

# Coastal Access – Silecroft to Silverdale



## Representations on SCS 6: Kents Bank to Cove Well, Silverdale - and Natural England's comments

March 2024

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#### 1. Introduction

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.

#### 2. Background

Natural England's compendium of reports setting out its proposals for improved access to the coast from Silecroft to Silverdale was submitted to the Secretary of State on 8<sup>th</sup> January 2020. This began an eight week period during which representations and objections about each constituent report could be made.

In relation to the report for SCS 6, Natural England received 19 representations, of which 2 were made by organisations or individuals whose representations must be sent in full to the Secretary of State in accordance with paragraph 8(1)(a) of Schedule 1A to the National Parks

and Access to the Countryside Act 1949. These ‘full’ representations are reproduced in Section 3 of this document together with Natural England’s comments where relevant.

As required by the legislation this document also summarises and, where relevant, comments on the 17 representations submitted by other individuals or organisations, referred to here as ‘other’ representations. Many of these representations make common comments on crossing the Kent Estuary, whilst often also raising various other concerns.

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

### 3. Record of ‘full’ representations and Natural England’s comments on them

<b>Representation number:</b>	<b>MCA/SCS6/R/18/3229</b>
<b>Organisation/ person making representation:</b>	Ramblers – [redacted]
<b>Route section(s) specific to this representation:</b>	Full report
<b>Other reports within stretch to which this representation also relates:</b>	N/A
<b>Representation in full</b>	
<p>We accept that, while under Marine and Coastal Access Act, 2009 (the 2009 Act) there is no requirement for the ECP to extend up any estuary further than the seaward limit of estuarial waters, NE has a discretion to propose that the trail should extend from the seaward limit as far as the first bridge over which there is a public right of way or a public right of access. These matters are covered in detail in Part B and Chapter 10 of the Coastal Access Scheme. This is within the context of s296 of the 2009 Act that places a legal duty of NE and the SoS to secure a <u>continuous</u> walking route around the whole of the coast of England.</p> <p>s297 of the 2009 Act requires that, in discharging this duty, NE should have regard (amongst other considerations) to keeping interruptions to the route at a minimum. In short, route continuity is an important consideration. We consider that this duty to secure continuity has not been discharged in omitting the route of the ECP between Grange-over-Sands and Arnside around the Kent Estuary.</p> <p>We recognise that the Kent Estuary is one of numerous estuaries around the Cumbrian coast of very differing character and thus all require an individual approach. Nonetheless there is an overriding need to ensure consistency of treatment and to fully uphold s297 of the 2009 Act.</p> <p>The seaward limits of the Kent estuary can only be approximated and we welcome NE’s willingness to exercise their discretion to consider a route around the whole estuary. We note the stated geographical limits of NE’s discretion on p19 in the Overview.</p> <p>We have considered the case against s301 criteria as outlined in the Approved Scheme.</p> <p><u>STATUTORY ESTUARY CHARACTER</u></p> <p><u>i) Ferry Service</u> We agree there is no existing ferry service.</p> <p>We disagree there is a regular train service between Grange and Arnside stations. There is a regular <u>timetabled</u> service; however, the trains on this route are not always reliable, despite the introduction of new replacement train stock. Indeed, the operators are not only amongst the two worst performing in the country but one has been characterised by such a significant number of serious problems that government has removed the franchise to operate the services once provided by Northern Trains. We have requested, from the two train operators on this section on the Furness Line statistics as to cancellations and punctuality for 2019 but this has not been forthcoming.</p> <p>Even allowing for an enhancement of services over the next few years, the service does not appear to provide the certainty walkers will need and there is no suitable bus service in this locality when the trains fail to run. We</p>	

believe, in this case, that NE has not assessed the actual level of service that would be experienced by walkers having to use the train line to continue their journey along the ECP.

## ii) Character of the Estuary

### a) Estuary Width

We note the width figures quoted in the Overview. We have comments, below, as to the landscape character of the estuary.

### b) Topography of the Shoreline

Whilst the estuary is narrower above Heversham (p.28 of NE's Overview) this forms an integral part of the character of any estuary and exploration of such stretches helps understand better the estuarine landscape. Any attempt to divorce one part of an estuary from another is both artificial and futile within the concept of an estuary. Much of the upper estuary lies within the Lake District National Park and the inscribed World Heritage Site, further underlining the value of a route around the upper estuary. Other parts lie within the Arnside-Silverdale AONB. The only section with no current landscape designation is the subject of an application to include the landscape with an extended LDNP. The path would provide a good walking link between the Lake District National Park and the Arnside-Silverdale AONB and such a physical link would be supported by the findings of the recent government-commissioned review of designated landscapes (the Glover Report).

From our proposed ECP route (see below) alongside the B5282, at approximately SD482811, there is one of the most dramatic views along the estuary and up towards the Lakeland fells whose waters drain down into the River Kent and this estuary. The landscape viewed from this stretch of the estuary coast is at odds with NE's argument that "*The character of the estuary is progressively less coastal and more riverine*" (Silecroft to Silverdale Overview Document page 31.)

### c) Nature of affected land

We note this summary of the nature of affected land. The call-outs for the rescue services have not, to our knowledge, been for people walking the Cumbria Coastal Way. Nothing in NE's proposals will stop the people who wish to explore the sands of the Bay and to discriminate against potential walkers of the ECP by not providing a route is totally unacceptable. As we understand that few call outs have been in the area of sands north of the Arnside railway viaduct, we find NE's argument on this matter untenable.

### d) Features of Interest

We note this brief summary and this also applies to the area north of the railway viaduct. The route north of the viaduct will provide one of the best places in England to observe, without disturbance, fishing osprey. The ability to see the river Kent virtually from source to sea adds to the varied interest of the route (see *b*) above).

### e) Recreational Benefit

The creation of a loop route around the upper estuary will have a lasting value, even if the pedestrian walkway over the viaduct is ever completed; it will be a superb route much appreciated by walkers and naturalists. The continuation of the route around the estuary is fully in accord with the second statutory purpose for national park designation as well as within the scope of the Approved Scheme.

### f) Excepted Land

We note NE's position on pp 30-31. Please refer to our separate representation on Directions proposed for the Silecroft to Silverdale stretch.

### v) Options for the Kent Estuary

Option 1: We agree with NE that this is an unsatisfactory option.

Option 2: We ask that this option be given urgent consideration. It can be, if necessary, achieved without the provision of a footbridge over the river Bela given the principle established by NE and the Secretary of State (SoS) for crossings of the rivers Esk and Irt further north along the Cumbria coast.

Option 3: We do not accept that Option 3 is the most suitable and urge the SoS to reject it on the grounds that:

- there is no fully reliable convenient means of continuing the coastal journey by rail between Grange and Arnside;
- the new bridge over the Bela is not necessary and therefore no excessive costs are involved. Indeed, given the nature of the western part of our proposed route, it is likely the average cost could, per km of route, be less than the average for the ECP nationally and for Cumbria (see Our Outline Proposal below).
- by definition, some stretches of the route will be above the average cost and we do not accept that this is a reason to dismiss the estuary route

- the character of the landscape of the upper estuary is of great interest and natural beauty. An estuary changes throughout its length in both physical and landscape character. It is this feeling of knowing the whole estuary which adds to the enjoyment of a walk. Indeed, the character and value attached to this area of the estuary is so great that it forms an integral part of the Lake District National Park and Lake District World Heritage Site.

