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Proposed changes to the England
Coast Path at

Silloth Docks, Silloth, Cumbria

Natural England's Variation Report to the Secretary of State

**Coastal Access Variation Report GAL VR13
July 2022**



Part 1: Purpose of this report

1.1 Natural England has a statutory duty under the Marine and Coastal Access Act 2009 to improve access to the English coast. The duty is in two parts: one relating to securing a long-distance walking route around the coast; the other to creating an associated “margin” of land for the public to enjoy, either in conjunction with their access along the route line, or otherwise.

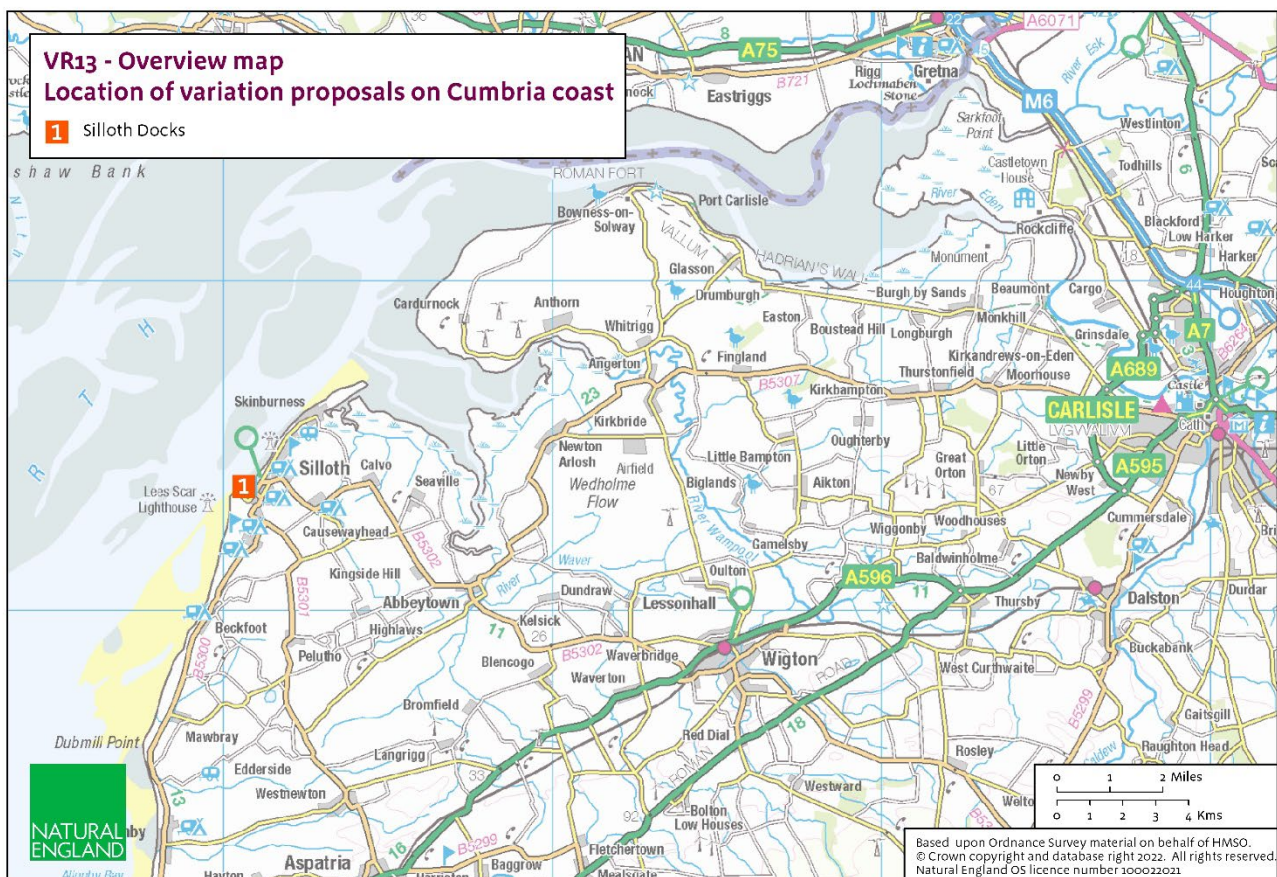
1.2 On 1st October 2021, the Secretary of State approved Natural England’s proposals relating to the coast between Rumbling Bridge, Abbeytown and Allonby, which formed part of our proposals for the [Gretna to Allonby](https://www.gov.uk/government/consultations/england-coast-path-from-gretna-to-allonby-comment-on-proposals) stretch [https://www.gov.uk/government/consultations/england-coast-path-from-gretna-to-allonby-comment-on-proposals]. Whilst the proposals have been approved, Natural England and Cumbria County Council are currently working to prepare the trail for public use and, as such, the coastal access rights for this stretch have yet to commence.

