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# Proposed changes to the King Charles III England Coast Path at **Dunnerholme, Askam-in-Furness, Cumbria**

Natural England's Variation Report to the Secretary of State

Coastal Access Variation Report SCS-VR18  
17<sup>th</sup> July 2024



## 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.

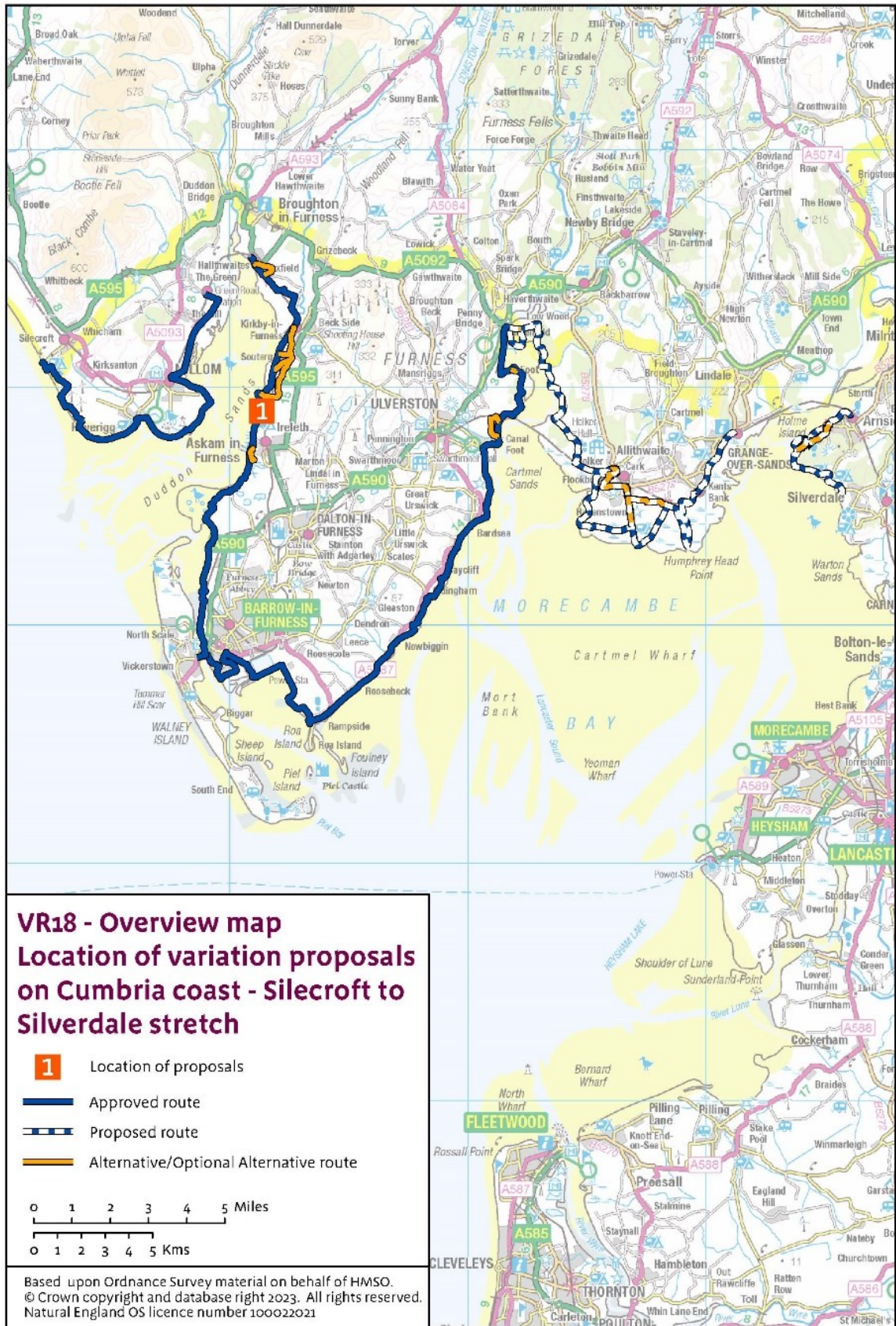
1.2 On 20<sup>th</sup> October 2022, the Secretary of State approved Natural England’s proposals relating to the coast between Green Road station and Greenodd, Cumbria, which formed part of our proposals for the Silecroft to Silverdale stretch [<https://www.gov.uk/government/publications/england-coast-path-from-silecroft-to-silverdale-comment-on-proposals>]. Whilst the proposals have been approved, Natural England and Westmorland and Furness 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 a change is necessary to the route of the King Charles III England Coast Path (KCIIIIECP). This report contains Natural England’s proposals relating to a change at Dunnerholme Golf Course, 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/854814/silecroft-silverdale-overview.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/854814/silecroft-silverdale-overview.pdf) provides vital context to the proposal set out in this Variation Report.