Our comments on each section:

We support NE's proposals for SCS-6-S001 to SCS-6-S007

#### Arnside Station to County Boundary

SCS-6-S009 to SCS-6-S047: We support the choice of route in principle. However, there is a need to ensure the surface of the paths are made more readily walkable and sustainable on the waymarked route. Braiding of the path (SCS-6-S042) is causing damage to the SSSI and adding hazards to walkers of this already very popular route. Likewise, SCS-6-S043 needs surface attention as the current limestone intrusions cause significant issues for a range of walkers. We believe this work could be done sensitively whilst retaining the open, wilder feel of this stretch of coast. The path abuts a Local Geological Site which, with well-known fossil beds, may be of interest to ECP walkers.

SCS-6-S048 to SCS-6-S051: We are strongly against these proposals as a route near the coast is both feasible and desirable. Such a route would better meet the objectives of the legislation. The creation of S049 we believe is inside a field edge and in this case a more direct route from the eastern end of S047 could involve a smaller take of land from fields which NE deem in need of a Direction to remove the land from the coastal spreading room. Indeed with our proposal, most of the Direction land (Direction Map 6A) would no longer be spreading room and thus the objective of the Directive could be more effectively observed. Our route would take walkers off a road with potentially serious traffic, cyclists and pedestrian conflicts. In this case we could support the principle of a Direction for the remainder of land on Direction Map 6A.

We support NE's proposals for SCS-6-S052 to SCS-6-S055.

SCS-6-S056 to SCS-6-S062: We are strongly against this proposal as there is the potential to use a formerly walked route, much nearer the coast. Our preference for a route to the seaward side of the new caravan site [S057-S059] is in line with para 8.19.7 of the Approved Scheme (page 138).

SCS-6-S063: We accept, that the Approved Scheme may preclude an alternative to the route on the SDS-6-S063 section of the path due to the curtilage of Cove House Abbeyfield home. However, we wish our concerns for potential user conflicts on the section of Cove Road to be recorded.

#### Our Outline Proposal for the ECP route around the Kent estuary:

- That the route continue northwards from Grange Station. This may have to be landward of the railway line towards Meathop. Some kissing gates may be needed.
- From Crag Wood [SD457807] the route to Levens Bridge would use existing PRoW and s1 CRoW land for the most part with little cost involved.
- There is the potential for a route from Levens Bridge to Ninezergh Farm and onto the B5282 alongside the river and estuary. Some of these embankments are existing walked routes including one that was published in a series of walks by the local churches.
- The route stop at the B road junction
- Bela Bridge: We are told that Cumbria CC highways are not supportive of the ECP using the bridge for reasons of safety. This is hugely surprising given that Cumbria CC, along with South Lakeland District Council, accepted and promoted the use of the bridge for the Cumbria Coastal Way. Indeed, the CCW is still being used (it will be replaced by the ECP as promotion of the CCW will then cease). The increase in numbers using the route are therefore not likely to be significant. We suggest that the ECP can be delineated without any official route over the Bridge. This principle has been accepted further north along the Cumbria coast where NE and the SoS have implemented a policy of stopping the route of the ECP on either bank of the rivers Esk and Irt. These are potentially more hazardous locations than the Bela Bridge. The ECP could follow this established principle and stop on the one side of the bridge and recommence on the other side of the bridge, although we have already noted that it is currently used by CCW walkers. We are unaware of any accidents involving pedestrians on this bridge.
- From west of the Bela bridge the route of the existing Cumbria Coastal Way could be used as could a line alongside, but off the road, until the pavement is reached. Whilst some costs would be needed for the provision of kissing gates we do not accept the conjecture of NE that there would be any significant costs for

'expected complex establishment requirements near Sandside' (p31 of the Overview). This is an existing walked route of long standing and is currently signed as a concessionary route.

**Natural England's comments**

Natural England is grateful to the Ramblers for the support for parts of the proposals. We acknowledge the concerns about the railway service and the extent to which it will offer a suitable solution in the future. We will monitor the regularity and convenience of the service, as we approach commencement on this stretch of coast. As we have stated in our proposals, in the event of a significant reduction in convenience, we would expect to consider the need to vary our proposals.

We are also grateful for the additional thoughts on the assessment of the estuary options, within the representation. We note the concerns as to the surface of the proposed route to Far Arnside and agree that we will need to keep this under review.

The alignment slightly further inland at Far Arnside is proposed on the basis of the conclusions in our Nature Conservation Assessment and the need to ensure that the sensitive flora in the area is protected.

We considered all options for route alignment between Far Arnside and Cove well, but various areas of excepted land require that the route lies slightly further inland here.

We concluded that the existing bridge over the Bela could not safely be incorporated into a National Trail for various reasons, including the lack of a pedestrian walkway, high volumes and speeds of traffic and reduced sight-lines. We do not consider that a route along the road but omitting the bridge itself is a viable option.

**Relevant appended documents (see section 5):**

None

<b>Representation number:</b>	<b>MCA/SCS6/R/19/0016</b>
<b>Organisation/ person making representation:</b>	Open Spaces Society – [redacted]
<b>Route section(s) specific to this representation:</b>	Full report
<b>Other reports within stretch to which this representation also relates:</b>	N/A

**Representation in full**

We accept that, while under Marine and Coastal Access Act, 2009 (the 2009 Act) there is no requirement for the ECP to extend up any estuary further than the seaward limit of estuarial waters, NE has a discretion to propose that the trail should extend from the seaward limit as far as the first bridge over which there is a public right of way or a public right of access. These matters are covered in detail in Part B and Chapter 10 of the Coastal Access Scheme. This is within the context of s296 of the 2009 Act that places a legal duty of NE and the SoS to secure a continuous walking route around the whole of the coast of England.

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We recognise that the Kent Estuary is one of numerous estuaries around the Cumbrian coast of very differing character and thus all require an individual approach. Nonetheless there is an overriding need to ensure consistency of treatment and to fully uphold s297 of the 2009 Act.

The seaward limits of the Kent estuary can only be approximated and we welcome NE's willingness to exercise their discretion to consider a route around the whole estuary. We note the stated geographical limits of NE's discretion on p19 in the Overview.

We have considered the case against s301 criteria as outlined in the Approved Scheme.

STATUTORY ESTUARY CHARACTER

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We agree there is no existing ferry service.

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train stock. Indeed, the operators are not only amongst the two worst performing in the country but one has been characterised by such a significant number of serious problems that government has removed the franchise to operate the services once provided by Northern Trains. We have requested, from the two train operators on this section on the Furness Line statistics as to cancellations and punctuality for 2019 but this has not been forthcoming.