1.3 Since the approval of the report, it has become clear that changes are necessary to the route of the England Coast Path. This report contains Natural England’s proposals relating to a change near to Silloth Docks, which is at the location shown on the Variation Location Map below.

1.4 In order for this proposed change to come into force it must be approved by the Secretary of State.

1.5 The original stretch [Overview](#)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/537589/gretna-allonby-overview.pdf] provides vital context to the proposals set out in this VR.



Part 2: Proposed variation at Silloth Docks

Start Point: Grid reference: NY 1084 5329

End Point: Grid reference: NY 1048 5345

Relevant Original Proposal Map: GAL 5a

2.1 Introduction

Reason for variation:

2.1.1 Natural England's original proposals for the coast between Gretna and Allonby were published in July 2016. However, a European Court judgment handed down in April 2018, known colloquially as 'People over Wind', affected how the impact of such proposals on environmentally protected sites could be assessed. As a consequence, the Secretary of State was unable to approve any part of the proposals until October 2021. Subsequently, whilst preparing for establishment of the approved parts of this stretch, we became aware of changes in land management in the vicinity of Silloth Docks, which have led us to conclude that a minor adjustment to the approved route is required. Vehicle movements, including heavy goods vehicle movements, have increased along this track since the publication of our original proposals, making it less suitable as part of a national trail. These changes will allow the route to be established to a safer design, suitable for those with reduced mobility, as well as providing a better fit with current land management practices in the vicinity.

Proposed variation:

2.1.2 The approved route of the ECP to the immediate south of Silloth Docks follows a vehicular track, past the entrance to the golf club, to an informal car parking area adjacent to the outer dock. See sections GAL-5-S010 to GAL-5-S013 in chapter 5 of the Gretna to Allonby report. The proposed variation has been discussed with the owners and occupiers of affected land, who are content with the changes.

2.1.3 The proposed variation would involve the creation of a new route, between the golf clubhouse and the informal car park, parallel with and close to the southern side of the access track. Adjacent to the golf clubhouse, this would require some excavation to create a suitable path along the line of the grassy embankment. Further west, it would be necessary to clear some low-growing scrub to create a corridor for the proposed route.

2.1.4 As a consequence of these proposed changes, there would be a very minor change to the landward extent of the coastal margin, affecting section GAL-5-S010 and most of GAL-5-S011.

2.1.5 We believe that the changes would improve the recreational experience on this part of the ECP by almost completely segregating vehicular traffic and walkers (the path will still need to cross entrances to the golf club car park and the nursing & residential care home).

Considering the options:

2.1.6 We have worked closely with the access authority and have sought advice from representatives of national and local organisations with a strategic interest in this length of coast – the Cumbria & Lake District Local Access Forum, the Disabled Ramblers, the Ramblers and the Open Spaces Society.

2.1.7 Below we set out the alignment options that we considered:

- We considered various options for a revised route in this area, including existing access roads and paths. In our view, the proposed revised route provides the best overall experience for walkers whilst also minimising impacts on land management operations. The proposed route would provide a direct connection between the town and the shore adjacent to the outer dock (an area which seems to be very popular with local people), whilst largely avoiding areas likely to see ongoing and regular vehicle movements. Southwards from the outer dock gate, the path continues to follow the coast quite closely, and maintains good views out to sea.

2.2 Proposals Narrative

The Trail:

2.2.1 The proposed variation to the approved trail (from east to west):

- Would follow a new path across the grass bank at the front of the golf clubhouse, before crossing the entrance to the golf club car park;
- Would then follow a newly created path generally parallel to and a few metres from the existing vehicular track; and
- Finally, it would connect with the approved route in the vicinity of the existing informal car park, adjacent to the outer dock.
- Includes 3 sections of new path.
- Follows the coastline as closely as is possible in this area. Views of the sea are restricted by the dunes and the port infrastructure, which would similarly have been the case with the original route.
- Extends for a length of approximately 400 metres at a maximum of 5 metres south of the approved route.

Map VR13a shows details of the proposed change to the route.

Protection of the environment:

2.2.2 In this part of the report, we explain how we have taken account of environmental protection objectives in developing our proposals to vary the line of the trail.

