We understand the view that the proposed route on the roadside is not ideal and will not provide a particularly pleasant walking experience. From the outset of our planning on this stretch of coast, we identified the north bank of the Ribble as being one of the key areas for potential access improvements. Despite many visits to this area, we were unable to identify any other viable options. The suggested modification was considered as part of this process – indeed, the flood embankment would ordinarily be the obvious and preferred choice for the ECP in such circumstances. However, the risk of

disturbance to protected birds is high on the side of the estuary, particularly towards the western end of this area, with a narrow strip of marsh and flat between the tidal channel and the embankment. Perhaps the greatest challenge towards the eastern end of this area is the large landfill site; there is insufficient space to create a path on the seaward side of this site without moving the existing security fencing inland by several meters. The ground conditions were also poor, most likely caused by run-off of surface water from the adjacent landfill site, with considerable path surfacing required as a result. The predicted cost of these works, especially if coupled with the high cost of any new bridge over the southern end of Savick Brook, meant that we regrettably had to discount this option.

We also carefully considered aligning the trail on the various agricultural and access tracks that cross the Freckleton, Clifton and Newton marshes, as also suggested in this representation. We were made aware of various issues and concerns, including heavy vehicle movements on some tracks, stock movements on others, high risk of disturbance to birds in many areas and a risk to low-flying aircraft arising from bird disturbance.

We hope that opportunities for a more pleasant coast path route may arise in the future, perhaps as a result of changes in land use. If so, a variation report might be prepared and published.

CPH-2-S018: East of Savick Brook, the developed and actively used area of the wider common is actually much greater than indicated by many maps (and further development is anticipated imminently). In reality, there are few parts of this site that would provide any safe and appealing access opportunities for walkers. We explored the possibility of a route along the very edge of the estuary but concluded that, whilst this may have been possible, it was not justified given the difficulty and expense in bridging Savick Brook and the lack of any ongoing riverside path opportunity to the west of Savick Brook. We recognise that considerable clearance and establishment work would be required in relation to the proposed route in this area – this has been included in our planning work.

Relevant appended documents (see section 5):

None supplied

Representation number:

MCA/CPH2/R/3/0016

Organisation/ person making representation:

[REDACTED] (The Open Spaces Society)

Route section(s) specific to this representation:

As above

Other reports within stretch to which this representation also relates:

N/A

Representation in full

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

Natural England's comments

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

Relevant appended documents (see section 5):

None supplied

Representation number:

MCA/CPH2/R/7/1654

Organisation/ person making representation:

[REDACTED] (Lancashire Local Access Forum)

Route section(s) specific to this representation:

Not specified

Other reports within stretch to which this representation also relates:

N/A

Representation in full

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

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

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

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

The route continues alongside Preston New Road, well away from the coast. This road serves, in particular, one of the major employers in Lancashire, British Aerospace at Warton. The road is extremely busy. There have been plans, not yet implemented, to construct cycle ways into Preston, to help to segregate cyclists and vehicular traffic. The road is very busy and straight. Vehicles travel at, or above, the speed limit of 70mph. The section along this busy road is more than 3km in length. It is not desirable as a section of the England Coast Path. It would be unpleasant to walk, as well as being potentially dangerous. We believe that an alternative route should be actively investigated within the area shown in pink in Direction Map CPH 2a. There would appear to be several potential alternatives. We feel that our arguments for an alternative route outweigh the land management issues which are proffered in the report.

The route eventually moves away from the A584, southwards along Savick Brook. Ironically, it does not meet the coast because it runs along the northerly boundary of the

Trax racing circuits, the reason given being the potential proximity of walkers and fast-moving vehicles. Yet the number of hours when the circuits are in use are tiny in comparison with the private car, HGV and other 70+ mph vehicles on the A584. We believe that a safe route could be constructed alongside the River Ribble, with appropriate fencing to separate walkers and the TRAX site, perhaps with simple but adequate user-management procedures. This would provide a much more continuous, pleasant riverside walking experience. The area is quite close to Preston, which is a fast-growing university city. Much work has been completed in and around Preston to create pleasant off-road outdoor experiences for walkers, cyclists and horse riders. The Preston Guild Wheel is a prime example. This section of the England Coast Path should be considered as part of the modern development of a clean, environmentally-friendly and attractive Preston City.

Natural England's comments

Natural England is grateful for the support of Lancashire Local Access Forum.

We fully understand the desire for a route much closer to the north shore of the Ribble Estuary; we investigated various options in this area, at some length, but were unable to identify any more seaward route that met the criteria within the approved Scheme and which would have been feasible without disproportionate cost. Whilst the proposed route is perhaps not ideal, we believe that it is the best option available at this time.

We hope that opportunities for a more pleasant coast path route may arise in the future, perhaps as a result of changes in land use. If so, a variation report might be prepared and published.

We should clarify that the proposed route sections CPH-2-S001 to S009 inclusive are on roadside pavements, often separated from the carriageway by a strip of grass. Whilst parts of this path are currently overgrown with vegetation due to lack of use, the path would be cleared and improved as part of any establishment in this area.

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

Relevant appended documents (see section 5):

Draft Minutes of the Lancashire Local Access Forum [LLAF] held on 24th November, 2020.

Representation number:

MCA/CPH3/R/5/0160

Organisation/ person making representation:

[REDACTED] (Lancashire County Council)

Route section(s) specific to this representation:

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

Other reports within stretch to which this representation also relates:

CPH 4

Representation in full

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

Access to 3-S042 on the eastern bank can be gained via Public Right of Way 7-8-FP1
Access to 4-S001 on the western bank at Tarleton Lock is via the canal bank from Plox Brow, which is not a recorded Public Right of Way.

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

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

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

Natural England's comments

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

The southern end of CPH 3 is connected to other routes by the continuation of the public footpath following the same line as the proposed ECP route. On the western side of the River Douglas, an existing public footpath links Sutton Avenue with the midpoint of CPH-4-S005. Whilst the unintended gap in the proposed route is far from ideal, these linking routes do present some options for those intent on continuing a journey along the coast path in this area. We will aim to identify safe and practical options prior to commencement, if required, and consider how best we can communicate these effectively.

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

such stakeholders with the aim of creating a partnership approach to the delivery of a new bridge.

Relevant appended documents (see section 5):

None supplied

Representation number:

MCA/CPH3/R/6/1629

Organisation/ person making representation:

[REDACTED] (The Ramblers)

Route section(s) specific to this representation:

All, as listed below

Other reports within stretch to which this representation also relates:

N/A

Representation in full

The proposed route in this Chapter will not create any new access, but will instead use either existing public rights of way and or which the public already have access to, these places being by custom.

We support NE's proposed route from CPH-3-S001 to CPH-3-S014, which uses routes that the public already uses.

The proposed route on CPH-3-S015 to CPH-S-S017 uses existing rights of way but we consider that better alternatives are available nearer the coast, on the flood defence embankments. From grid ref SD46492793 continue along the flood defence embankment to grid ref SD46192704, where the preferred route is to use the new outer embankment to give good views over the estuary. If this gives rise to an issue then it would be possible to use the old embankment to grid ref SD45832637, and then to resume the route as proposed.

We understand the logic used to decide the exclusion areas on Maps CPH 3A to CPH 3D inclusive as land that is unsuitable for normal access by the public, because of the marsh land, but we are aware that some members of the public do venture out onto this land, presumably either with local knowledge or with good instructions.

We have concerns regarding Map CPH 3E. An attempt was made to reclaim Hutton Marsh about a century ago, but these flood defence embankments were abandoned, with the line then reverting to the previous flood defence embankments. The 1950s OS Map shows gaps in this outer flood defence embankment. This land was then included in the SSSI designation. However in recent years a further attempt was made to provide new embankments / repair the flood defence embankments, which appears to have succeeded with agricultural land now being used behind these flood defence embankments. With the new embankments now enclosing agricultural land, a far better experience is to be gained by giving access to the flood defence embankments (see maps below).

We support NE's proposed route from CPH-3-S018 to CPH-3-S021, which uses routes that the public already uses, these being public footpaths on S018, S019 and S020, whilst S021 on the flood defence embankment is presently available for use by custom.

For the sections CPH-3-S022 to CPH-3-S029 which again is proposed to use existing public rights of way we consider that a better route would be to go down the western side of the former Longton tip, which ceased operations many years ago, from grid ref SD45782473 to grid ref SD45892386. This area has been grassed over, which is now used for the grazing of animals.

We support NE's proposed route from CPH-3-S029 to CPH-3-S042, which uses existing public footpaths.

We note the inference that a bridge ought to be provided over the River Douglas near Tarleton Lock. The advantage of this location is that at this point the River Douglas has in recent times only been used by canoes and other small craft, which means that the clearance required over the River will be less. However until such time as this bridge is built it would probably be useful information for walkers about the Coast Path if the guide mentions where the bus stops in Much Hoole and Tarleton are, together with details of the number 2 bus service (part of the Preston to Southport route) that connects these two points.

Natural England's comments

Natural England is grateful for the message of support.

CPH-3-S015 to CPH-S-S017: We are directed to make use of existing coastal paths where these meet the criteria within the coastal access Scheme. Whilst the sections in question are not particularly close to the coast, we concluded that there are no significantly more seaward routes that would be viable. This point is also covered by our response relating to the CPH (W) representation from the Ramblers (CPH 3E).

CPH-3-S022 to CPH-3-S029: We considered the option raised by the Ramblers but concluded that ground conditions were unfavourable and the cost of establishing a route on this line would outweigh the advantages.

We agree with the suggested use of a local bus service as one means of continuing along the route, in the absence of a new bridge over the River Douglas; we are considering ways in which such information might be usefully communicated to walkers, when the stretch is launched.