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- d) The route stop at the B road junction
- e) Bela Bridge: We are told that Cumbria CC highways are not supportive of the ECP using the bridge for reasons of safety. This is hugely surprising given that Cumbria CC, along with South Lakeland District Council, accepted and promoted the use of the bridge for the Cumbria Coastal Way. Indeed, the CCW is still being used (it will be replaced by the ECP as promotion of the CCW will then cease). The increase in numbers using the route are therefore not likely to be significant. We suggest that the ECP

can be delineated without any official route over the Bridge. This principle has been accepted further north along the Cumbria coast where NE and the SoS have implemented a policy of stopping the route of the ECP on either bank of the rivers Esk and Irt. These are potentially more hazardous locations than the Bela Bridge. The ECP could follow this established principle and stop on the one side of the bridge and recommence on the other side of the bridge, although we have already noted that it is currently used by CCW walkers. We are unaware of any accidents involving pedestrians on this bridge.

- f) From west of the Bela bridge the route of the existing Cumbria Coastal Way could be used as could a line alongside, but off the road, until the pavement is reached. Whilst some costs would be needed for the provision of kissing gates we do not accept the conjecture of NE that there would be any significant costs for 'expected complex establishment requirements near Sandside' (p31 of the Overview). This is an existing walked route of long standing and is currently signed as a concessionary route.

**Natural England's comments**

Natural England is grateful to the Open Spaces Society for the support for parts of the proposals.

We acknowledge the concerns about the railway service and the extent to which it will offer a suitable solution in the future. We will monitor the regularity and convenience of the service, as we approach commencement on this stretch of coast. As we have stated in our proposals, in the event of a significant reduction in convenience, we would expect to consider the need to vary our proposals.

We are also grateful for the additional thoughts on the assessment of the estuary options, within the representation. We note the concerns as to the surface of the proposed route to Far Arnside and agree that we will need to keep this under review.

The alignment slightly further inland at Far Arnside is proposed on the basis of the conclusions in our Nature Conservation Assessment and the need to ensure that the sensitive flora in the area is protected.

We considered all options for route alignment between Far Arnside and Cove well, but various areas of excepted land require that the route lies slightly further inland here.

We concluded that the existing bridge over the Bela could not safely be incorporated into a National Trail for various reasons, including the lack of a pedestrian walkway, high volumes and speeds of traffic and reduced sight-lines. We do not consider that a route along the road but omitting the bridge itself is a viable option.

**Relevant appended documents (see section 5):**

None

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

<b>Representation ID:</b>	<b>MCA/SCS6/R/1/3449</b>
<b>Organisation/ person making representation:</b>	[redacted]
<b>Name of site:</b>	Kent Estuary
<b>Report map reference:</b>	Not specified
<b>Route sections on or adjacent to the land:</b>	Train service between Arnside and Grange-over-Sands
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b>	
The representation disagrees with Natural England's proposal to end the route at Grange-over-Sands and Arnside railway stations (allowing walkers to cross the estuary by means of trains), instead of providing a continuous route around the Kent Estuary. It mentions that the train service is hourly, and goes on to provide some level of detail as to a route which might be followed by the ECP, around the upper Kent Estuary.	
<b>Natural England's comment:</b>	
Natural England considered the option of a continuous route around the upper Kent Estuary (including the Gilpin and the Bela, which flow in to the Kent Estuary). However, we concluded that it did not make sense to pursue this route in light of the expected difficulties and costs involved, particularly given the reasonably convenient train service across the estuary. The complexity of the upper estuary would also make such route lengthy and indirect. We have made it clear in our proposals that any reduction in the level of train service, which would tend to make this service less convenient for walkers, would trigger a consideration of the need for variation of any approved route in this area.	



**Relevant appended documents (see Section 5):**

None

<b>Representation ID:</b>	<b>MCA/SCS6/R/2/0042</b>
<b>Organisation/ person making representation:</b>	Beetham Parish Council - [redacted]
<b>Name of site:</b>	Upper Kent Estuary
<b>Report map reference:</b>	Not specified
<b>Route sections on or adjacent to the land:</b>	Not specified
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b>	
<p>The representation suggests that NE should have made proposals for a continuous route around the Kent Estuary, rather than only as far as the railway stations stated. The point is made that, whilst the timetable for rail services seems to imply that they are regular, the reality is very different, as a result of frequent cancellations. NE's consideration of the factors relating to the estuary discretion is questioned, raising the various land designations locally and the landscape/character of the upper estuary.</p> <p>The suggestion is made that a continuous route might be achieved by using the existing Bela road bridge, rather than establishing a new pedestrian bridge.</p>	
<b>Natural England's comment:</b>	
<p>We accept that many of the factors considered within our proposals, in relation to the use of our estuary discretion, are subjective and that others may well come to a different conclusion. We accept that the proposal is based on the train service being reasonably convenient as a means of crossing the estuary and that, if this ceases to be the case, we may well need to consider proposing a variation to any approved route, in the future. The change in management of this part of the railway network may well resolve these issues prior to rights commencing on this stretch. We will keep this aspect under review.</p>	
<b>Relevant appended documents (see Section 5):</b>	
None	

<b>Representation ID:</b>	<b>MCA/SCS6/R/3/3454</b>
<b>Organisation/ person making representation:</b>	[redacted]
<b>Name of site:</b>	Road near Holgate's Caravan Park
<b>Report map reference:</b>	Not specified
<b>Route sections on or adjacent to the land:</b>	SCS-6-S048 to S063
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b>	
<p>Concerns expressed about proposed route following road, on the basis that this carries considerable volume of traffic, with no footpath or pavement alongside. Suggested modification for trail to follow existing public footpath through Holgate's Caravan Park. Further suggested modification for the trail to then follow a new route on the seaward side of the road, between the caravan site entrance and Cove Lane.</p>	
<b>Natural England's comment:</b>	
<p>In fact, although perhaps not clear on the proposals maps, the proposed route follows the road itself or the verge (where available) for only some 110m at the western end of this area and an additional 60m at the eastern end, adjacent to the Cove Lane junction. In the first instance, this is to avoid a Site of Special Scientific Interest (vulnerable to access) and in the second, to avoid excepted land immediately adjacent to the road. In both cases, the route proposed has been considered by Cumbria Highways officers and deemed to be safe, with appropriate</p>	

signs etc. The intervening parts of the proposed trail in this vicinity will follow a new route, seaward of the road and separated from traffic.

**Relevant appended documents (see Section 5):**

None

<b>Representation ID:</b>	<b>MCA/SCS6/R/4/3455</b>
<b>Organisation/ person making representation:</b>	[redacted]
<b>Name of site:</b>	Not specified
<b>Report map reference:</b>	Not specified
<b>Route sections on or adjacent to the land:</b>	SCS-6-S055 to S063
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b>	
The representation questions the need for the proposed s25A exclusion southeast of Far Arnside, given the popularity of this area with walkers. It also advises that the base mapping used in Natural England's reports is inaccurate and outdated.	
<b>Natural England's comment:</b>	
Natural England took advice from key bodies, including HM Coastguard and the RNLI, when considering where it might be necessary to exclude access on grounds of suitability, under s25A. We acknowledge that the area is popular with local people, but are obliged to consider new visitors from further afield, who are much less likely to have good local knowledge about the tides, presence of quicksand etc. The exclusion proposed relates solely to proposed new coastal access rights and does not affect any historic, permissive or private rights. We are aware that the OS base mapping does not reflect the situation on the ground; this is inevitable, given the constant change on many parts of the coast. Any such exclusions are mapped, as far as is possible, against recognisable features such as river channels - with the expectation that visitors will recognise those features as boundaries, even if they have subsequently migrated.	
<b>Relevant appended documents (see Section 5):</b>	
Photos of shoreline to illustrate no channel currently exists close to shore.	