2.2.3 The section of trail affected by this variation passes through an area of fixed dune grassland.

2.2.4 The following designated sites affect this length of coast:

- Solway Firth SPA, Solway Firth SAC and Upper Solway Flats and Marshes Ramsar site.
- Silloth Dunes and Mawbray Bank SSSI

Map VR13b - Key Statutory Environmental Designations - shows the extent of these designated sites in relation to the proposal.

2.2.5 The proposals will not have a significant impact upon Solway Firth SPA, Solway Firth SAC or Upper Solway Flats and Marshes Ramsar site. The proposed ECP is aligned over 150m away from the

boundary of these sites. The area in the immediate vicinity of the proposed ECP is not used by roosting or breeding waterbirds.

2.2.6 The proposed ECP is aligned just within the boundary of Silloth Dunes and Mawbray Bank SSSI, through an area of fixed dune grassland. We propose to clear a section of low-growing scrub at the edge of the vehicle track to provide walkers with a vehicle-free route. There is a low risk of the scrub removal impacting on the dune grassland. The vegetation work would be undertaken using a brush-cutter and can be accessed directly from an existing vehicle track, meaning there will be no vehicle movements across this habitat during path establishment. This part of the path would not be surfaced, so there will be no permanent loss of habitat.

2.2.7 Natterjack toads and great crested newts are also features of the SSSI. The proposed route is not in the immediate vicinity of any breeding ponds and therefore the risk of disturbance to these species by path users is low. Cumbria County Council will provide detailed method statements when they apply for SSSI assent, outlining how they will avoid impacting these features during the establishment phase.

2.2.8 Natural England is satisfied that the proposals for coastal access in this variation report are made in accordance with relevant environmental protection legislation

Accessibility:

2.2.9 The proposed trail would largely comprise a soil and turf surface. However, part of the new route, in the vicinity of the golf clubhouse, is likely to be surfaced with crushed aggregate, to achieve a more durable path. We would expect the new route to be at least as accessible as the approved route and it will be designed to accommodate off-road mobility scooters. There are no obvious barriers to accessibility on the proposed variation itself, although the surface will become more challenging as the approved route moves into the dune area.

Where we have proposed exercising statutory discretions:

2.2.10 **Landward boundary of the coastal margin:** We have used our discretion on one section of the varied route to map the landward extent of the coastal margin to an adjacent physical boundary (in this case, the seaward edge of a minor road and parking area), to make the extent of the new access rights clearer. See Table 2.3.1 below.

2.2.11 Adjacent to section GAL-VR13-S002 we have used this discretion to limit the landward extent of the coastal margin to the landward edge of the trail. This has had the effect of slightly reducing the area of coastal margin that would have otherwise been available by default. This option provides the most clarity because:

- The edge of the proposed path corridor through scrub would provide an easily identifiable boundary for access users.
- There is no clear boundary feature that could mark the boundary of what would otherwise be default coastal margin.

2.2.12 Adjacent to section GAL-VR13-S003, we have used our discretion to propose the inclusion of additional, more extensive landward areas within the coastal margin, to secure or enhance public enjoyment of this part of the coast. The owner of this land is content for us to propose this.

2.2.13 The Proposals Table shows where we are proposing to alter the default landward boundary of the coastal margin. These proposals are set out in columns 5b and 5c of table 2.3.1.

2.2.14 During the preparation of this variation report, it has come to our attention that an error was included within Chapter 5 of the original Gretna to Allonby report. Whilst the text at paragraphs 5.3.10 to 5.3.12 of that report correctly describes the intended extent of the coastal margin, map GAL 5a did not show the same extent. This is now correctly depicted in map VR13a below.

See part 3 of the Overview to the original report - 'Understanding the proposals and accompanying maps', for an explanation of the default extent of the coastal margin and how we may use our discretion to adjust the margin, either to add land or to provide clarity.

2.2.15 **Restrictions and/or exclusions:** Access rights to the seaward margin would be subject to the excepted land rules and the national restrictions on coastal access rights. We do not propose any additional local restrictions or exclusions.

2.2.16 **Coastal erosion:** Natural England is able to propose that the route of the trail would be able to change in the future, without further approval from the Secretary of State, in response to coastal change. This would happen in accordance with the criteria and procedures for 'roll-back' set out in part 7 of the Overview.

Natural England may only propose the use of this roll-back power:

- as a result of coastal erosion or other geomorphological processes or encroachment by the sea, or
- in order to link with other parts of the route that need to roll back in direct response to such changes.