Relevant appended documents (see section 5):

MAPS OF HUTTON MARSH Taken from Lancashire County Council's MARIO System - Nov 20

Representation number:

MCA/CPH3/R/8/0016

Organisation/ person making representation:

[REDACTED] (The Open Spaces Society)

Route section(s) specific to this representation:

As above

Other reports within stretch to which this representation also relates:

N/A

Representation in full

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

Natural England's comments

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

Relevant appended documents (see section 5):

MAPS OF HUTTON MARSH Taken from Lancashire County Council's MARIO System - Nov 20

Representation number:

MCA/CPH3/R/11/1654

Organisation/ person making representation:

[REDACTED] (Lancashire Local Access Forum)

Route section(s) specific to this representation:

Not specified

Other reports within stretch to which this representation also relates:

CPH 4

Representation in full

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

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

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

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

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

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

Natural England's comments

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

Relevant appended documents (see section 5):

Draft Minutes of the Lancashire Local Access Forum [LLAF] held on 24th November, 2020.

4. Summary of 'other' representations, and Natural England's comments on them

Representation ID:

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

Organisation/ person making representation:

[REDACTED], Cycling UK

Name of site:

N/A

Report map reference:

N/A

Route sections on or adjacent to the land:

N/A

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

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

Relevant appended documents (see Section 5):

None supplied

Representation ID:

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

Organisation/ person making representation:

[REDACTED], Merseyside Environmental Advisory Service (MEAS)

Name of site:

N/A

Report map reference:

Overview index map

Route sections on or adjacent to the land:

N/A

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

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

Relevant appended documents (see Section 5):

None supplied

Representation ID:

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

Organisation/ person making representation:

[REDACTED], United Utilities

Name of site:

Not specified

Report map reference:

Map A (Overview)

Route sections on or adjacent to the land:

Not specified

Summary of representation:

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

Natural England's comment:

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

Relevant appended documents (see Section 5):

None supplied

Representations containing similar or identical points

Representation ID

Organisation/ person making representation:

MCA/CPH1/R/2/1026

[REDACTED]

MCA/CPH1/R/3/1160

[REDACTED]

Name of site:

Naze

Report map reference:

GC/2020/17

CPH 1q

Route sections on or adjacent to the land:

CPH-1-S124 to S127

Other reports within stretch to which this representation also relates

N/A

Summary of point: The representations both ask that existing kissing gates be retained, order to facilitate stock control.

Natural England's comment: We have consulted with the access authority, Lancashire County Council, over this matter. Its response is that the existing gates form an unnecessary obstruction on the public footpath and should be removed for that reason. Natural England has no strong views on the matter, but would fund the replacement of the gates with more accessible designs if this is deemed acceptable and feasible by the county council and the landowners.

Relevant appended documents (see Section 5):

Attachment 1 to [redacted] Representation

Attachment 1 to [redacted] Representation

Representation ID:

MCA/CPH1/R/1/1563

Organisation/ person making representation:

[REDACTED], BAE Systems

Name of site:

Warton Airfield

Report map reference:

CPH 1o to CPH 1r

Route sections on or adjacent to the land:

CPH-1-S088 to CPH-1-S110 inclusive

Other reports within stretch to which this representation also relates

N/A

Summary of representation: The representation stresses the requirement to maintain a buffer between the airfield perimeter fence and any development. It goes on to request that further consultation should occur, if the proposed route were to deviate from the existing public right of way.

Natural England's comment: Lancashire County Council will hold further discussions with owners and occupiers, as well as with any other key stakeholders, before establishment works are undertaken.

The proposed route in the vicinity of the airfield perimeter generally follows the line currently being used as the public footpath (although this differs in places from the definitive line of the public right of way, which often does not exist on the ground). Minor adjustments may be required, on establishing any approved route in this area, to avoid any very localised ground condition issues. However, we would expect the pattern of access around the airfield to be broadly unchanged and would therefore not expect our proposals to give any fresh cause for concern.

Relevant appended documents (see Section 5):

Letter dated 16th November 2020 on behalf of BAE Systems (Operations) Limited, signed by [redacted]. FM Engineering and Governance Manager.

End of representation

Representation ID:

MCA/CPH1/R/4/0725

Organisation/ person making representation:

[REDACTED]

Name of site:

Naze Mount Farm to Naze Lane East

Report map reference:

CPH 1q

Route sections on or adjacent to the land:

CPH-1-S113 FP to CPH-1-S123 FP

Other reports within stretch to which this representation also relates

N/A

Summary of representation: The representation comments on the infrastructure rather than the proposed route, and the impacts of this infrastructure on [redacted] as landowner.

Natural England's comment: We are grateful to [redacted] for the careful consideration of our proposals and detailed notes submitted. We note the suggestions made for changes to specific items of infrastructure and will discuss these with Lancashire County Council, prior to establishment works getting underway. New stiles will not be installed as part of the England Coast Path, due to these presenting a barrier to less mobile users. However, it may well be possible to install suitable kissing gates in some or all locations, in place of the suggested pedestrian gates.

Relevant appended documents (see Section 5):

[redacted] – Attachment 1

Representation ID:

MCA/CPH1/R/5/1536

Organisation/ person making representation:

[REDACTED], Freckleton Parish Council

Name of site:

Parish of Freckleton

Report map reference:

CPH 1p, 1q & 1r

Route sections on or adjacent to the land:

CPH-1-S110 to CPH-1-S143

Other reports within stretch to which this representation also relates

N/A

Summary of representation: The representation expresses support for the concept of the coast path, but also carefully details some of the suggested hazards and requirements for improvement to infrastructure and path surface, throughout the parish.

Natural England's comment: We are grateful for the detailed information provided and will share this with Lancashire County Council, for consideration prior to establishment works getting underway. We would expect many, if not all, of these issues to be resolved during the establishment phase, but we note that continued maintenance will be necessary so as to ensure that the trail remains open and accessible. Such ongoing maintenance is expected to be carried out by the access authority, or a Trail Partnership, with significant ongoing funding provided by government.

Relevant appended documents (see Section 5):

Freckleton PC Coast Path Representation

Representation ID:

MCA/CPH1/R/8/0008

Organisation/ person making representation:

[REDACTED], Disabled Ramblers

Name of site:

Various locations on length

Report map reference:

CPH 1j, 1m, 1n, 1o, 1p, 1q & 1r.

Route sections on or adjacent to the land:

CPH-1-S038 to CPH-1-S042, CPH-1-OA012 to CPH-1-OA018, CPH-1-S044 to CPH-1-S048, CPH-1-OA022, CPH-1-S067, CPH-1-S077 to CPH-1-S084, CPH-1-S133 and CPH-1-S134 – and others not specifically listed.

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

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

Various changes to specific suggested infrastructure items are requested.

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

Relevant appended documents (see Section 5):

The Disabled Ramblers Document: Man-made Barriers and Least Restrictive Access

Representation ID:

MCA/CPH2/R/2/1679

Organisation/ person making representation:

[REDACTED]

Name of site:

Freckleton Marsh

Report map reference:

Maps CPH 2a and CPH 2b

Route sections on or adjacent to the land:

Not specified

Other reports within stretch to which this representation also relates

N/A

Summary of representation: The representation fundamentally disagrees with the proposed route which follows the A584 roadside pavement between Freckleton and the western edge of Preston. Natural England's given reasons for not proposing a more southerly route, through the area south of the A584, are questioned. A modification is suggested (and partly shown in the map appended to the representation), which would make use of existing farm tracks.

Natural England's comment: The suggested modification is entirely logical, when considering a map of this area, and it was one of the options that we investigated. Whilst not providing direct views to the Ribble Estuary, it would be closer to the coast and probably

afford a more pleasant walking experience. However, we identified various issues, including regular movement of dairy cattle along this route (twice daily). One of the critical factors in the decision to avoid new access rights in this area was the risk of disturbance to birds arising from walkers (particularly with dogs), and the consequent serious risk to aircraft taking off and landing at the adjacent BAE airfield.

Relevant appended documents (see Section 5):

Map (AO map)

Representation ID:

MCA/CPH2/R/4/0008

Organisation/ person making representation:

[REDACTED] (Disabled Ramblers)

Name of site:

Various – north bank of Ribble Estuary

Report map reference:

CPH 2d, 2e & 2f

Route sections on or adjacent to the land:

CPH-2-S011, CPH-2-S012, CPH-2-S018 & CPH-2-S036 – and others not specifically listed.

Other reports within stretch to which this representation also relates

N/A

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

Various changes to specific suggested infrastructure items are requested.

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

Relevant appended documents (see Section 5):

The Disabled Ramblers Document: Man-made Barriers and Least Restrictive Access

Representation ID:

MCA/CPH2/R/5/0223

Organisation/ person making representation:

[REDACTED] (Preston City Council)

Name of site:

Lea Marsh

Report map reference:

CPH 2d

Route sections on or adjacent to the land:

CPH-2-S016

Other reports within stretch to which this representation also relates

N/A

Summary of representation: The representation notes that the route is aligned on a flood embankment, which was installed by Preston City Council but owned by a third party. It asks that the proposals are discussed with the landowner and also notes that the bund may need to be raised in the future.

Natural England's comment: We can confirm that the owners and occupiers of this land have been kept informed of our proposals, in development and as published. We note the advice that future works may be required on the embankment. A temporary access exclusion might be put in place, if required, to allow works to be carried out (with a diversion along the proposed optional alternative route).

Relevant appended documents (see Section 5):

None supplied

Representation ID:

MCA/CPH2/R/6/0013

Organisation/ person making representation:

[REDACTED] (National Grid)

Name of site:

Not specified

Report map reference:

CPH 2c, CHP 2d, CPH 2e, CHP 2f (and CPH 3c & CPH 3e)

Route sections on or adjacent to the land:

Not specified

Other reports within stretch to which this representation also relates

CPH 3

Summary of representation: The representation notes that the proposed route is close to various National Grid assets and asks that further information be supplied to National Grid's risk management team.