<b>Representation ID:</b>	<b>MCA/SCS6/R/5/3456</b>
<b>Organisation/ person making representation:</b>	Levens Parish Council – [redacted]
<b>Name of site:</b>	Upper Kent Estuary
<b>Report map reference:</b>	Between SCS6b & 6c
<b>Route sections on or adjacent to the land:</b>	SCS-6-S008 & SCS-6S009
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b>	
The representation expresses disappointment that the proposals do not include a continuous route around the upper Kent Estuary. It specifically supports Option 2, as detailed in the SCS Overview document.	
<b>Natural England's comment:</b>	
Natural England acknowledges that a continuous walking route would have been preferable, all other factors taken into account. However, we believe that the proposed route, as far as the railway stations at Grange-over-Sands and Arnside, is entirely consistent with the advice in the approved Coastal Access Scheme.	
<b>Relevant appended documents (see Section 5):</b>	
None	

<b>Representation ID:</b>	MCA/SCS6/R/6/0097
<b>Organisation/ person making representation:</b>	Grange-over-Sands Town Council – [redacted]
<b>Name of site:</b>	Kentsford Road to the coastal path, near Kents Bank
<b>Report map reference:</b>	
<b>Route sections on or adjacent to the land:</b>	Not specified, but taken to be SCS-6-S002 onwards
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b> The representation requests that a path between Kentsford Road and the proposed main route is rendered fully accessible.	
<b>Natural England's comment:</b> Natural England welcomes the suggestion from the parish council and will be happy to discuss this in more detail, in preparation for the establishment phase. Some further clarity on the location of the route would be required.	
<b>Relevant appended documents (see Section 5):</b> None	

<b>Representation ID:</b>	<b>MCA/SCS6/R/7/3460</b>
<b>Organisation/ person making representation:</b>	[redacted]
<b>Name of site:</b>	Areas of exclusion on the foreshore at Arnside to New Barns Bay and on the foreshore at Cove Well, Silverdale.
<b>Report map reference:</b>	SCS6a and SCS6d
<b>Route sections on or adjacent to the land:</b>	SCS-6-S012 to S036 and SCS-6-S055 to S063
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b> The representation questions the consistency around proposals to exclude access, under s25A, from areas of foreshore between Arnside and New Barns, and near to Cove Well.	
<b>Natural England's comment:</b> Natural England took advice from key bodies, including HM Coastguard and the RNLI, when considering where it might be necessary to exclude access on grounds of suitability, under s25A. We acknowledge that these areas are popular with local people, but are obliged to consider new visitors from further afield, who are much less likely to have good local knowledge about the tides, presence of quicksand etc. The exclusion proposed relates solely to proposed new coastal access rights and does not affect any historic, permissive or private rights.	
<b>Relevant appended documents (see Section 5):</b> None	

<b>Representation ID:</b>	<b>MCA/SCS6/R/8/3256</b>
<b>Organisation/ person making representation:</b>	Arnside Parish Council – [redacted]
<b>Name of site:</b>	
<b>Report map reference:</b>	SCS 6c, 6d and 6e
<b>Route sections on or adjacent to the land:</b>	SCS-6-S026 to SCS-6-S028, SCS-6-S040 FP and SCS-6-S044 FP, SCS-06-S049 to SCS-6-S059/S060

<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b> The representation expressly recommends Option 2 detailed in the SCS Overview (a continuous route around the upper Kent Estuary) or, alternatively, a new walkway on the side of the railway viaduct. It goes on to recommend modifications via an existing public footpath, avoiding the road at Far Arnside. Finally, it points to some specific sections of the proposed main route that are considered dangerous or in need of work.	
<b>Natural England's comment:</b> Natural England is grateful to the parish council for the information provided. We acknowledge that a continuous walking route around the upper Kent Estuary would have been preferable, all other factors taken into account. However, we believe that the proposed route, as far as the railway stations at Grange-over-Sands and Arnside, is entirely consistent with the advice in the approved Coastal Access Scheme. We did consider the suggested modification but believe that the proposed route is a better solution. In fact, very little of the route between Far Arnside and Cove Well is on the road - most of this route will follow a newly created path on the seaward side of the road.	
<b>Relevant appended documents (see Section 5):</b> None	

<b>Representation ID:</b>	<b>MCA/SCS6/R/9/3462</b>
<b>Organisation/ person making representation:</b>	[redacted]
<b>Name of site:</b>	Not specified
<b>Report map reference:</b>	SCS6b, 6c, 6e
<b>Route sections on or adjacent to the land:</b>	Proposed use of rail crossing between SCS-6-S008 and SCS-6-S009 Proposed route between SCS-6-S050RD and SCS-6-S051RD, and also SCS-6-S062
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b> The representation expresses a preference for a continuous route around the upper Kent Estuary, as per Option 2 in the SCS Overview. It goes on to provide various evidence to support this, including concerns about the convenience of the railway connection. There is a suggestion that the existing road bridge over the Bela is adequate and that a new bridge is not therefore necessary. There is an additional concern about the path joining the road on a bend, at Far Arnside, and a suggestion for a modification via an existing public right of way. Finally, there is a request to ensure that wild aconite, near to SCS-6-S062, are protected.	
<b>Natural England's comment:</b> Natural England acknowledges that a continuous walking route around the upper Kent Estuary would have been preferable, all other factors taken into account. However, we believe that the proposed route, as far as the railway stations at Grange-over-Sands and Arnside, is entirely consistent with the advice in the approved Coastal Access Scheme. We will review the convenience and regularity of train services, as we move towards commencement of new rights on this stretch. We do not believe that the Bela bridge is safe as part of a promoted National Trail, given the volumes and speeds of traffic, the lack of a pedestrian walkway and the limited sight lines. Having taken advice from Cumbria Highways, we are content that the section of path on the road at Far Arnside will be safe for walkers, given various establishment works that are anticipated. We would expect Cumbria County Council to take account of all relevant legislation and best practice, concerning the natural environment, during establishment works.	
<b>Relevant appended documents (see Section 5):</b> None	