2.2.17 Column 4 of table 2.3.1 indicates where the roll-back power has been proposed in relation to a newly proposed route section. Where this is the case, the route, as initially determined at the time this report was prepared, is to be at the centre of the line shown on map VR13a as the proposed route of the trail.

2.2.18 On sections for which roll-back is not proposed in table 2.3.1, the route is to be at the centre of the line shown on map VR13a as the proposed route of the trail.

2.2.19 If at any time in the future any part of a route section upon which roll-back has been specified needs, in Natural England's view, to change in order for the overall route to remain viable, the new route for the part in question will be determined by Natural England without further reference to the Secretary of State. This will be done in accordance with the criteria and procedures described under the title 'Roll-back' in part 8 of the Overview and section 4.10 of the Coastal Access Scheme. If this happens, the new route will become the approved route for that section for the purposes of the Order which determines where coastal access rights apply.

Establishment of the trail:

2.2.20 Below we summarise how our proposed route for the repositioned part of the trail would be physically established to make it ready for public use before any new rights come into force along it.

2.2.21 Our estimate of the capital costs for these works is £8,490. This would have the effect of increasing the overall establishment cost for the Gretna to Allonby stretch by £8,040. These estimates are informed by advice from the access authority.

2.2.22 There are 3 main elements to the overall capital costs:

- Way-marking and signage - £500
- Clearance of vegetation - £1,690
- Path creation and surfacing - £6,300

2.2.23 If the Secretary of State approves our report, Cumbria County Council will liaise with the affected landowners and occupiers about relevant aspects of the establishment works and installation of new signs that are needed on their land. Prior to works being carried out on the ground, all necessary permissions, authorisations and consents will be obtained. All such works would conform to the published standards for National Trails and the other criteria described in our Coastal Access Scheme.

Maintenance of the trail:

2.2.24 Ongoing maintenance of the varied sections of trail would be necessary from time to time. This variation would make no significant change to the annual costs associated with maintaining the approved route as set out in our original report.

Part 2.3: Proposals Tables

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

Table 2.3.1: Map VR13a – Silloth Docks

Key notes on table:

1. Column 4 – ‘No’ means no roll-back is proposed for this route section. ‘Yes – normal’ means roll-back is proposed and is likely to follow the current feature (e.g. cliff edge/beach) for the foreseeable future as any coastal change occurs.
2. Column 4 – ‘Yes – see table 2.3.2’ means roll-back is proposed, but refer to that table below about our likely approach to implementing it for this route section. This is because a more complex situation exists in this case and consideration must be given to how roll-back may happen in relation to excepted land, a protected site etc.
3. Column 5a - Certain coastal land types are included automatically in the coastal margin where they fall landward of the trail if they touch it at some point. The relevant land type (foreshore, cliff, bank, barrier, dune, beach, flat or section 15 land – see Glossary in Annex B to the 2017 Overview) is shown in this column where appropriate. “No” means none present on this route section.
4. Columns 5b and 5c – Any entry in these columns means we are proposing to align the landward boundary of the coastal margin on this route section with the physical feature(s) shown in 5b, for the reason in 5c. No text here means that for this route section the landward edge of the margin would be that of the trail itself - or if any default coastal land type is shown in 5a, that would be its landward boundary instead.

1	2	3	4	5a	5b	5c	6
Map(s)	New route section number(s)	Current status of route section(s)	Roll-back proposed? (See part 8 of 2017 report Overview)	Landward margin contains coastal land type?	Proposal to specify landward boundary of margin	Reason for landward boundary proposal	Explanatory notes
VR13a	GAL-VR13-S001	Not an existing walked route	No	No			
VR13a	GAL-VR13-S002	Not an existing walked route	No	No	Landward edge of trail	Clarity and cohesion	
VR13a	GAL-VR13-S003	Not an existing walked route	Yes – see table 2.3.2	Yes – dune	Seaward edge of minor road and parking area	Clarity and cohesion. Additional landward area.	