Natural England's comment: Given that establishment of the England Coast Path is minimal and very localised, we would not anticipate any risk arising from proximity to National Grid infrastructure. We would expect Lancashire County Council, who will be responsible for any ECP establishment works, to follow all relevant legislation and best practice. Further communications with affected landowners will precede the works.

Relevant appended documents (see Section 5):

'NG Assets – coastal path' map

Representation ID:

MCA/CPH2/R/8/0223

Organisation/ person making representation:

[REDACTED] (Preston City Council)

Name of site:

Newton and Clifton marshes, Wallend Road, Lockside Road

Report map reference:

CPH2a, CPH2d, CPH2e & CPH2f

Route sections on or adjacent to the land:

CPH-2-S018 and S034 to S037

Other reports within stretch to which this representation also relates

N/A

Summary of representation: The representation draws our attention to three occupancies of land owned by the city council, at Newton and Clifton marshes and at Wallend Road. In each case, it requests that the occupiers be consulted in relation to the proposal.

The representation then goes on to advise of an intention to develop land adjacent to the proposals route, at Lockside Road. This may require some adjustment to the proposed route, if approved and implemented.

Natural England's comment: We are grateful for the advice and can confirm that all concerned parties have been informed of our proposals, during development and at publication.

As subsequently discussed, we confirm that we would fully expect to hold further discussions with all stakeholders, should any part of the route at Lockside Road need to be adjusted in the future. Approval and establishment of the England Coast Path does not prevent lawful development.

Relevant appended documents (see Section 5):

Plans 2, 3 & 4

Surrender of land part of Grange Farm
Agricultural tenancy Grange Farm
Lease to United Utilities land adj to Grange Farm
Lease of land at Wallend Road

Representation ID:
MCA/CPH3/R/1/1656

Organisation/ person making representation:
[REDACTED]

Name of site:
Not specified

Report map reference:
CPH 3h

Route sections on or adjacent to the land:
Not specified

Other reports within stretch to which this representation also relates
CPH 4

Summary of representation: The representation asks that any new bridge over the River Douglas be suitable for cyclists as well as pedestrians. It also suggests that the most appropriate location for a new bridge is at Beconsall.

Natural England's comment: We agree entirely that it makes sense for any new bridge to serve the needs of both walkers and cyclists, subject to any other considerations such as feasibility of adjoining routes. We will continue to stress the importance of this during any ongoing discussions with stakeholders over a potential new bridge.

We can confirm that the site of the disused railway bridge at Beconsall has been considered by Lancashire County Council, in terms of a viable location for a new pedestrian/cycle bridge. Whilst there are some advantages to this location, the span between the existing abutments is considerable.

Relevant appended documents (see Section 5):
None supplied

Representation ID:
MCA/CPH3/R/2/0810

Organisation/ person making representation:
[REDACTED]

Name of site:
The River Douglas lower tidal reaches

Report map reference:

CPH 4a

Route sections on or adjacent to the land:

Not specified

Other reports within stretch to which this representation also relates

CPH 4

Summary of representation: The representation is supportive of the England Coast Path, but requests that a bridge be delivered as part of the project, across the River Douglas (but that any such new bridge should be designed so as not to hinder navigation). It also asks that United Utilities be encouraged to remove the defunct pipe bridge over the river.

Natural England's comment: We agree that a new bridge over the River Douglas is the only satisfactory solution to the discontinuity of the route, as proposed, and should be regarded as a high priority by all stakeholders. We will continue to engage with such stakeholders with the aim of creating a partnership approach to the delivery of a new bridge. We note the point about potential hindrance to navigation; we know that Lancashire County Council are aware of this constraint.

We have no powers to compel United Utilities to remove the disused pipe bridge; however, we will raise it in any relevant discussions.

Relevant appended documents (see Section 5):

Appended letter, giving details of representation

Representation ID:

MCA/CPH3/R/3/1331

Organisation/ person making representation:

[REDACTED]

Name of site:

Not specified

Report map reference:

CPH 3i

Route sections on or adjacent to the land:

CPH-3-S040

Other reports within stretch to which this representation also relates

CPH 4

Summary of representation: The representation does not favour a new bridge over the River Douglas, suggesting instead that the route should utilise the existing A59 road bridge.

Natural England's comment: We considered, at some length during the planning stage for the coast path project, whether it would be possible to incorporate the existing road

bridge into a continuous route for the trail. However, we concluded that it would not be safe to promote such a route. The only pedestrian walkway on the road bridge is up on the upstream side; utilising this walkway as part of the England Coast Path would involve several very risky crossings over the busy main roads in the vicinity. The highways authority agreed that this would not be safe without very considerable road engineering schemes, which are beyond the remit of the coastal access programme.

Relevant appended documents (see Section 5):

Annotated copy of map CPH 3i

Representation ID:

MCA/CPH3/R/4/1676

Organisation/ person making representation:

[REDACTED] (West Lancashire Borough Council)

Name of site:

Not specified

Report map reference:

CPH 3i

Route sections on or adjacent to the land:

Not specified

Other reports within stretch to which this representation also relates

CPH 4

Summary of representation: The representation supports the installation of a new bridge over the River Douglas, potentially in the vicinity of Tarleton Lock. It raises concerns over the perceived solution current (the A59 road bridge) on grounds of safety. It also suggests that consideration be given to modification of the disused pipe bridge, so as to provide a pedestrian crossing.

Natural England's comment: We agree that a new bridge over the River Douglas is the only satisfactory solution to the discontinuity of the route, as proposed, and should be regarded as a high priority by all stakeholders. We will continue to engage with such stakeholders with the aim of creating a partnership approach to the delivery of a new bridge. We agree with the assessment of risk around any promoted use of the A59 road bridge for public access – and hence this did not form part of our proposals for the England Coast Path.

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

Relevant appended documents (see Section 5):

WLBC has supplied NE directly with a copy of the Feasibility Study for the proposed River Douglas Linear Park (Gillespies, April 2010).

Representation ID:

MCA/CPH3/R/7/1579

Organisation/ person making representation:

[REDACTED]

Name of site:

River Douglas

Report map reference:

Not specified

Route sections on or adjacent to the land:

Not specified

Other reports within stretch to which this representation also relates

CPH 4

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

Natural England's comment: We agree that a new bridge over the River Douglas is the only satisfactory solution to the discontinuity of the route, as proposed, and should be regarded as a high priority by all stakeholders. We will continue to engage with such stakeholders with the aim of creating a partnership approach to the delivery of a new bridge. We agree with the assessment of risk around any promoted use of the A59 road bridge for public access – and hence this did not form part of our proposals for the England Coast Path.

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

Relevant appended documents (see Section 5):

None supplied

Representation ID:

MCA/CPH3/R/9/0008

Organisation/ person making representation:

[REDACTED] (The Disabled Ramblers)

Name of site:

GC/2020/17

Various

Report map reference:

CPH 3a, CPH 3c, CPH 3e, CPH 3f, CPH 3g & CPH 3h

Route sections on or adjacent to the land:

CPH-3-S003, CPH-3-S006, CPH-3-S009, CPH-3-S012 and various others

Other reports within stretch to which this representation also relates

N/A

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

Various changes to specific suggested infrastructure items are requested.

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

Relevant appended documents (see Section 5):

The Disabled Ramblers Document: Man-made Barriers and Least Restrictive Access

Representation ID:

MCA/CPH3/R/10/0013

Organisation/ person making representation:

[REDACTED] (National Grid)

Name of site:

Not specified

Report map reference:

CPH 3c, CPH 3e

Route sections on or adjacent to the land:

Not specified

Other reports within stretch to which this representation also relates

CPH 2

Summary of representation: The representation notes that the proposed route is close to various National Grid assets and asks that further information be supplied to National Grid's risk management team.

Natural England's comment: Given that establishment of the England Coast Path is minimal and very localised, we would not anticipate any risk arising from proximity to National Grid infrastructure. We would expect Lancashire County Council, who will be responsible for any ECP establishment works, to follow all relevant legislation and best practice. Further communications with affected landowners will precede the works.

Relevant appended documents (see Section 5):

'NG Assets – coastal path' map

5. Supporting documents

These, as listed above, are supplied separately due to the quantity and size of the documents.

MCA/CPH1/R/3/1160 and MCA/CPH1/R/2/1026. Other material redacted due to containing personal information





Appendix C



Appendix C



MCA/CPH1/R/1/1563

FORM FOR MAKING REPRESENTATIONS ABOUT A COASTAL ACCESS REPORT

Any person may make a representation about a coastal access report.

This form should be completed if you wish to make a representation about the coastal access report which Natural England submitted to the Secretary of State for Environment, Food and Rural Affairs on 7 October 2020 under section 51 of the National Parks and Access to the Countryside Act 1949, pursuant to its duty under section 296(1) of the Marine and Coastal Access Act 2009. The report relates to **Cleveleys to Pier Head, Liverpool**.

Any representations about the reports must be made on this form and received by Natural England no later than **midnight on 2 December 2020**. If you require more space for your comments, please continue on a separate sheet.

