



Coastal Access Modification Report SCS MR1

Proposed changes to the submitted King Charles III England Coast Path proposals for Silecroft to Silverdale

Location affected: Abbot Hall, Kents Bank, Cumbria

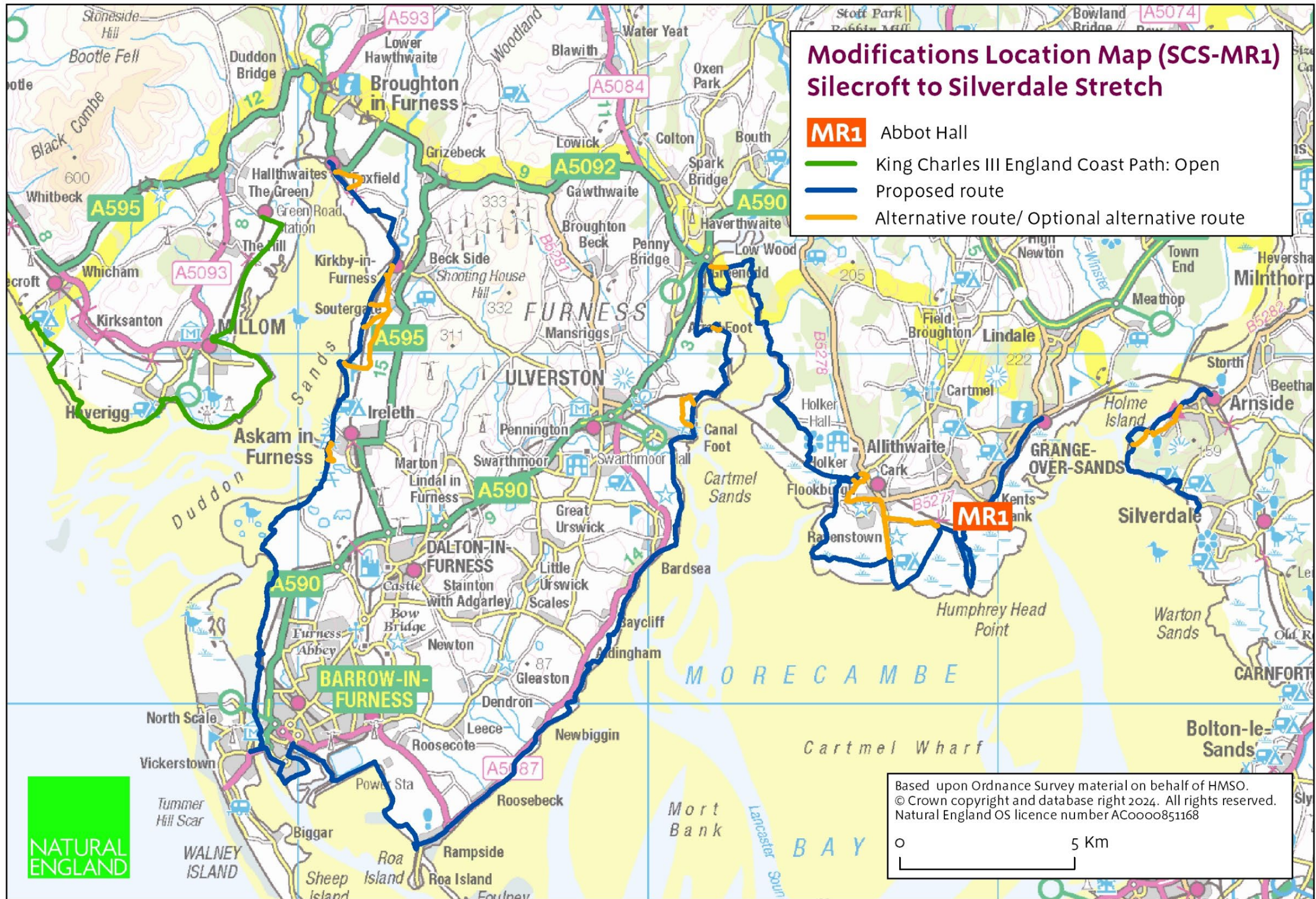
Natural England's Modification Report to the Secretary of State