## Part 2: Proposed variation at Dunnerholme Golf Club

<b>Start Point:</b>	<b>Grid reference: SD 2126 7955</b>
<b>End Point:</b>	<b>Grid reference: SD 2136 7881</b>
<b>Relevant Maps:</b>	<b>GAL VR18a</b>

### 2.1 Introduction

#### Reason for variation:

2.1.1 Natural England's original proposals for the coast between Silecroft and Silverdale were published in January 2020.

At the time, our discussions with landowners and conservation advisers led to the proposal of the King Charles III England Coast Path (KCIIECP) on a regularly used, de facto walked line at the landward edge of the foreshore, below a bank which held a parallel de facto walked line, in the interests of fair balance. In 2022, Westmorland and Furness Council, previously Cumbria County Council, worked with the landowners on a change to the Public Rights of Way (PRoW) network in the area, with the main public footpath route now aligned on the higher banking behind the foreshore.

We therefore intend to vary the route of the approved King Charles III England Coast Path to follow the same alignment on the ground as the new PRoW, to improve clarity for walkers and minimise any impacts locally.

The area sits within a number of protected sites, as detailed below, and hosts a number of individually protected species. Conservation works to establish scrapes (small wet areas/ponds) benefitting natterjack toads and wading birds have now increased the potential of this section of foreshore to host more sensitive wildlife. The new line of the public footpath has additional vegetation, screening parts of the foreshore from access by dogs, and preventing 'skylining', where wildlife can be startled by walkers and dogs silhouetted against the sky above them; yet it does not detract from the coastal experience for the walker.

We therefore concluded that the proposed variation also achieves the most environmentally responsible solution.

#### Proposed variation:

2.1.2 The approved route of the KCIIECP follows an existing walked line at the back of the foreshore saltmarsh area, between Dunnerholme Rock and Marsh Farm Caravan Park in Askam-in-Furness. See section SCS-2-S037 (and map SCS2e) in Report 2 of the original Silecroft to Silverdale proposals.

2.1.3 The proposed variation would involve the realignment of the KCIIECP onto the realigned public footpath, a short distance to the landward side.

2.1.4 The entirety of the realigned KCIIECP falls within the previously approved extent of default landward coastal margin and, as such, no changes are made to the coastal margin as part of this Variation Report.

2.1.5 We believe that the route changes would not in any way reduce the enjoyability of this part of the KCIIECP and will contribute to its accessibility as the proposed variation would follow a line with less need for infrastructure and less tidal inundation.

## Considering the options:

2.1.6 We have worked with the access authority and landowners in the development of this proposal, taking into account updated land management priorities as part of their public footpath realignment discussions.

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

- We considered retaining the approved line of section SCS-2-S037 of the King Charles III England Coast Path; either in parallel with the proposed new public footpath, or with the public footpath proposal amended to coincide with the approved KCIIECP. However, for reasons given above, the most convenient and environmentally sustainable route, given updated priorities of land managers and conservation objectives, is for the two routes to be coaligned on the banking, as proposed in this Variation Report.

## 2.2 Proposals Narrative

### The Trail:

2.2.1 The proposed variation to the approved trail (from north to south):

- Would follow the same route down from Dunnerholme Rock as in the approved proposals, but would then cut through a short section of dune to meet the newly realigned public footpath, a few metres landward of the currently approved KCIIECP route, before turning slightly seawards to rejoin the approved route just north of Marsh Farm Caravan Park.
- Includes four sections of new path.
- Follows the coastline as closely as is possible in this area; retains views of the sea in many places, often improved due to slight rise in elevation and with additional views inland; and offers a drier, more accessible line for path users.
- Extends for a length of 785 metres at a maximum of 47 metres east of the approved route.

Map VR18a 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 sections of trail affected by this variation pass between areas of dune, saltmarsh, scrub vegetation and golf course, and falls entirely within national and international designated sites.