1. Please give the number of the report and number of the map to which the representation(s) relate(s):

Report CPH1

Map CPH1o

Map CPH1p to CPH1r inclusive

2. If the representation(s) relate to specific land on the map(s), please describe the land here:

WARTON AIRFIELD

Route sections CPH-1-so88 – CPH-1-s110 inclusive

3. Please tick the appropriate box below to show who is making the representation(s), or on whose behalf you are making the representation(s):

An access authority for an area in which land to which the report relates is situated

A local access forum for an area in which land to which the report relates is situated

The Historic Buildings and Monuments Commission for England (English Heritage)

The Environment Agency

A person specified in Schedule 1 to the Coastal Access Reports (Consideration and Modification Procedure) (England) Regulations 2010 (S.I. 2010/1976)

Other (please give details): Landowner and Global Defence Contractor
BAE SYSTEMS (Operations) Limited
Warton Aerodrome

4. If you have ticked the "other" box above, please also indicate if you are a person with a relevant interest (within the meaning of section 55J(2) of the National Parks and Access to the Countryside Act 1949^(a)) in land to which the report relates

5. Please give details of, and the reasons for, the representation(s) you are making about Natural England's report:

Warton Aerodrome owned by BAE SYSTEMS (Operations) Limited is safeguarded by the MOD in conjunction with BAE SYSTEMS. Safeguarding of the Airfield is regulated by Statute as well as related security requirements. The need to maintain minimum buffer widths between the security fence and any

future developments in respect of the proposed route is of concern to both safeguarding and security and therefore requires further consultation and discussions prior to any detailed design work being adopted, if as suggested the proposed route is to deviate from the existing public right of way.

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

Letter dated 16th November 2020 on behalf of BAE SYSTEMS (Operations) Limited signed by [redacted]
[redacted] FM Engineering and Governance Manager.

7. Have you made any other representations about the report?

Yes

No

8. If you are a person with a relevant interest in land to which the report relates, have you made any objection(s) which relate(s) to that land?

Yes

No

9. Please complete your details below:

| | |
|--|---|
| Name: | D.D.C.Darling FRICS. FAAV. Agent for and on behalf of BAE SYSTEMS (Operations) Limited. |
| Organisation/company (if appropriate): | Cassels Darling |
| Address (including post code): | Estate Office Hill Farm, Knapp, Taunton, Somerset. TA3 6BE |
| Telephone: | 01823 491055 |
| E-mail: | Cassels.darling@gmail.com |
| Date: | 20.11.20 |

10. The completed form should be sent to Natural England at:
Murley Moss Business Village, Oxenholme Road, Kendal, Cumbria, LA9 7RL
or to CPH.CoastalAccess@naturalengland.org.uk

(a) Section 55J(2) provides that a person has a relevant interest in land if the person is the owner of the land, holds a term of years absolute in the land, or is in lawful occupation of the land.

BAE SYSTEMS
Air
Warton Aerodrome, Warton
Preston, Lancashire
PR4 1AX United Kingdom

BAE SYSTEMS

16 November 2020

Dear Sir/Madam

RE: Notification of publication of Coastal Access report - Cleveleys to Pier Head, Liverpool

BAE Systems would like to comment on the Notice of Natural England's Coastal Access Report dated 7 October 2020.

The Company is in agreement with the route of the coastal path east of Warton Airfield, particularly the corresponding document Sections 1.2.7 and 1.2.17 of the report. This satisfies our significant safety concerns of increasing bird activity around our flight path.

We note that the route of the new path largely follows that of the existing public right of way to the south-west and south of Warton Airfield but is shown to deviate in places. These deviations appear to move the new coastal path towards the BAE Systems security fence which is a cause for concern.

We would request that the route follow the existing public right of way. If, for whatever reason, the route proposed does move towards our security fence, we would ask to be included in any discussions before detailed design work is committed to. Due to BAE Systems role as a Global Defence Contractor and key supplier to the Ministry of Defence it is essential that we maintain at least a 2 metre buffer between our security fence and any development to ensure we maintain very exacting Industrial Security standards.

We look forward to working with Natural England to implement the coastal path for the benefit of both parties.

Yours faithfully
for and on behalf of
BAE SYSTEMS (Operations) Ltd

[redacted]

FM Engineering & Governance Manager

MCA/CPH1/R/9/1654

Lancashire Local Access Forum

Minutes of the Meeting held on Tuesday, 24th November, 2020 at 10.00 am in Zoom Virtual Meeting - Zoom

Present:

Chair

[Redacted], Independent

Committee Members

[Redacted] Ramblers Association

[Redacted] Chris Kynch, Lancashire Association of Local Councils
County Councillor [Redacted]

[Redacted], Wyre Borough Council

[Redacted], Lancaster Ramblers Association

Officers

[Redacted], Public Rights of Way LCC

1. Apologies for Absence

Apologies were received from [Redacted]

2. Introduction

The Chair welcomed everyone to the meeting. The Chair pointed out that the LLAF first made representations in March 2020 on the northern part of the coastal path from the Cumbrian Border down to Cleveleys. The LLAF had concentrated on the bigger issue of the Pilling embankment. The reason for this was that the forum hoped to enhance the speed at which the process was carrying on. The forum wanted the footpath put in quickly.

It was pointed out that during Covid there was a flurry of illegal signs put up to stop people using rights of way. The LLAF had asked the Public Rights of Way Team to take urgent action on this which they had done.

It was noted that the Regional Access Forum had still continued which the Chairs of the Local Access Forums attended. It was important for these meetings to continue.

The Chair pointed out that the last Regional Access Forum Zoom meeting was cancelled as there was no funding for it.

3. Notification of publication of Coastal Access Reports - Cleveleys to Pier Head, Liverpool

The Chair wished to thank all the staff and Natural England and all the local authorities involved with the coastal path.

[Redacted], LCC Public Rights of Way Officer, stated that it was Lancashire County Council's responsibility to implement the line of the trail once it had been agreed by the Secretary of State.

One issue with the path was at the River Douglas. The biggest concern here was that the path stopped as there was a lack of a crossing. The forum was informed that LCC would not be making any representations on this section as it felt there were no areas it could make a difference to on the proposals. It was pointed out that Hesketh with Becconsall Parish Council was looking to do some of its own work which was considering the option of using the redundant pipe bridge to become a pedestrian bridge. LCC was looking at where the path could cross the River Douglas and where the correct place would be. It would be costly as the river was tidal and very large. The Ramblers Association stated that it was regrettable there was not a crossing over the River Douglas and that funding should be provided for one. LCC had ruled out where it could not put a bridge due to various circumstances but had not ruled in where it could. It was also noted that there was no financial support to put a bridge in due to the cost.

Regarding maps CPH 3e and 3f, another place of controversy was around Hutton Marsh and the embankments near the Dolphin Pub. It was thought that a route along either embankment would provide better views. There were exclusions to existing public rights of way here due to the protection of nesting birds. Where the path had been ruled out was due the Lancashire County Council and Natural England being aware of existing nesting birds and would be managed as a bird nesting site. It was pointed out that nature conservation had to be balanced with access rights. It was stated that LCC was not making any representations on this area. LCC was not the landowner. The legislation looked at access and whether it was appropriate access and took into account nature conservation concerns.

The forum was informed that the whole of the English Coastal Path allowed access for pedestrians and their dogs. There were some sections where the dogs must be on leads and some sections here they did not. The only reason where access would be denied would be for nature conservation. The Ramblers Association's response would be to the different standards of rules around the country. The Association felt there was no uniformity in decision making across the country.

Regarding Map CPH 3g and the section of the path near the old Longton tip which was now grassed over, the Ramblers Association felt the path could go further to the west than what was being proposed. They felt the path should continue running south along the side of Little Hoole Marsh. It was noted that existing rights of way were being used on this section.

On Map CPH 2a, Brades Lane, Freckleton to Toll House Bridge, there were concerns over where the path ran alongside the dual carriageway. This was due to a combination of nesting birds and access. Nature conservation was the reason the path ran alongside the dual carriageway. There had been discussions with the landowners around here and several route options had been proposed and Natural England believed the path alongside the dual carriageway was the best option. It pointed out that one of the issues for Natural England was that these were statutory protected sites for birds. A majority of the area was a Site of Special Scientific Interest (SSSI). The Ramblers Association was in discussions internally regarding its response. The LLAF felt there needed to be a realistic alternative proposed that fitted in with all the criteria.

Regarding Map CPH 2e, Preston Go-Kart Track to Wallend Road, Riversway, Preston, it was noted that the path was on the north side of the race track going east. The Ramblers Association felt a short part of the path could go east and then south between the two tracks towards the river and the run along the river bank. The reason the path ran along the north side of the track was to do with land use. Even though it was open access land there was motocross taking place on it. There was concern for people's safety if they walked between the tracks. The Ramblers Association had agreed an alternative route to send to Natural England.

Regarding Map CPH 4a, Tarleton Lock to Douglas Avenue, Tarleton, there was concern over the path between Sutton Avenue and Ashland Gardens. Hesketh with Becconsall Parish Council was looking at preparing their own footpath which deviated slightly from the Natural England path. At high tide the proposed route from Natural England could be submerged. LCC stated that if the parish council had a better line for the path it should raise this with Natural England.

It was pointed out to the forum that objections to the path that would be sent to Planning Inspectorate could only come from landowners. Representations from LCC might not be picked up by the Planning Inspectorate.

The Chair, Richard Toon, would be doing a submission on behalf of the Lancashire Local Access Forum to Natural England.

4. Any Other Business

There was no Any Other Business.

5. Date of Next Meeting

To be confirmed.

[Redacted]
Director of Corporate Services

County Hall
Preston

MCA/CPH1/R/5/1536

FRECKLETON PARISH COUNCIL – ENGLAND COAST PATH REPRESENTATION

Representation regarding Coastal Access Report

Relating to the Proposed Cleveleys to Pier Head, Liverpool Coastal Path published
by Natural

England

Freckleton Parish Council

Relating to

Map Reference CPH 1

GC/2020/17

Between Route Sections S110FP and S143FP

Notes in Respect of the Representation

The section of the proposed Coast Path from Taylor's Pool at the outflow of the Pool Stream

(reference Natural England Coast Path Report S111FP) to Brades Lane Freckleton (reference

Natural England Coast Path Report S143FP) and beyond to the boundary of

Freckleton and Clifton Marshes all lies within the Parish of Freckleton.