March 2025

Purpose of this report

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.
2. On 8th January 2020, Natural England submitted a compendium of reports to the Secretary of State for the Environment, Food and Rural Affairs, setting out proposals for improved access to the coast from Silecroft to Silverdale, Cumbria. Whilst parts of the stretch are now approved and open to walkers, the Secretary of State is considering several related objections and representations before determining Natural England's remaining reports. Public rights of access to this length of coast therefore have yet to commence.
4. Since submission of its report for SCS5 (Greenodd footbridge to Kents Bank), it has become clear to Natural England that, because of altered circumstances, a number of changes are necessary to the route it proposed for the England Coast Path on this length of coast.
5. Most of these changes can, in Natural England's view, be effected through the Secretary of State's determination of representations and objections that have already been received. However, one of the changes that are now considered necessary cannot be dealt with in this way and needs to be proposed now through a separate Modification Report (MR), so that it can be considered alongside the rest of Natural England's original proposals. The proposed change is at the location shown on the Ordnance Survey base map below headed Modifications Location Map.
6. This changed proposal is set out below and is subject to a fresh objections and representations process; to advice by a person appointed by the Secretary of State about any objections that are received to the proposals; and then to determination by the Secretary of State alongside Natural England's original proposals.
7. It is therefore recommended that for determination purposes, Natural England's original report relating to this length, which can be viewed [here](https://www.gov.uk/government/publications/england-coast-path-from-silecroft-to-silverdale-comment-on-proposals) [https://www.gov.uk/government/publications/england-coast-path-from-silecroft-to-silverdale-comment-on-proposals], should be read as proposed to be amended by this MR. The original stretch [Overview](#)

[<https://assets.publishing.service.gov.uk/media/5e00e2f8e5274a33c5aaa376/silecroft-silverdale-overview.pdf>] provides vital context to many of the issues discussed within this MR.



Part A: Proposed modification at Abbot Hall

Start Point:	Grid reference: SD 3936 7516
End Point:	Grid reference: SD 3966 7564
Relevant Map:	SCS 5I
Section numbers from original proposals no longer being proposed: SCS-5-S087 to SCS-5-S092 (and part of SCS-5-S086)	

A.1 Introduction

Reason for and consequences of proposed modification:

A.1.1 Our original alignment of the ECP in this area, as proposed in Natural England's original [report](#), followed a new route through woodland on the eastern side of Kirkhead, before connecting with Kents Bank station via land between Abbot Hall and the railway.

A.1.2 Following a change in ownership of Abbot Hall and the surrounding land, it is apparent to Natural England that the previously proposed route for the trail is no longer compatible with future land use and management.

A.2 Proposals Narrative

The Trail:

A.2.1 Our proposal (see map MR1a) is, from west to east, to re-route the path shown as the eastern end of SCS-5-S086 and SCS-5-S087 to SCS-5-S092 in our original report. The realigned trail would extend for a length of approximately 975 metres, at a maximum of 230 metres north-westward of the original route proposed.

A.2.2 The modified trail would follow an existing rough track over Kirkhead, generally northwards, before crossing the upper part of a field northwest of Abbot Hall and entering smaller blocks of woodland between Abbot Hall and Kirkhead Road. It would then follow a roadside pavement in a southeasterly direction, joining with the originally proposed route at Kents Bank station.

Protection of the environment:

A.2.3 The modified route passes through or close to the following protected areas:

- Duddon Estuary and Morecambe Bay Special Protection Area/Ramsar site: The modified route would be close to, but entirely outside of the boundary of these protected sites.
- Morecambe Bay Special Area of Conservation: As above.
- Morecambe Bay Site of Special Scientific Interest. As above, the modified route would be close to, but entirely outside the boundary of this protected site.
- The modified route would take walkers further away from these protected sites, whilst providing more elevated views out to the estuary in places.