<b>Representation ID:</b>	<b>MCA/SCS6/R/10/3463</b>
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<b>Organisation/ person making representation:</b>	Arnside Ramblers – [redacted]
<b>Name of site:</b>	Upper Kent Estuary
<b>Report map reference:</b>	Between SCS6b & 6c
<b>Route sections on or adjacent to the land:</b>	SCS-6-S008 and SCS-6-S009
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b>	
<p>The representation firstly expresses concerns about the suitability of the train service for walkers, and refers to a plan for a walkway on the side of the railway viaduct. There are suggestions to improve the safety of the Bela road bridge, for walkers, by means of traffic light delay system, presumably as part of a continuous walking route around the upper Kent Estuary, as per Option 2 in the SCS Overview.</p>	
<b>Natural England's comment:</b>	
<p>Natural England acknowledges that a continuous walking route would have been preferable, all other factors taken into account. However, we believe that the proposed route, as far as the railway stations at Grange-over-Sands and Arnside, is entirely consistent with the advice in the approved Coastal Access Scheme.</p> <p>We also agree that a walkway on the side of the railway viaduct, in line with long-held local aspirations, would be very beneficial. Whilst some progress towards this aim is being made, it is unlikely to become a reality in the short to medium term and is thus beyond the remit of the coastal access programme.</p> <p>We concluded that the existing bridge over the Bela could not safely be incorporated into a National Trail for various reasons, including the lack of a pedestrian walkway, high volumes and speeds of traffic and reduced sight-lines. A staged traffic light system might help to address some of these concerns, but would have consequences in terms of traffic management.</p>	
<b>Relevant appended documents (see Section 5):</b>	
None	

<b>Representation ID:</b>	<b>MCA/SCS6/R/11/3466</b>
<b>Organisation/ person making representation:</b>	[redacted]
<b>Name of site:</b>	Not specified
<b>Report map reference:</b>	SCS6b, 6c and 6e
<b>Route sections on or adjacent to the land:</b>	SCS-6-S008, SCS-6-S009, SCS-6-S048 to SCS-6-S055
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b>	
<p>The representation expresses concerns over the lack of convenience of the railway, for walkers. It goes on to provide views on the assessment of the estuary options, as detailed in the SCS Overview, on a number of grounds. A strong preference is then expressed for Option 2 - a continuous route around the estuary - with suggestions as to how this might be achieved. Finally, a suggestion is made that the ECP might extend only as far as either side of the Bela bridge, in order to avoid concerns over safety (with the suggestion that this matches the approach for the Esk and Irt estuaries).</p>	
<b>Natural England's comment:</b>	
<p>Natural England acknowledges that a continuous walking route would have been preferable, all other factors taken into account. However, we believe that the proposed route, as far as the railway stations at Grange-over-Sands and Arnside, is entirely consistent with the advice in the approved Coastal Access Scheme.</p> <p>We will monitor the regularity and convenience of the railway service, as we approach commencement on this stretch of coast. As we have stated in our proposals, in the event of a significant reduction in convenience, we would expect to consider the need to vary our proposals.</p> <p>We concluded that the existing bridge over the Bela could not safely be incorporated into a National Trail for various reasons, including the lack of a pedestrian walkway, high volumes and speeds of traffic and reduced sight-lines. We cannot conclude that a gap in any route for the ECP over the bridge itself would reduce the risk to walkers.</p>	

**Relevant appended documents (see Section 5):**

Document re Cambridge County Council bridge costing is mentioned in the representation but not provided.

<b>Representation ID:</b>	<b>MCA/SCS6/R/12/3468</b>
<b>Organisation/ person making representation:</b>	[redacted]
<b>Name of site:</b>	Rail crossing of the Kent and the road at Far Arnside
<b>Report map reference:</b>	SCS6b, 6c, 6e
<b>Route sections on or adjacent to the land:</b>	SCS-6-S008, SCS-6-S009, SCS-6-S048 to SCS-6-S055
<b>Other reports within stretch to which this representation also relates</b>	N/A
<b>Summary of representation:</b>	
<p>The representation expresses a preference for a continuous route around the upper Kent Estuary, as per Option 2 in the SCS Overview. It also states that the train service is irregular and therefore not convenient for walkers. It goes on to suggest that a continuous estuary route might be enabled via on-demand traffic lights for Bela bridge. The second part of the representation expresses concerns with the proposed main route at Far Arnside, citing road conditions that are hazardous for walkers. Several modification options are suggested.</p>	
<b>Natural England's comment:</b>	
<p>Natural England acknowledges that a continuous walking route would have been preferable, all other factors taken into account. However, we believe that the proposed route, as far as the railway stations at Grange-over-Sands and Arnside, is entirely consistent with the advice in the approved Coastal Access Scheme.</p> <p>We will monitor the regularity and convenience of the railway service, as we approach commencement on this stretch of coast. As we have stated in our proposals, in the event of a significant reduction in convenience, we would expect to consider the need to vary our proposals.</p> <p>We concluded that the existing bridge over the Bela could not safely be incorporated into a National Trail for various reasons, including the lack of a pedestrian walkway, high volumes and speeds of traffic and reduced sight-lines. A staged traffic light system might help to address some of these concerns, but would have consequences in terms of traffic management.</p> <p>We considered the other options for the main route, as suggested in the representation, but consider that the proposed route is the best solution. With advice from Cumbria Highways, we are satisfied that the route can be made safe for walkers, given a package of establishment works.</p>	
<b>Relevant appended documents (see Section 5):</b>	
None	

<b>Representation ID:</b>	<b>MCA/SCS6/R/13/3470</b>
<b>Organisation/ person making representation:</b>	[redacted] and [redacted]
<b>Name of site:</b>	Upper Kent Estuary and Far Arnside to Cove Well
<b>Report map reference:</b>	SCS6b, 6c, 6e and restriction map SCS6D
<b>Route sections on or adjacent to the land:</b>	
<b>Other reports within stretch to which this representation also relates</b>	(Silverdale to Cleveleys SDC1)
<b>Summary of representation:</b>	
<p>The representation begins with a suggestion that a partial route around the upper Kent Estuary might be possible by means of minor roads and bus services. It goes on to advise that the coastline is accreting in certain areas, including in the vicinity of Far Arnside.</p> <p>Concerns are expressed about the consistency and design of proposed access exclusions under s25A, particularly in the vicinity of Far Arnside to Cove Well. The suggestion is made that the risk would be better managed by use of appropriate signs.</p>	
<b>Natural England's comment:</b>	

Natural England acknowledges that a continuous walking route would have been preferable, all other factors taken into account. However, we believe that the proposed route, as far as the railway stations at Grange-over-Sands and Arnside, is entirely consistent with the advice in the approved Coastal Access Scheme. Walkers may well choose to continue their journey around the Kent Estuary, making use of the minor roads, existing footpaths and other opportunities, but we do not believe that it makes sense to include this as part of the main route, for the reasons set out in the SCS Overview.

Natural England took advice from key bodies, including HM Coastguard and the RNLI, when considering where it might be necessary to exclude access on grounds of suitability, under s25A. We acknowledge that the area is popular with local people, but are obliged to consider new visitors from further afield, who are much less likely to have good local knowledge about the tides, presence of quicksand etc. The exclusion proposed relates solely to proposed new coastal access rights and does not affect any historic, permissive or private rights. Signs and notices will play a role in advising walkers and helping them to stay safe, but we are also obliged to propose directions where we believe the evidence supports such measures.