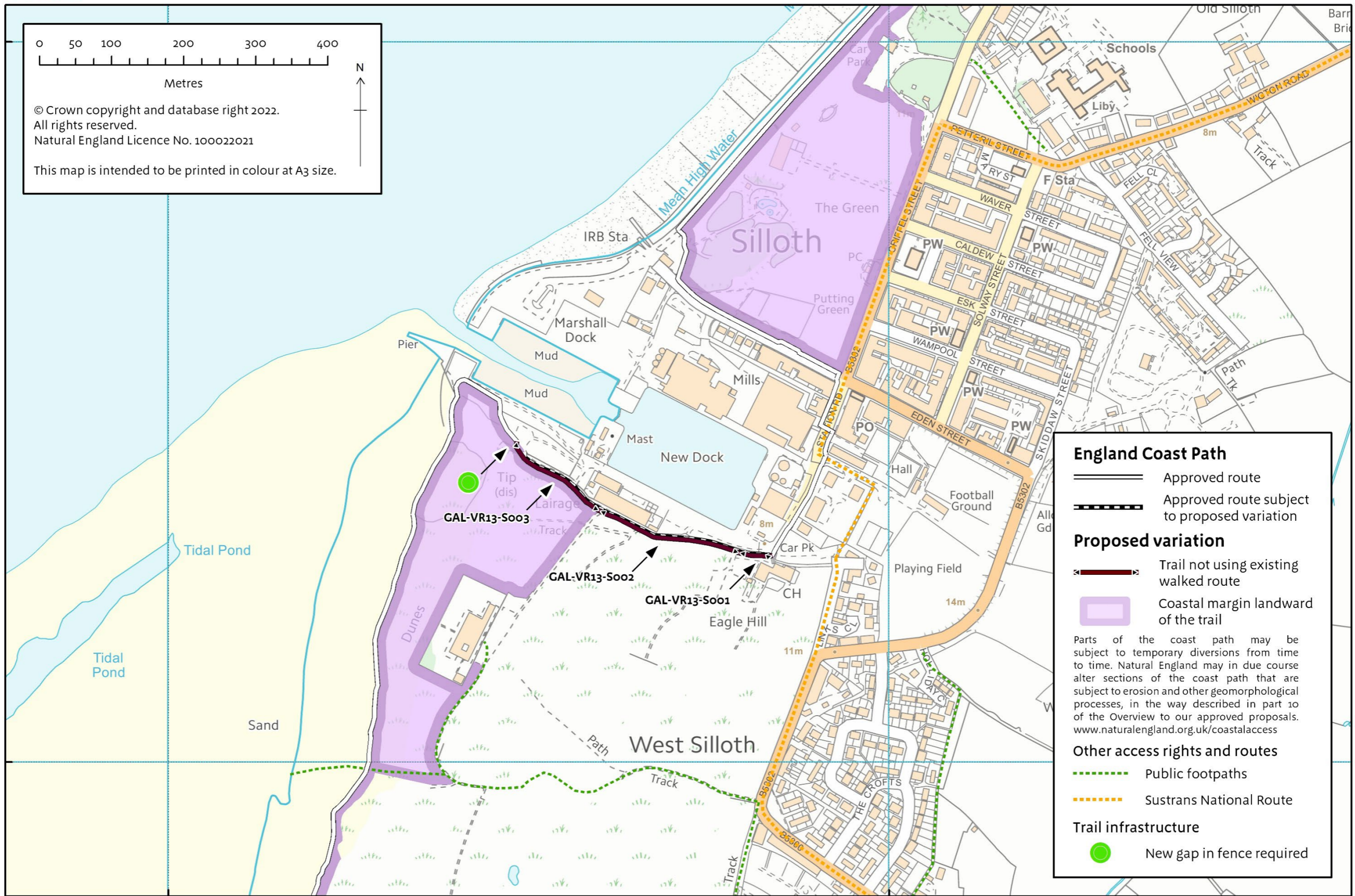
2.3.2 Roll-back implementation – more complex situations: Map VR13a – Silloth Docks

Map(s)	New route section number(s)	Feature(s) or site(s) potentially affected	Our likely approach to roll-back
VR13a	GAL-VR13-S003	Silloth Dunes and Mawbray Bank SSSI	If the existing route is no longer viable through or seaward of a designated site (e.g. SSSI, SAC, SPA, SAM) whose designated features are potentially sensitive to public access, we will choose a new route after detailed discussions with the relevant experts and with any potentially affected owners or occupiers, which will either (a) continue to pass through the site, if appropriate or (b) if necessary, be routed landward of it. Possible impacts on designated site (Silloth Dunes and Mawbray Bank) may need to be considered as part of deciding on a new alignment for the trail. Where necessary, a Habitats Regulations Assessment will be carried out.

0 50 100 200 300 400
Metres

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This map is intended to be printed in colour at A3 size.