The path has the potential to be a significant asset to the Parish of Freckleton but does require significant upgrade and investment to permit safe usage by able-bodied pedestrians. It is not suitable for any wheeled traffic, apart from the section along the A584. This is not proposed in the current plan.

The Parish Council does not consider the current footpath safe for users on foot because of the nature of the terrain over which it passes and the difficult ground underfoot over much of the length, especially on the Ribble shoreline.

Representation regarding Coastal Access Report

Issues Requiring Attention

The specific issues requiring attention on the length of path lying within the Parish of Freckleton are detailed below. A set of recent photographs are attached at the end of this report to illustrate the comments that follow.

Footpath Between Taylor's Pool and Naze Point, Sections S110FP to S113FP

This section of the path lies along the tidal riverbank, closely following the bank wall that protects the farms and dwellings from the actions of the River Ribble. The land to the seaward should not be accessible, as it forms the protected salt marsh and mudflats and is also used for grazing of stock by local farmers outside of nesting seasons. A previous attempt to add boardwalks to allow safe passage has resulted in dangerously isolated fragments, away from the designated path route, with difficult and dangerous gaps across saltmarsh and drains in between these sections.

The figure 1 shows the state of the path close to the end of Pool Lane, at the shore, following recent high tides which have reached the stone wall in the picture. The going underfoot is heavy and exhausting to walk on.

Figures 2 and 3 illustrate the overgrown nature of the path route where it should be, close to the floodplain retaining wall – a route clearly used by grazing stock to avoid the tides.

Figures 4 and 5 show long views of the overgrown vegetation on the bank further towards Naze Point, with the tidal high-water mark clearly displayed on the salt marsh.

Figure 6 shows the stile at the boundary between Naze Mount Farm and Naze Farm, where a wire fence divides the grazing areas on the marsh. This boundary needs to be maintained to permit the grazing. Close to this, there is a section of boardwalk that covers a surface water drain, resulting in a deep and boggy area around the drain. Figure 7 illustrates this feature. This is proposed for replacement by Natural England but should be closer to the bank.

The final pictures for this section, figures 8 to 10, show the final part of this section of path leading to Naze Point. There is another boardwalk, which sits isolated in a heavily poached area, making passage extremely difficult and dangerous.

The figures illustrate the issues and extent of the work required to allow safe access, in that the whole section along this part of the river really requires a firm footing, such as a boardwalk. Note however, that Spring Tides and storm surges will still inundate this whole section. These events also result in significant debris, including full trees with their roots, being deposited by the currents generated, from either the sea or from upriver. Even in late summer, people have sought refuge due to the difficult going, by climbing into private gardens of the residences along the riverbank.

There have been recent incidents requiring both Lifeboats and Coastguard activity to rescue people from the river, even during the dry spell early in the summer. It is of note that along this whole section, there are no refuges or suitable escape routes from the path, other than by trespass onto private property or farms

Footpath Between Naze Cottage and East View, Section S120FP

The path runs along the top of the bank through the fields overlooking Dow Brook and which actually run down to the water edge thereby allowing access for grazing stock, although the grazing is not currently in use for other reasons. The path surface is unmade and severely poached, making passage difficult and dangerous in winter or wet conditions, as shown in Figure 11.

Footpath Between Naze Villa and Poolside Farm, Sections S126FP and S127FP

The path has a very steep drop to the East side, is eroded in many places by surface water, is unmade with tree roots creating significant trip hazards along this stretch. Attention is required to the surface and edges with the addition of guard rails. Figure 12 illustrates the situation regarding the abrupt drop to the East and the surface erosion.

Footpath across Poolside Boat Yard - Section S131FP

The path lies across the boatyard, now in use for the manufacture of fairings for road vehicles. It is strewn with glass fibre filaments embedded into and standing loose on the surface across this section, representing a potential hazard to the public.

Footpath from Bunker Street to The Freckleton Marsh Gates – Sections S132FP to S135FP

Large parts of these sections are overgrown and heavily encroached upon by vegetation, with evidence of tipping of cut vegetation and fly-tipping of other waste. Figure 13 shows the current state of the path along this length. It becomes very narrow and treacherous underfoot before exiting onto the road close to the Marsh Gates. **Path Section along the A584 to Clifton Marsh**

Whilst not strictly on this section of footpath for consideration, the main road does feature a wide path to the south side of the dual carriageway. This is currently overgrown with the surface made hazardous by tree roots. However, it offers a potential for a well-made route which could double as a joint cycle/pedestrian track, although there is provision for cycles on the dual carriageway which currently is not marked solely for cyclists' use, on both carriageways.

Prepared by

[Redacted]

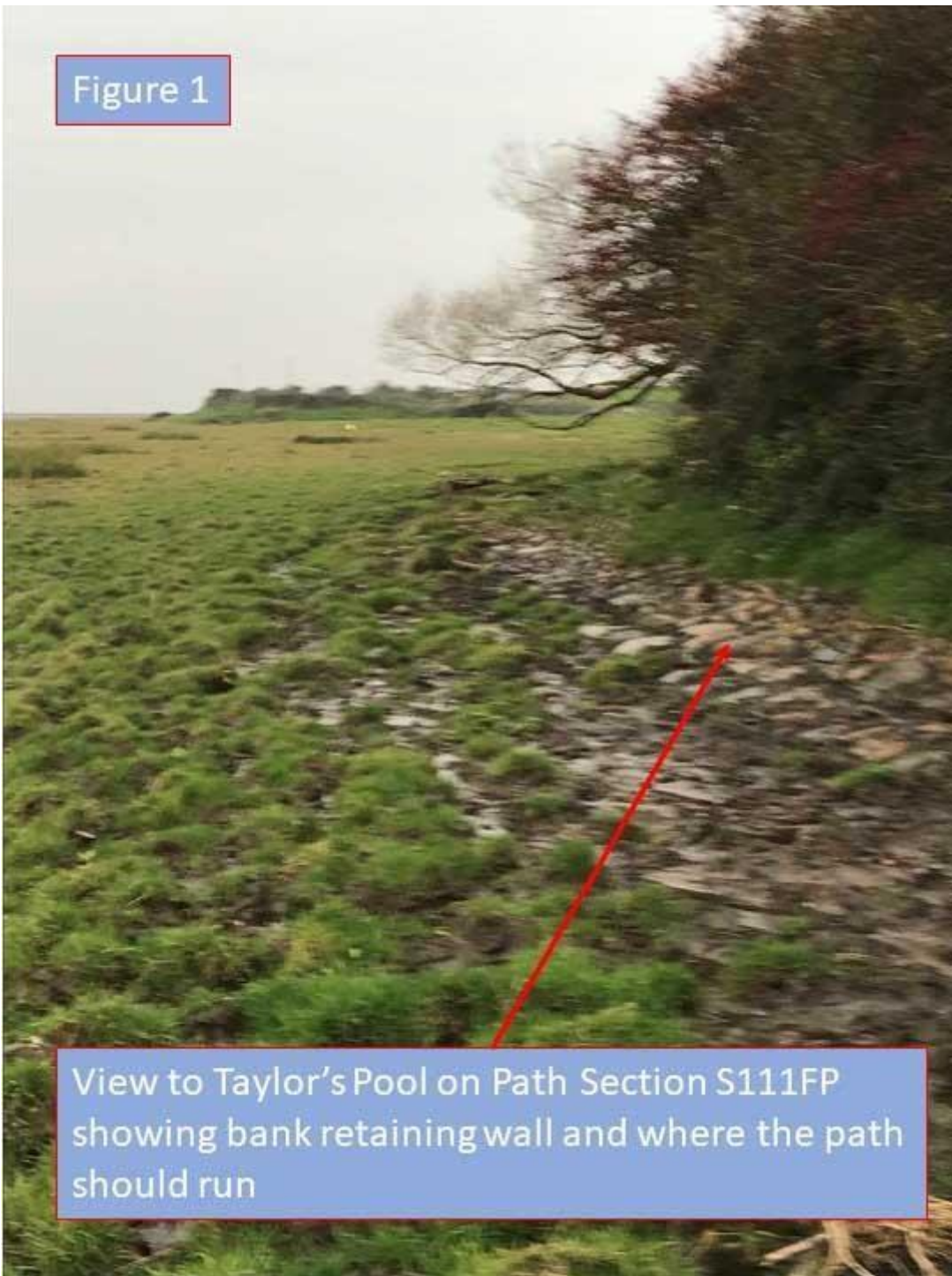
[Redacted] , BSc., C.Eng., FRAeS

Date 13/11/2020

For and on behalf of

Freckleton Parish Council

Figure 1



View to Taylor's Pool on Path Section S111FP showing bank retaining wall and where the path should run