2.2.4 The following designated sites affect this length of coast:

- Morecambe Bay and Duddon Estuary Special Protection Area (SPA)
- Duddon Estuary Ramsar site
- Duddon Estuary Site of Special Scientific Interest (SSSI)

Map VR18b - Key Statutory Environmental Designations - shows the extent of these designated sites in relation to the proposal.

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

### **Accessibility:**

2.2.6 The new trail sections will have a natural grass or sand surface, but are step-free and remove the need for physical infrastructure such as bridges. They sit on a drier line, safer from tidal inundation. This creates a more accessible route than the previously approved option. However, some parts of the route may remain difficult for people with reduced mobility, due to natural features.

### **Where we have proposed exercising statutory discretions:**

2.2.7 **Landward boundary of the coastal margin:** We have not used our statutory discretion in this location. The landward coastal margin coincides with the edge of the dune, which is a default coastal land type.

**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.**

2.2.8 **Restrictions and/or exclusions:** There are no restrictions or exclusions proposed as part of this variation report. Any national coastal access restrictions will apply, as detailed in Annex D of the 2020 Overview.

2.2.9 **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.

2.2.10 Column 4 of table 2.3.1 indicates where the roll-back power has been proposed in relation to a newly proposed route section. In relation to sections SCS-VR18-S001 to SCS-VR18-S004, the route, as initially determined at the time this report was prepared, is to be at the centre of the line shown on map VR18a as the proposed route of the trail.

2.2.11 If at any time in the future any part of this 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 7 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:

2.2.12 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.

2.2.13 There will be a small reduction in costs for this section. The impact on the overall establishment cost for the Silecroft to Silverdale report is negligible. These estimates are informed by information already held by the access authority.

2.2.14 There are 2 main elements to the overall capital costs:

- Path clearance
- Waymarking

2.2.15 If the Secretary of State approves our report, Westmorland and Furness Council will liaise with the affected landowners and occupiers about relevant aspects of the establishment works. 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:

2.2.16 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 the 2020 Overview for guidance on reading and understanding the tables below.

### Table 2.3.1: Map VR18a - Dunnerholme Golf Club

Key notes on table:

1. 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.
2. 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 2020 Overview) is shown in this column where appropriate. “No” means none present on this route section.
3. 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
<b>Map(s)</b>	<b>New route section number(s)</b>	<b>Current status of route section(s)</b>	<b>Roll-back proposed?</b> (See part 7 of 2020 report Overview)	<b>Landward margin contains coastal land type?</b>	<b>Proposal to specify landward boundary of margin</b>	<b>Reason for landward boundary proposal</b>
VR18a	SCS-VR18-S001	Other existing walked route	Yes – see table 2.3.2	Yes – dune		
VR18a	SCS-VR18-S002	Not an existing walked route	Yes – see table 2.3.2	Yes – dune		
VR18a	SCS-VR18-S003	Public footpath	Yes – see table 2.3.2	Yes – dune		
VR18a	SCS-VR18-S004	Other existing walked route	Yes – see table 2.3.2	Yes – dune		

### 2.3.2 Roll-back implementation – more complex situations: Map VR18a - Dunnerholme Golf Club

Map(s)	New route section number(s)	Feature(s) or site(s) potentially affected	Our likely approach to roll-back
VR18a	SCS-VR18-S001 to SCS-VR18-S004	<ul style="list-style-type: none"> <li>■ Morecambe Bay and Duddon Estuary SPA</li> <li>■ Duddon Estuary Ramsar site</li> <li>■ Duddon Estuary SSSI</li> <li>■ Dunnerholme Golf Club</li> </ul>	<ul style="list-style-type: none"> <li>■ If the existing route is no longer viable through or in close vicinity of a designated site (e.g. SSSI, SAC, SPA) 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 or in close vicinity to the site, if appropriate or (b) if necessary, be routed landward of it. Possible impacts on designated sites 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.</li> </ul>



Map(s)	New route section number(s)	Feature(s) or site(s) potentially affected	Our likely approach to roll-back
			<ul style="list-style-type: none"> <li>■ If it is no longer possible to find a viable route seaward of the golf course, or other areas of excepted land, we will choose a route landward of it or utilising existing rights of way, following discussions with owners and occupiers.</li> </ul> <p>In reaching all of the above judgements we will have full regard to the need to seek a fair balance between the interests of potentially affected owners and occupiers and those of the public.</p>

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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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