England Coast Path

- Approved route
- Approved route subject to proposed variation

Proposed variation

- Trail not using existing walked route
- Coastal margin landward of the trail

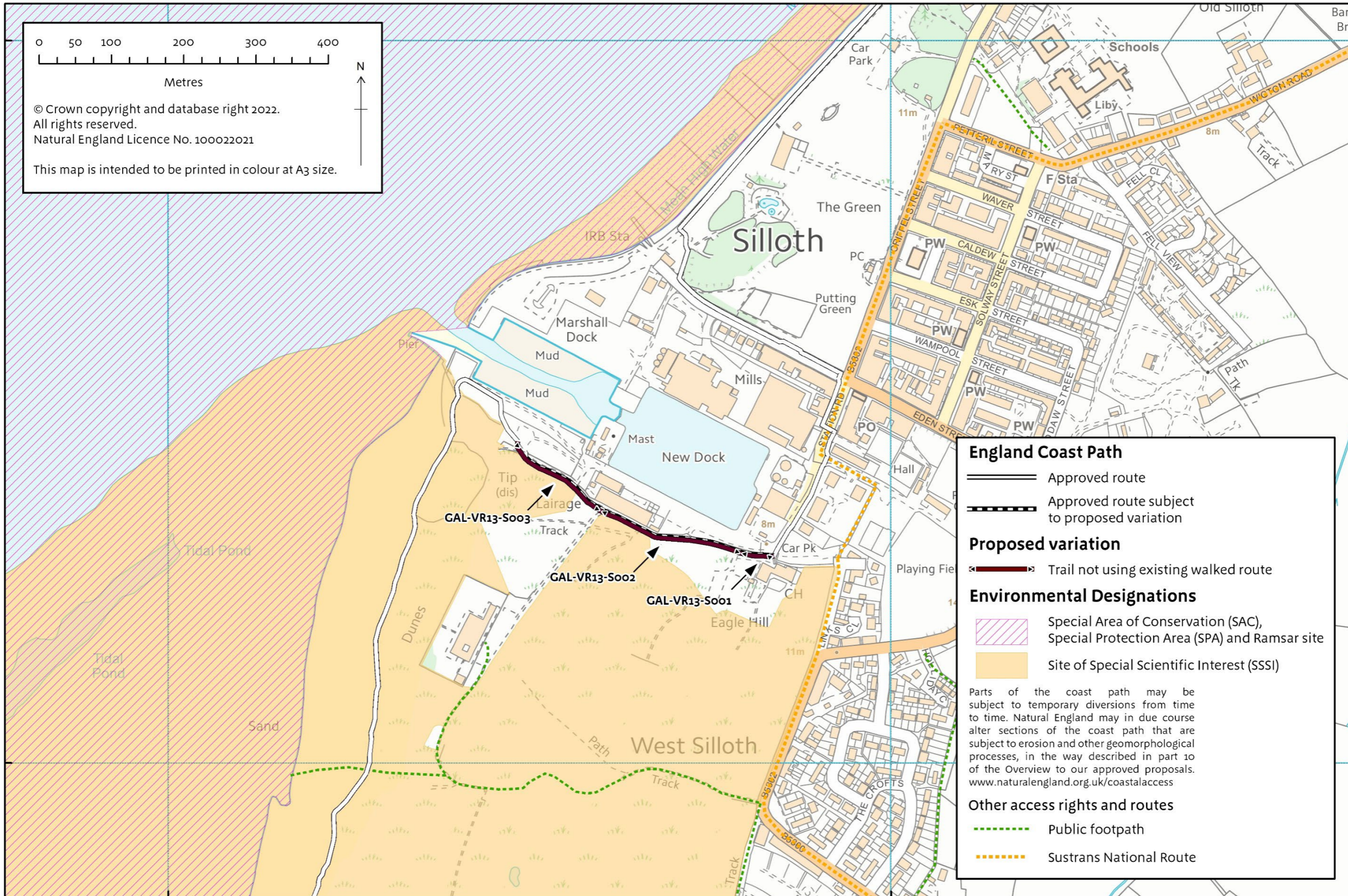
Parts of the coast path may be subject to temporary diversions from time to time. Natural England may in due course alter sections of the coast path that are subject to erosion and other geomorphological processes, in the way described in part 10 of the Overview to our approved proposals. www.naturalengland.org.uk/coastalaccess

Other access rights and routes

- Public footpaths
- Sustrans National Route

Trail infrastructure

- New gap in fence required



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Natural England is here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

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