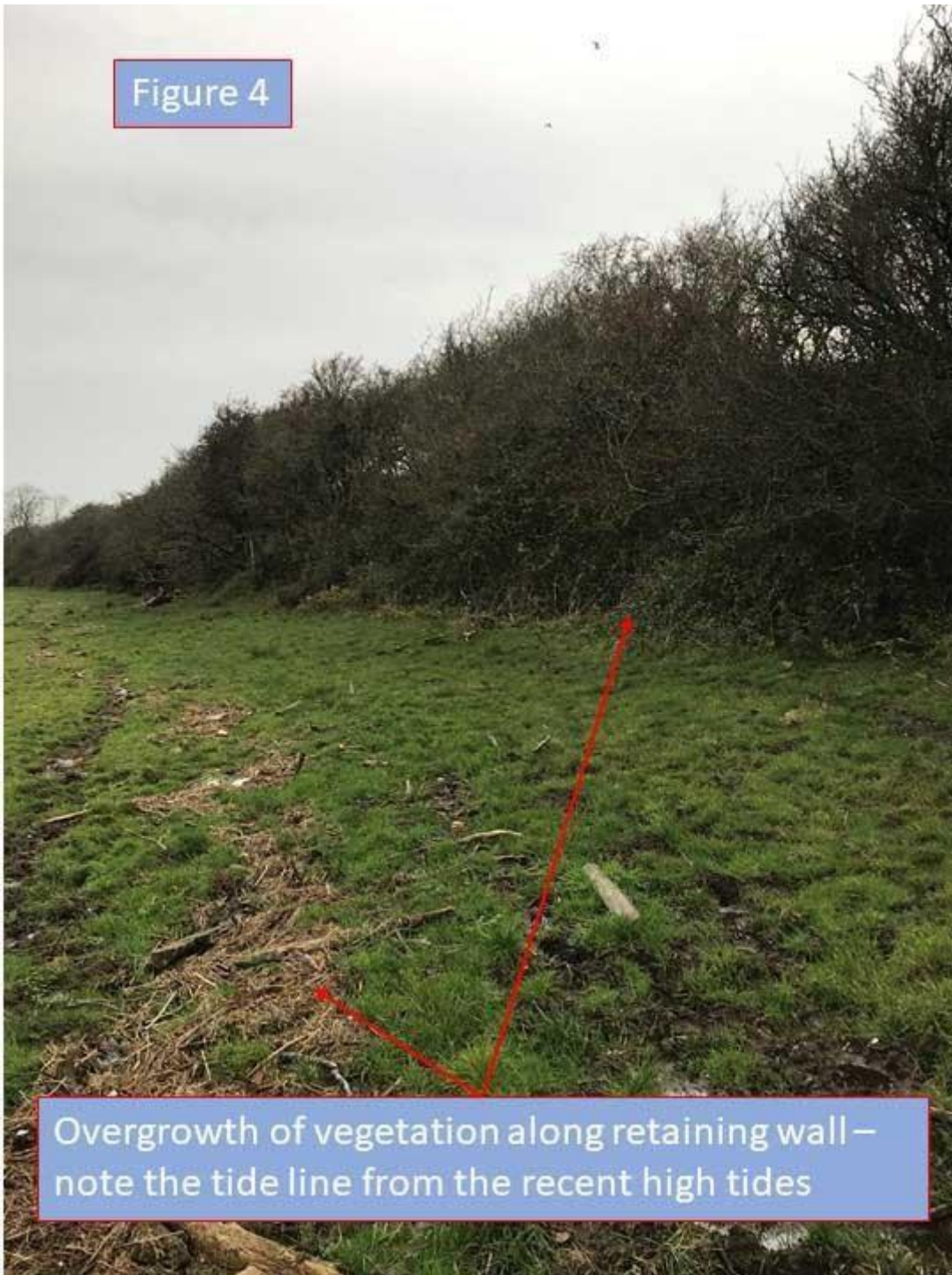


Figure 2

Overgrowth of vegetation along retaining wall where the path should be



Figure 4



Overgrowth of vegetation along retaining wall – note the tide line from the recent high tides

Figure 5



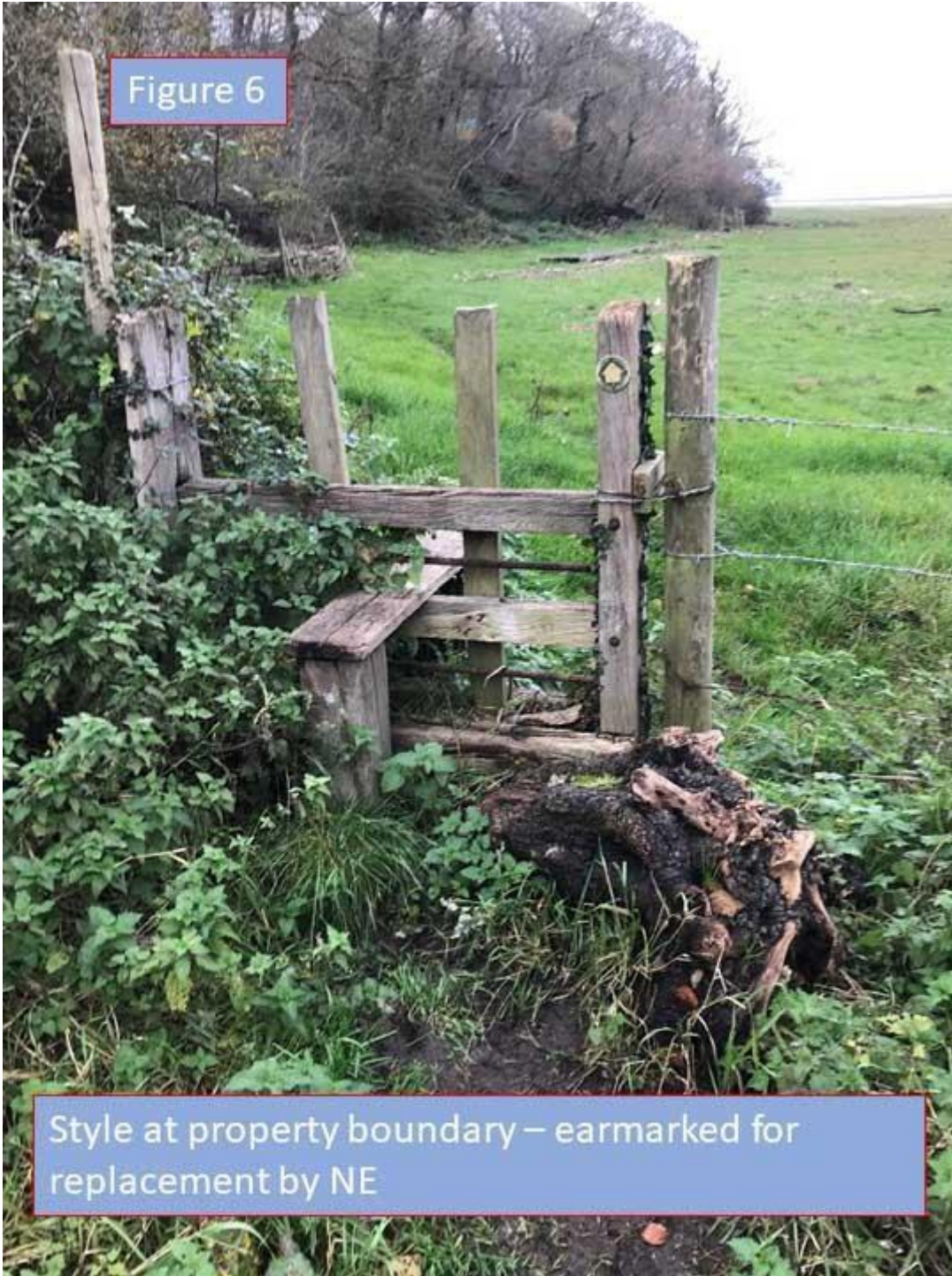


Figure 6

Style at property boundary – earmarked for replacement by NE

Figure 7



Section of boardwalk – isolated in mid marsh over a drain area away from retaining wall – proposed for removal by NE and not replaced

Figure 8



Western approach to boardwalk at Naze Farm – proposed for replacement, but note the state of the poached area from grazing

Figure 9



Section of boardwalk at Naze Farm – proposed for replacement

Figure 10



Eastern end of boardwalk
below Naze Farm up to Naze
Point – path lies against fence,
but area heavily poached from
grazing with difficult footing



Figure 12



Figure 13

Footpath



Footpath beside Dow Brook adjacent to garden fences showing cut & dumped vegetation and waste material

MCA/CPH1/R/4/0725

Attachment 1

Representation regarding the Coastal Access Report

Relating to the Proposed Cleveleys to Pier Head, Liverpool Coastal Path published
by National England

Being Compiled by Whittaker & Co as Duly Authorised Agents for and on
Behalf of

[Redacted]

of

[redacted]

Relating To

Map Reference CPHI

Between Route Sections SN113FP to S122FP and SP S122FP to SP123FP

Whittaker & Co
Chartered Surveyors & Valuers
The Estate Office
Fiddler Hall
Newby Bridge
Ulverston
Cumbria
LA12 8NQ
Telephone: 015395 30000

1. Notes in Respect of the Representation

- (a) In making the representation [redacted] is seeking a fair balance between the interests as an owner of land at Naze Farm and those of the public.
- (b) [redacted] has lived at Naze Farm for over 70 years and worked on the farm for over 50 years and so has intimate knowledge of the footpath from walking it to school and the whole of his working life.
- (c) Consideration of animal welfare and animal health and safety issues need to be fully addressed. [redacted] has found that the existing step stiles and kissing gates have been effective in that the public have easy access, but stock cannot damage or gain access down the public footpath.
- (d) Where spring loaded pedestrian gates have previously been installed along sections of the footpath these have very quickly been vandalised by members of the public thus resulting in stock escaping down the public footpath.
- (e) It is important that stock do not escape down the public footpath as they can very easily become stuck/trapped down the public footpath.
- (f) It is certainly a potential health and safety issue to the public using the public footpath if stock are trapped/have escaped down the footpath.
- (g) [redacted] has found that pedestrian gates are not suitable. [redacted]'s comments re self-closing gates come from personal experience of this particular path. The pathway is very narrow in three areas where self-closing gates are proposed. If these become dysfunctional then cattle gain access and have in the past entered in procession with no escape which has resulted in damage to the adjacent fences and also some injury to livestock, in one case very serious.
- (h) Due to the aforementioned points and for the sake of consistency is seeking for either the existing step stiles to remain or for kissing gates to be installed.

2. Comments in Relation to the Proposed Infrastructure (a) Route Section SN113FP

NE Proposed Infrastructure: boardwalk/pedestrian gate, drainage.