**Relevant appended documents (see Section 5):**

Letter and photographs

<b>Representation ID:</b>	<b>MCA/SCS6/R/14/3472</b>
<b>Organisation/ person making representation:</b>	Silverdale Parish Council – [redacted]
<b>Name of site:</b>	Kents Bank to Silverdale
<b>Report map reference:</b>	Not specified
<b>Route sections on or adjacent to the land:</b>	Whole of SCS6
<b>Other reports within stretch to which this representation also relates</b>	
<b>Summary of representation:</b>	
The representation expresses concerns, in relation to SCS 6, that there was inadequate consultation with the local community, as opposed to with landowners and occupiers.	
<b>Natural England's comment:</b>	
Natural England's approach to the planning of the England Coast Path is explained in Chapter 3 of the approved Coastal Access Scheme; we believe that the steps we have taken are consistent with the approach set out. We have undertaken as much engagement as we can accommodate with the resources at our disposal, and have generally accepted any request for meetings or discussions.	
<b>Relevant appended documents (see Section 5):</b>	
Silverdale Parish Council document covering a number of points	

<b>Representation ID:</b>	<b>MCA/SCS6/R/15/3474</b>
<b>Organisation/ person making representation:</b>	[redacted]
<b>Name of site:</b>	Not specified
<b>Report map reference:</b>	Directions maps SCS6C & 6D
<b>Route sections on or adjacent to the land:</b>	SCS-6-S012 to S033 & SCS-6-S055 to S063
<b>Other reports within stretch to which this representation also relates</b>	
<b>Summary of representation:</b>	
The representation disagrees with Natural England's proposals to exclude access to parts of the foreshore, under s25A. It goes on to advise that the base mapping used in Natural England's reports is inaccurate and out of date.	
<b>Natural England's comment:</b>	
Natural England took advice from key bodies, including HM Coastguard and the RNLI, when considering where it might be necessary to exclude access on grounds of suitability, under s25A. We acknowledge that the area is popular with local people, but are obliged to consider new visitors from further afield, who are much less likely to	

have good local knowledge about the tides, presence of quicksand etc. The exclusion proposed relates solely to proposed new coastal access rights and does not affect any historic, permissive or private rights. We are aware that the OS base mapping does not reflect the situation on the ground; this is inevitable, given the constant change on many parts of the coast. Any such exclusions are mapped, as far as is possible, against recognisable features such as river channels - with the expectation that visitors will recognise those features as boundaries, even if they have subsequently migrated.

**Relevant appended documents (see Section 5):**

None

<b>Representation ID:</b>	<b>MCA/SCS6/R/16/3479</b>
<b>Organisation/ person making representation:</b>	[redacted]
<b>Name of site:</b>	Arnside to Silverdale
<b>Report map reference:</b>	Not specified
<b>Route sections on or adjacent to the land:</b>	Not specified, but taken to be SCS-6-S009 to SCS-6-S063
<b>Other reports within stretch to which this representation also relates</b>	
<b>Summary of representation:</b>	
The representation requests that the ECP route be made as accessible as possible, for elderly and less mobile members of the public. It includes examples of the sorts of barriers to accessibility that are faced by people in these categories.	
<b>Natural England's comment:</b>	
Natural England is grateful for the information supplied. We can confirm that we will take all reasonable steps to ensure that the path is as accessible as possible, with the aim that the only barriers to access are those associated with the terrain and other natural features. We will further consider these aspects of the project as we start to plan the establishment works associated with the path. We expect Cumbria County Council, as access authority, to follow all relevant best practice and adhere to relevant legislation, when carrying out the establishment works.	
<b>Relevant appended documents (see Section 5):</b>	
None	

<b>Representation ID:</b>	<b>MCA/SCS6/R/17/3328</b>
<b>Organisation/ person making representation:</b>	Arnside & Silverdale AONB – [redacted]
<b>Name of site:</b>	All land within AONB
<b>Report map reference:</b>	SCS6c to 6e
<b>Route sections on or adjacent to the land:</b>	Not specified, but taken to be SCS-6S009 to SCS-6-S063
<b>Other reports within stretch to which this representation also relates</b>	
<b>Summary of representation:</b>	
The representation firstly suggests that a continuous route around the upper Kent Estuary should be implemented. It goes on to include recommendations about signage, gates and path construction. Finally, it offers continued assistance and input from the AONB partnership.	
<b>Natural England's comment:</b>	
Natural England is very grateful for the input and advice from the AONB partnership. We will be pleased to continue discussions with officers of the AONB in the preparation for and during the establishment phase. Natural England acknowledges that a continuous walking route would have been preferable, all other factors taken into account. However, we believe that the proposed route, as far as the railway stations at Grange-over-Sands and Arnside, is entirely consistent with the advice in the approved Coastal Access Scheme.	
<b>Relevant appended documents (see Section 5):</b>	
Arnside & Silverdale AONB Management Plan 2019-24 (94 pages)	



**5. Supporting documents**

**MCA/SCS6/R/4/3455 - [redacted] – 2 photographs**









With reference to the reports SCS6: Silecroft to Silverdale and SDC1: Silverdale to Cleveleys. We are delighted that the coast path here is almost completed. However a few points could be improved.

SCS6 states that it has been decided that the coast path should stop at Grange over Sands and start again at Arnside because of the difficulty of the terrain on the north bank of the Kent Estuary to the east of Grange. It suggests that the train should be used. It would be equally sensible to use the good bus service from Grange to Heaves Hotel, Levens and then cross the Kent at Levens Hall and follow the minor road on the south bank of the Kent to Dallam Bridge, through Sandside and along the embankment to Arnside. It is a shame that this proposal has not been given more consideration.

A great deal of thought has obviously been given to the problems of erosion and how that might affect the coastal path over the coming years in both reports. No thought at all appears to have been given to accretion of land. This is especially relevant in the Morecambe Bay area where the changing course of the river Kent has led to a 70 year cycle of accretion and depletion. In 2005 the Kent hugged the shores of Silverdale and Arnside having washed away the huge expanse of salt washed turf that had been there for 50 years. This is no longer the case. The cycle has now reached the stage where the land is being accreted again. The coastline from Arnside to The Cove (SCS-6S001 to SCS-6S063) can be dangerous at the moment all the way along. However the spartina is starting to become established and over the next few years the turf should return. At that stage it may be safe to walk all the way around the coast. The same is true for the stretch from The Cove to Quakers Strang (SDC-1S001 to SDC-1S027). Obviously care will need to be taken at very high tides as on any shoreline but the maps used show a state of the river that may not occur again for another 60 years or so.

The maps show permanent access exclusion zones. There are 2 reasons given. One is for reasons of sensitive flora and fauna where the path could impact negatively on SSSI's and other designated areas (land management reasons). The second is because of concerns for public

safety. (marked as unsuitable for public access). Both of these are understandable but neither appears to have been used properly here.

Firstly exclusion for land management reasons,  
The exclusion zone shown in SCS 6A includes the field that has Spiked Speedwell growing. This is definitely an area that should not be open access.