Owner's Requested Infrastructure: additional boardwalk along the very wet sections of the salt marsh

Comments

This section of salt marsh estuary does not provide a safe walking surface during the autumn/winter period, and is subject to frequent tidal sea water induction

Firstly, water seeps out of the banking on the landward side and the saltmarsh appears to rise slightly thus resulting in a wet and soggy area at the foot of the banking along the proposed footpath which is further exacerbated from high tides.

Virtually impossible without wellies.

The present proposals along this section are unsuitable for public access. (See photos Appendices A to F).

(b) Route Section S114FP

Existing Infrastructure: Broken/abandoned kissing gate midway up the slope. Previous fencing installed to keep the stock off the existing footpath.

NE Proposed Infrastructure: Pedestrian gate and steps.

Owner's Requested Infrastructure: South and north of the concrete trackway and cattle grid — Step stile
Pedestrian gate

(See photos Appendix G)

(c) Route Section
S115FP Existing
Infrastructure:

NE Proposed Infrastructure:

Owner's Requested
Infrastructure: (See photos
Appendices H & I).

(d) Route Section
Si17FP Existing
Infrastructure:

NE Proposed Infrastructure:

Owner's Requested
Infrastructure:

(See photos Appendices J,
K & L).

Accepts the steps
Requests a Kissing gate at
the bottom and top of the
slope. And for the existing
stock netting fencing along
the easterly side of the
footpath to be removed.

Step stile
Pedestrian gate
Either step stile or kissing
gate

Either step stile or kissing gate

(e) Route Section S118FP — Eastern End

Existing Infrastructure: Step stile
NE Proposed Infrastructure: Pedestrian gate
Owner's Requested Infrastructure: Either step stile or kissing gate
(See photos Appendix M).

(f) Route Section S119FP — Northern End

Existing Infrastructure: Sleeper bridge with step stile at each end
NE Proposed Infrastructure: Sleeper bridge
Owner's Suggested Infrastructure: Remove the existing sleeper bridge, install a pipe in the dyke, infill over with stone and then install one kissing gate in line with the hedge boundary between the 2 fields
(See photos Appendices N & O).

(g) Route Section S121FP — North End

Existing Infrastructure: Self closing gate
NE Proposed Infrastructure: Pedestrian gate
Owner's Requested Infrastructure: Kissing gate
The existing self closing gate mechanism has become defunct so for the sake of consistency the owner is requesting a kissing gate. (See photo Appendices P & Q)
NE Proposed Infrastructure: Flag stones
Steps
Acceptable

(h) Route Section S122FP

Existing Infrastructure:
NE Proposed Infrastructure:
Owner's Requested Infrastructure: (See photo Appendix R). Kissing gate and boundary fence which has become dilapidated
Remove the pedestrian gate

(i) Route Section S123FP

Existing Infrastructure:
Owner's Requested Infrastructure: Kissing gate with section fenced (See photo Appendix S)

The owner owns land down to the east side down to the shore so although there is presently a fence on the west side of the pathway the owner has previously grazed stock on the banking east of the footpath down to the shore.

So for the sake of consistency is seeking a kissing gate at the northerly end of the track bordering onto the trackway leading to Cottage.

3. Conclusion

(a) [redacted] accepts that it is the preference of National England to improve public access where possible to remove the existing step stiles along the pathway and have proposed to install these features with pedestrian gates. However, in light of the aforementioned points in particular

Section 1 — Notes in Respect of the Representation, [redacted] has found that pedestrian gates are not suitable along this pathway with his stock so for the sake of consistency is seeking for either the existing step stiles to remain or for kissing gates to be installed. [redacted] has also proposed a number of other amendments along the route as aforementioned.

(b) It is requested that [redacted]'s wishes/requests as proposed in this Report will be accepted as a reasonable request/representation by [redacted] to Natural England and be adopted as such by the Secretary of State as part of the order by Natural England under Section SI and The National Parks and Access to the Countryside Act 1949.

Signed CAK Co
Whittaker & Co

Dated 16th November 2020

(As duly Authorise gents for and on behalf of [redacted])

Appendix A



Appendix B



D
C
2
J
:

Appendix C



Appendix D



13-05-2014

Appendix E



Appendix G



Appendix H



Appendix I



Appendix J



Appendix K



Appendix L



Appendix M



Appendix N



10/10/2018

Appendix Q



APPENDIX Q

[Redacted due to containing personal information]

MCA/CPH1/R/8/0008



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

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

Gaps

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

Bollards

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

Pedestrian gates

A two-way, self-closing gate closing gate with trombone handle and Centrewire EASY LATCH is the easiest to use – if well maintained, and if a simple gap is unacceptable. Yellow handles and EASY LATCH allow greater visibility and assist those with impaired sight too:

<https://centrewire.com/products/easy-latch-for2-way-gate/> One-way opening gates need more manoeuvring space than two-way and some mobility vehicles may need a three metre diameter space to manoeuvre around a one-way gate. The minimum clear width of pedestrian gates should be 1.1metres (BS 5709:2018).

Field gates

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

Bristol gates

(Step-over metal gate within a larger gate: <https://centrewire.com/?s=bristol>.) These are a barrier to mobility vehicles as well as to pushchairs and so should be replaced with an appropriate structure. If space is limited, and a pedestrian gate not possible, a York 2 in 1 Gate:

<https://centrewire.com/products/york-2in-1/> could be an alternative, with a self-closing, two-way opening, yellow handle and EASY LATCH for the public access part of the gate.

Kissing gates

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

Note about RADAR locks on Kissing gates

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

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

Board walks, Footbridges, Quad bike bridges

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

Sleeper bridges

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

Steps

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

Cycle chicanes and staggered barriers

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

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

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

If no alternative is possible, the gap in the barrier should be adjusted to allow riders of large mobility vehicles to pass through. Mobility vehicles can legally be up to 85 cm wide so the gap should be at least this; and the same width should be allowed all the way up from the ground to enable room for handle bars, arm rests and other bodywork. The ground beneath should be level otherwise a greater width is needed. K barriers are often less intimidating and allow for various options to be chosen, such as a shallow squeeze plate which is positioned higher off the ground: <http://www.kbarriers.co.uk/>

Stepping stones

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

Stiles

Stiles are a barrier to mobility vehicles, walkers who are less agile, and families with pushchairs. They should be replaced with a suitable alternative structure. If there are good reasons to retain the stile, such as it being listed by Historic England, then an alternative to the stile, such as a pedestrian gate, should be provided nearby in addition to the stile.