However there are two other areas that should be marked. These are  
1: The area to either side of the public footpath across The Lots, SDC-1-S003. This is a site of national importance for both *Orchis morio* and *Spiranthes spiralis*, two of our rare native Orchids. Walking along the footpath will not cause any disturbance but walking nearer to the sea shore which would be a temptation could cause irreparable damage. The site is owned by The National Trust and is managed with great care by them. I can not see them being happy with this. Ideally the area to the seaward side of the path to the wall should be marked as an exclusion zone.

2: The area of Jack Scout Nature Reserve.  
Once again there is every reason why this should be marked as an exclusion zone. The flora and fauna are very special and the area provides the foodplants of several of our rarer butterflies.

SDC1A marks an area from the car park to Eric Morecambe hide for exclusion. If this is considered worthy of exclusion then the other 2 areas are of equal worth.

Secondly for reasons of safety.

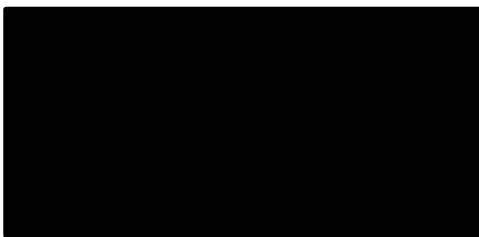
By marking a stretch as unsuitable because of its inherent danger you imply that other unmarked stretches are safe. By only marking SCS -6-S011 to SCS-6-S037 and a thin strip along the shore between the start of SCS-6-S053 to the end of SCS-6-S063 you imply that the sands to the seaward side of the path from SCS-6-37 to SCS-6-S053 are safe. This stretch is much more dangerous than the other two. None of it should be walked on without local knowledge and due care and attention. Again the maps SDC 1B and 1C show the coast from Cove Well to Quakers Strang. While the Coast Path goes inland across the Lots the actual map has no warning exclusion along the sea's edge and in fact a public footpath is shown there. This should be considered as dangerous at certain tides.

A better strategy would be to have signage showing any local dangers at the areas. This happens at the moment at Far Arnside as shown where the footpath is shown but the dangers are enumerated.



It is not sensible to make exclusion zones for safety reasons other than in exceptional circumstances.

With best wishes





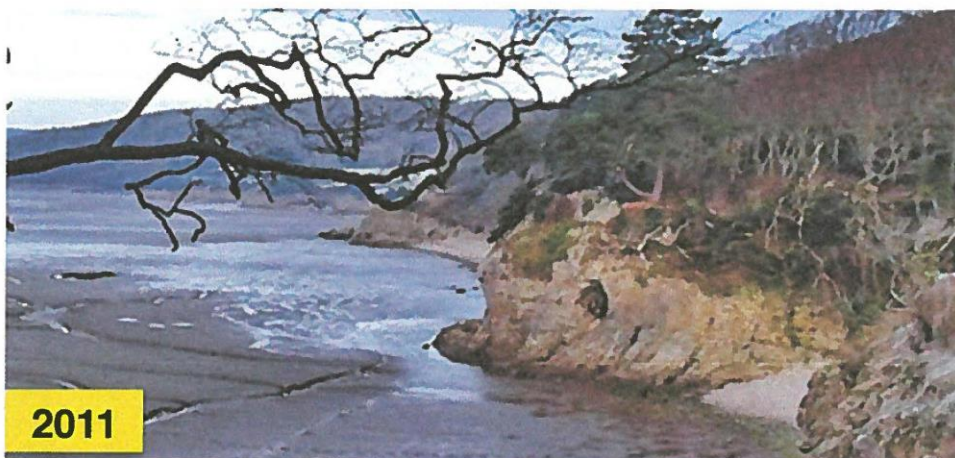
Photos From [redacted]

The following images show the view from The Cove to Far Arnside over the years.

Firstly the acres of Saltwashed turf from Silverdale to Arnside Point via The Cove during the 1960's to 1990s.

Secondly a close-up of the Kent channel at The Cove at low tide in 2011 showing how everything had been scoured away.

Thirdly the same section under 8 feet of mud and sand in 2020 which is gradually becoming incremented and consolidated.



## Silverdale Parish Council -- Coastal Footpath Representations

A	<p>The Parish Council understands that the foremost objective for creating the English Coastal Footpath is to help enhance the Health and Wellbeing of the 60+million residents of the UK and numerous visitors from overseas. It will achieve this by providing the opportunity for an exhilarating and uplifting outdoor experience by allowing users to walk in close proximity to the coast edge.</p>
B	<p>When determining a suitable route, the necessity to respect the privacy and security of domestic and most commercial premises is accepted and undoubted. As is the need to achieve a reasonable balance between public access and the landowner's interests where the route has no adequate alternative but to pass through areas such as farmland, forestry, nature conservation sites etc</p>
C	<p>The Council wishes to raise concern about the arrangements for, and involvement of, local organisations in the creation of the route. It is noted that in this area, Natural England chose to involve the Arnside and Silverdale AONB unit, the RSPB, the National Trust and others, but chose not to involve the local community as represented by Parish Council, the local Ramblers groups, or another organisations.</p> <p>Since the local community will be one of the biggest users of the pathway and can bring a wealth of local knowledge to the process, this is considered to be both a failure of the process and somewhat disrespectful.</p> <p>The decision to not involve the Parish Council is particularly an issue because at the Council's 2017 Annual Parish Meeting, Natural England was invited to give a presentation on the position at that early stage of development. The request for Parish Council involvement was raised with the presenters and a commitment received that this would be fed back. Despite several enquiries by the Council in the intervening period, no such involvement was made. This is most disappointing.</p> <p>The opportunity to bring into consideration the communities' views in forming the draft plan has been missed and is considered to be a failure of the establishment process. Although the opportunity is available now to make representations, it is widely recognised in project management that changes later in the process add time and cost – groundwork has been done, the report and route and its justifications been drafted and there is inevitably a reluctance to change.</p> <p>The Council therefore requests that the following points, are given substantial consideration in the review of the draft proposals</p>
1	<p>The Council supports the proposed route and associated arrangements for sections SDC-1-S001 to SDC-1-S003 between Cove Well and the junction with Stankelt Road.</p>
2	<p>The Council supports the route proposal for Section SDC-1-S004 along the public highway known as "The Shore". It is however suggested that some markings outside the frontage of</p>

	<p>the Silverdale Hotel would be advisable to denote the footway in front of the Hotel and help guide vehicle owners that this should be left clear for pedestrians.</p>
3a	<p>The Council understands Natural England's proposals for the Coastal Path between the end of Shore Road and the National Trust Site at Jack Scout. However it has a number of significant concerns regarding section SDC-1-S005 to section SDC-1-S020, which take the proposed route of the Coastal Path from the end of the public highway at "The Shore" cattle grid, onto the foreshore, around the Know Hill headland until it reaches the National Trust site of Jack Scout.</p>
3b	<p>The initial sections, SDC-1-S006 to SDC-1-S008, covering a distance of approximately 570m, are along the saltmarsh foreshore and over limestone outcrops and small cliffs. They are subject to regular immersion during Spring Tides and are also subject to the natural, well documented, vagaries of erosion and accretion of the Morecambe Bay saltmarsh, which can cause areas of this saltmarsh to be unusable/impassable by walkers for long periods, in some cases for a number of years.</p> <p>Additional to these existing issues, there is need to take into consideration the large body of scientific opinion indicating sea levels are rising quite markedly and rapidly. This will exacerbate the situation.</p>
3c	<p>During a meeting in Silverdale on February 4<sup>th</sup> this year with [REDACTED] and [REDACTED] Natural England it was explained that, for the sections intended to run outside the field boundary, it was planned to try to cut into the limestone cliff in order to form a ledge for the proposed coastal path route. Because access with machinery was considered to be difficult or impracticable, they expected this work would have to be carried out by hand with the limitations this would likely bring.</p> <p>The Council representatives asked how likely it would be that a pathway suitable for most users could be formed on the narrow cliff edge in this manner. The reply was interpreted to contain quite some uncertainty as to how successful this work would be. It was summarised that if such a path ledge were to be possible, it would only be suitable for confident walkers, probably without accompanying young children or dogs and when weather conditions were reasonably benign.</p> <p>The Council does not therefore consider the proposal to cut ledges into the cliff to be a safe or satisfactory or a robust solution and therefore believes it would not adequately comply with the objectives set out for the English Coastal Footpath. The risk of accident is pre-emptible, the likelihood of occurrence considered high and the consequences potentially severe.</p>
3d	<p>The Council therefore requests that Natural England considers the following in connection with the Shore Road to Jack Scout Path.</p> <ol style="list-style-type: none"> <li>1. Has a full risk analysis been undertaken by Natural England for this section? Please confirm and supply details of this risk assessment.</li> <li>2. In some sections the proposed route can be hazardous, in some circumstances dangerous.</li> </ol>



4	<p>An optional bypass route, using Lindeth Road, as an alternative to sections SDC-1-S004 to SDC-1-S020 of the proposed coast edge path, is suggested in the report. This lies along a tarmac highway for a distance of 2/3 mile, set inland from the coast edge by up to 0.4 mile, such that sight and sound of the coast edge is completely lost. The Council considers this to be a very poor alternative to a coast edge route and requests that further efforts be made to develop a robust solution to the coast edge route, that will be:</p> <ul style="list-style-type: none"> <li>a) Available at all states of the Tide</li> <li>b) Usable safely and reliably by groups of family walkers and those who may have some mobility limitations</li> <li>c) Available when the well-known natural periodic accretion and erosion of the sands causes the foreshore to be un-walkable.</li> </ul>
5	<p>The Council supports the route proposal for sections SDC-1-S021 and SDC-1-S022, around the National Trust headland of Jack Scout and, along the public highway to [REDACTED]</p>
6	<p>The Council supports the route proposal around [REDACTED] as indicated by sections SDC-1-S023 to SDC-1-S027.</p> <p>Mention is made in the report that the option of a route passing to the coastal side of Brown's Houses, was considered. This route has recently been determined at Appeal to be a public ROW and is now signposted and open for use. This option would also be supported by the Council as either the prime, or an alternative route, around Brown's Houses.</p>
7	<p>The Council supports the route proposal for sections SDC-1-S028 and SDC-1-S029.</p> <p>It is noted that new steps are proposed on the incline on section SDC-1-S029. This is considered very important to usability and should include the whole length of the incline</p>

	<p>because this section of path, which has a clay surface, becomes very slippery and difficult to use in damp or wet conditions.</p>
8	<p>The Council supports the route proposal for Sections SDC-1-S030 to SDC-1-S034, at which point the Silverdale Parish boundary at Quaker's Stang is reached.</p> <p>It is noted that where the proposed route passes beneath the Railway Line on Section SDC-1-S033 there is a depression across the whole width of the surface, perhaps engineered to allow more headroom for vehicles to pass underneath. This regularly collects rainwater runoff and can be flooded to a depth of 250mm. There is no available bypass route for pedestrians because of the tight fencing and a water course running alongside. Clearly, this is not satisfactory and a suitable, robust drainage, pedestrian ledge, or other solution, will be necessary to maintain usability of the route.</p>
9	<p>In the Draft Report, Natural England has included a 'proposed long-term access exclusion zone' located on the foreshore, shown on map SDC 18, extending from "The Dip" (located between Priory Cottage and the Holiday Camp) and Red Rake.</p> <p>From the discussions held at the previously mentioned meeting in Silverdale on February 4<sup>th</sup> this year, it is now clear that the statement "long term access zone" is misleading.</p> <p>The Council now understands that whilst NE do not wish to formally promote access in the exclusion zone, they expect and intend the public will continue to enjoy existing established access subject only to observing the need for care. In other words, in their view no physical change from the current established access arrangements.</p> <p>For several generations, probably since the saltmarsh re-established in this part of the Bay in the 1920's, the general public has enjoyed, without let or hindrance in any form whatsoever, freedom to roam on this area of land. The historical rights to do so have become well established. This can be evidenced by inspection of the many historical photographs and reports that exist showing such uses. There are many Witnesses available in Silverdale to testify to this. The Council on behalf of all members of the community and general public asserts the right that this should continue without any hindrance.</p> <p>Natural England explained that the intention to prohibit access for walkers was in part due to the reported current unsuitability due to soft or sinking sands. This state may perhaps apply at the present time but it is a transient situation and just two years ago the area was a wide channel/tidal lagoon, used regularly by bathers and canoers. The state of the sands has almost certainly changed since the report was drafted and will continually do so.</p> <p>If this area is thought to be a hazard such as to require notification and warnings to potential users then a suitable temporary warning system for the whole area should be implemented.</p> <p>Prior to the recent phase of saltmarsh erosion which commenced in the 1980's, this area consisted of a very stable, short grass/turf area, interspersed with numerous pools filled with sea water. It provided an opportunity to walk from The Cove or The Dip directly out to the saltmarsh edge and onwards to the river Kent channel. Others used the saltmarsh to</p>

<p>walk directly to Arnside Point or wander freely and at random, perhaps to emerge at other locations such as The Shore car park below the Silverdale Hotel.</p> <p>It is clear that a period of saltmarsh accretion is currently taking place and there are signs of early stage grasses establishing. If, as expected, this continues, a tough grass covering of the marsh will develop quite rapidly, as it has at Grange over Sands, and the opportunity for the public to wander freely, as before, will be available again. The Council looks forward to this happening without the insinuation of “trespass”</p> <p>The defined area intended for prohibition of access requires comment. It is of non-geometric shape and does not follow any physical or visible landform on the ground. It might on original draft been intended to follow something that was evident at the time, but as previously described, the transient state of the saltmarsh may have removed such features. This will cause considerable difficulty for any member of the public in trying to identify the area of “Prohibition”. Therefore, it is considered to be impracticable for any user to identify and respect such a zone .</p> <p>In summary, the Council objects most emphatically to the establishment of any ‘proposed long-term access exclusion zone(s)’ on the foreshore at any point between Arnside and Brown’s Houses.</p>
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Chairman, Silverdale Parish Council

March 03, 2020

**MCA/SCS6/R/17/3328 Arnside & Silverdale AONB – [redacted]**  
Arnside & Silverdale AONB Management Plan 2019-24

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