Urban areas and Kerbs

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

| FORM FOR MAKING OBJECTIONS ABOUT A COASTAL ACCESS REPORT | | | | | | | | | | | | | | | |
|--|--|---|--|--|-------------------------------------|--|--------------------------|--|--------------------------|---|-------------------------------------|---|--------------------------|--|--------------------------|
| <p>Only owners, tenants and occupiers of affected land may make an objection about a coastal access report.</p> <p>This form should be completed if you wish to make objections about the coastal access report which Natural England submitted to the Secretary of State for Environment, Food and Rural Affairs on 7 October 2020 under section 51 of the National Parks and Access to the Countryside Act 1949, pursuant to its duty under section 296(1) of the Marine and Coastal Access Act 2009. The report relates to Cleveleys to Pier Head, Liverpool.</p> <p>Any objections about the report must be made on this form and received by Natural England no later than midnight on 2 December 2020. If you require more space for your comments, please continue on a separate sheet.</p> | | | | | | | | | | | | | | | |
| <p>1. Please give the number of the report and number of the map to which the objection(s) relate(s):</p> <p>CPH2 Brades Lane, Freckleton to Penwortham New Bridge, Preston Maps CPH2a CPH2d CPH2e CPH2f</p> | | | | | | | | | | | | | | | |
| <p>2. If the objection(s) relates to specific land on the map(s), please describe the land here:</p> <p>CPH2a Newton and Clifton Marshes. Pink shaded land part tenanted and subject to an agricultural tenancy of Grange Farm, Freckleton, indicated on our plan no 4NTS by red hatching north of the River Ribble</p> <p>CPH2a Newton and Clifton Marshes. Pink shaded land part tenanted and subject to a lease of 15.91 acres of land for a solar farm</p> <p>CPH2d & CPH2e We draw attention to a lease of land at Wallend Road dated 5.8.2020 between Preston City Council and [redacted] shown edged red on our plan 2NTS. The land is used by our lessee as an off road motorcycle experience (Trax Motorsport)</p> <p>CPH2f We draw attention to the Council's vacant development land holding edged red on our plan 3NTS at Lockside Road.</p> | | | | | | | | | | | | | | | |
| <p>3. Please tick the box below which indicates your interest in the land to which the objection(s) relate(s) and give a brief description of your relevant interest:</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 30%;">Owner</td> <td><input checked="" type="checkbox"/> Freeholder of the above sites subject to leases where stated</td> </tr> <tr> <td>Tenant</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Occupier</td> <td><input type="checkbox"/></td> </tr> </table> | | Owner | <input checked="" type="checkbox"/> Freeholder of the above sites subject to leases where stated | Tenant | <input type="checkbox"/> | Occupier | <input type="checkbox"/> | | | | | | | | |
| Owner | <input checked="" type="checkbox"/> Freeholder of the above sites subject to leases where stated | | | | | | | | | | | | | | |
| Tenant | <input type="checkbox"/> | | | | | | | | | | | | | | |
| Occupier | <input type="checkbox"/> | | | | | | | | | | | | | | |
| <p>4. You may only make objection(s) on one or more of the grounds below (as set out in paragraph 3(3) of Schedule 1A to the National Parks and Access to the Countryside Act 1949). Please tick the appropriate box(es) to indicate the relevant grounds:</p> <table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 80%;">The proposals in the report fail to strike a fair balance^(a) in such respects as are specified in the objection(s) as a result of one or more of the following:</th> <th style="width: 20%;">Tick box</th> </tr> </thead> <tbody> <tr> <td>(a) the position of any part of the proposed route (paragraph 3(3)(a))</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>(b) the inclusion of proposals (in relation to an area subject to significant coastal erosion, encroachment by the sea or significant physical change due to other geomorphological processes) providing for the route to be determined in accordance with provision made in the proposals (rather than as shown on a map), or the nature of any such proposal (paragraph 3(3)(b))</td> <td><input type="checkbox"/></td> </tr> <tr> <td>(c) the inclusion of, or failure to include, proposals for an alternative route, or the position of such a route or any part of it (paragraph 3(3)(c))</td> <td><input type="checkbox"/></td> </tr> <tr> <td>(d) the inclusion of, or failure to include, proposals that certain boundaries of certain areas should coincide with a specified physical feature, or the nature of any such proposal (paragraph 3(3)(d))</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>(e) the inclusion of, or failure to include, proposals as to the directions to be made under Chapter 2 of Part 1 of the Countryside and Rights of Way Act 2000 for the exclusion or restriction of a right of access in relation to land to which the report relates, or the terms of any such proposal (paragraph 3(3)(e))</td> <td><input type="checkbox"/></td> </tr> <tr> <td>(f) the exercise of a discretion conferred on Natural England by section 301(2) or (3) of the Marine and Coastal Access Act 2009, or the failure to exercise a discretion conferred by section 301(3) of that Act (discretions which relate to a case where the continuity of any part of the coast is interrupted by a river) (paragraph 3(3)(f))</td> <td><input type="checkbox"/></td> </tr> </tbody> </table> | | The proposals in the report fail to strike a fair balance ^(a) in such respects as are specified in the objection(s) as a result of one or more of the following: | Tick box | (a) the position of any part of the proposed route (paragraph 3(3)(a)) | <input checked="" type="checkbox"/> | (b) the inclusion of proposals (in relation to an area subject to significant coastal erosion, encroachment by the sea or significant physical change due to other geomorphological processes) providing for the route to be determined in accordance with provision made in the proposals (rather than as shown on a map), or the nature of any such proposal (paragraph 3(3)(b)) | <input type="checkbox"/> | (c) the inclusion of, or failure to include, proposals for an alternative route, or the position of such a route or any part of it (paragraph 3(3)(c)) | <input type="checkbox"/> | (d) the inclusion of, or failure to include, proposals that certain boundaries of certain areas should coincide with a specified physical feature, or the nature of any such proposal (paragraph 3(3)(d)) | <input checked="" type="checkbox"/> | (e) the inclusion of, or failure to include, proposals as to the directions to be made under Chapter 2 of Part 1 of the Countryside and Rights of Way Act 2000 for the exclusion or restriction of a right of access in relation to land to which the report relates, or the terms of any such proposal (paragraph 3(3)(e)) | <input type="checkbox"/> | (f) the exercise of a discretion conferred on Natural England by section 301(2) or (3) of the Marine and Coastal Access Act 2009, or the failure to exercise a discretion conferred by section 301(3) of that Act (discretions which relate to a case where the continuity of any part of the coast is interrupted by a river) (paragraph 3(3)(f)) | <input type="checkbox"/> |
| The proposals in the report fail to strike a fair balance ^(a) in such respects as are specified in the objection(s) as a result of one or more of the following: | Tick box | | | | | | | | | | | | | | |
| (a) the position of any part of the proposed route (paragraph 3(3)(a)) | <input checked="" type="checkbox"/> | | | | | | | | | | | | | | |
| (b) the inclusion of proposals (in relation to an area subject to significant coastal erosion, encroachment by the sea or significant physical change due to other geomorphological processes) providing for the route to be determined in accordance with provision made in the proposals (rather than as shown on a map), or the nature of any such proposal (paragraph 3(3)(b)) | <input type="checkbox"/> | | | | | | | | | | | | | | |
| (c) the inclusion of, or failure to include, proposals for an alternative route, or the position of such a route or any part of it (paragraph 3(3)(c)) | <input type="checkbox"/> | | | | | | | | | | | | | | |
| (d) the inclusion of, or failure to include, proposals that certain boundaries of certain areas should coincide with a specified physical feature, or the nature of any such proposal (paragraph 3(3)(d)) | <input checked="" type="checkbox"/> | | | | | | | | | | | | | | |
| (e) the inclusion of, or failure to include, proposals as to the directions to be made under Chapter 2 of Part 1 of the Countryside and Rights of Way Act 2000 for the exclusion or restriction of a right of access in relation to land to which the report relates, or the terms of any such proposal (paragraph 3(3)(e)) | <input type="checkbox"/> | | | | | | | | | | | | | | |
| (f) the exercise of a discretion conferred on Natural England by section 301(2) or (3) of the Marine and Coastal Access Act 2009, or the failure to exercise a discretion conferred by section 301(3) of that Act (discretions which relate to a case where the continuity of any part of the coast is interrupted by a river) (paragraph 3(3)(f)) | <input type="checkbox"/> | | | | | | | | | | | | | | |

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|--|
| <p>5. Please give details of the objection(s) you are making, and explain why you think that the proposals in the report fail to strike a fair balance as a result of the matter or matters that you have selected above:</p> <p>1) Grange Farm Freckleton: Plan CPH2a shows pink shading indicating land proposed to be subject to long term access exclusion. Our concerns are that our agricultural tenant's land holding in this area will be adversely affected and we need comfort that the tenant, who has a legal interest in the land, is consulted by Natural England to ensure he is given the opportunity to comment on the proposals.</p> <p>2) Land adjacent to and East of Grange Farm Freckleton: Plan CPH2a shows pink shading indicating land proposed to be subject to long term access exclusion. Our concerns are that our tenant's land holding (solar farm) in this area will be adversely affected and we need comfort that the tenant, United Utilities Renewable Energy Limited, who has a legal interest in the land, is consulted by Natural England to ensure he is given the opportunity to comment on the proposals.</p> <p>3) Land at Wallend Road, Preston (Trax Motorsport facility): Plan CPH2d & CPH2e indicates the route nearest the coast affects a leased area (freeholder Preston City Council, lessee Mr Edward Sloane). Our concerns are that the proposals may affect the ability for our tenant to secure his land, and thus interfere with the tenant's business operations. We consider the tenant should be consulted by Natural England as a matter of priority.</p> <p>4) Land at Lockside Road, Preston. Plan CPH2f indicates the route takes part of the Council's development site thus reducing its future potential for development. Due to operational access requirements, part of this site is already reserved for maintenance of the dock basin, leaving a developable balance. If the proposals eat into the site, the Council is left with potentially no developable balance.</p> |
| <p>6. You may propose modifications of the proposals in the report, if you think that the modifications would remedy, or mitigate the effects of, the failure to strike a fair balance to which your objection(s) relate(s), and that the proposals as so modified would satisfy the requirements of paragraph 3(6) of Schedule 1A to the National Parks and Access to the Countryside Act 1949^(b). Do you wish to propose any modifications?</p> <p>Yes <input type="checkbox"/> In respect of the leased land, not at this stage as we would wish the tenants to be consulted directly.</p> <p>No <input type="checkbox"/> However we suggest in respect of Lockside Road, that the route is located on the adopted footway</p> |
| <p>7. If yes, please give details of the modifications, and state why you think that they would remedy, or mitigate the effects of, the failure to strike a fair balance to which your objection(s) relate(s), and why the proposals as so modified would satisfy the requirements of paragraph 3(6) of Schedule 1A to the National Parks and Access to the Countryside Act 1949:</p> <p>We believe that if the route follows the highway at Lockside Road, this does not detract from the scheme for such a short length of the route. This same approach has been used seemingly at Wallend Road where the route follows the highway</p> |
| <p>8. Please list below any documents or evidence you have included in support of the objection(s):</p> <p>a) Lease to Edward Sloan of the Trax Motorsport Facility b) Agricultural Tenancy of land at Grange Farm, Freckleton. c) Surrender of part of the above agricultural tenancy at Grange Farm, Freckleton. d) Lease of land for solar farm to United Utilities Renewable Energy Limited</p> |
| <p>9. Have you made any other objection(s) about the report?</p> <p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p> |
| <p>10. Have you made any representations about the report?</p> <p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p> |

| | |
|--|---|
| 11. Please complete your details below: | |
| Name: | [redacted] |
| Organisation/company (if appropriate): | Preston City Council |
| Address (including post code): | Property Services, Town Hall, Lancaster Road, Preston PR1 2RH |
| Telephone: | [redacted] |
| E-mail: | [redacted] |
| Date: | 2 nd December 2020 |
| 12. The completed form should be sent to Natural England at: Murley Moss Business Village, Oxenholme Road, Kendal, Cumbria, LA9 7RL. or to CPH.CoastalAccess@naturalengland.org.uk | |
| <p>(a) A fair balance means a fair balance between the interests of the public in having rights of access over land, and the interests of any person with a relevant interest in the land (see paragraph 1(b) of Schedule 1A to the National Parks and Access to the Countryside Act 1949 and section 297(3) of the Marine and Coastal Access Act 2009).</p> <p>(b) See paragraph 3(5) of Schedule 1A to the National Parks and Access to the Countryside Act 1949. The requirements of paragraph 3(6) of that Schedule are that the modified proposals are practicable; take account of the matters mentioned in sections 297(2) and (where appropriate) 301(4) of the Marine and Coastal Access Act 2009 (matters to which Natural England and the Secretary of State must have regard when discharging the coastal access duty); and are in accordance with the scheme approved under section 298 of that Act (the scheme in accordance with which Natural England must act when discharging the coastal access duty) or, where that scheme has been revised, the revised scheme.</p> | |