- Kirkhead Limestone Pavement Order area: The modified route would remain with the boundaries of this area for a greater distance than was the case with the original proposals. However, little limestone is exposed along the proposed route, and no establishment works are intended that would have any impact on the protected limestone, either exposed or buried. Any directional signage required will be carefully sited in deeper soils.

Refer to 'Key Statutory Environmental Designations' maps below – SCS-MR1b

A.2.4 Natural England is therefore satisfied that modifying its proposals in the way described in this report will not lead to them having an adverse effect on the site integrity of the Morecambe Bay and Duddon Estuary Special Protection Area/Ramsar site, and is fully compatible with conservation of the Kirkhead Limestone Protection Order area and Morecambe Bay Site of Special Scientific Interest.

Accessibility:

A.2.5 Whilst the modified route rises to a greater elevation than would have been the case with the original proposals, it does so over more gentle slopes throughout. In particular, the slopes on the eastern side of Kirkhead, across which the originally proposed route would have passed, may have been difficult for some people with reduced mobility.

Minor surfacing work would be undertaken in a few key locations, on the modified route, to improve accessibility.

As is often the case in areas overlying limestone geology, clay soils in this area – particularly over Kirkhead itself – can become slippery underfoot when wet.

Where we have proposed exercising statutory discretions:

Landward boundary of the coastal margin:

A.2.6 The original proposals did not include any additional landward margin. Generally, the landward edge of the coastal margin was either default or slightly reduced, to coincide with a particular feature.

A.2.7 The modified proposals similarly do not include any additional landward margin. The landward boundary of the coastal margin would be the landward edge of the track over Kirkhead and the landward edge of the pavement alongside Kirkhead Road. Elsewhere, it would be the default.

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.

Restrictions and/or exclusions:

A.2.8 Access rights to the seaward margin would be subject to the excepted land rules and the national restrictions on coastal access rights.

A.2.9 As with the original proposals, new access rights would be excluded from the overwhelming majority of the coastal margin, seawards of the coastal railway line, under s25A of the Countryside and Rights of Way Act 2000 (saltmarsh or flat, unsuitable for public access). The local exceptions to this are shown on map SCS-MR1c.

No additional exclusions or restrictions are proposed in relation to the modified trail or the area of coastal margin landwards of the railway.

Coastal erosion:

A.2.10 Part 7 of the Overview to the original stretch report explains that Natural England can propose that the route of the trail should be able to change in the future, without further approval from the Secretary of State, in response to coastal change, and the proposals in this respect are then set out in that report/those reports.

A.2.11 We have chosen not to make any additional roll-back proposals in this modification report. Accordingly, the route is to be at the centre of the line shown on map SCS-MR1a as the proposed modified route of the trail.

Establishment of the trail:

A.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.

A.2.13 Our estimate of the capital costs for these works is **£7,300**. This is a decrease of around £23,115 compared to the original route set out in our report to the Secretary of State on 8th January 2020. This is mainly due to the easier terrain to be crossed by the proposed modified route, and the more gentle gradients involved.

A.2.14 Summary of cost implications:

- Original cost estimate for establishment of submitted route (sections SCS-5-S086 to S092) = **£30,415**
- Cost estimate for establishment of proposed modified route = **£7,300**
- Likely saving = **£23,115**

A.2.15 These estimates are informed by information from the access authority (Westmorland & Furness Council).

A.2.16 There are four main elements to the overall capital costs:

- Vegetation clearance, at various points along the proposed route;
- Surfacing, installation of steps and creation of a path;
- Installation of new pedestrian gates and provision of gaps in walls; and
- Installation of directional signage.

A.2.17 If the Secretary of State approves our report, Westmorland & Furness 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:

A.2.18 As for the previously proposed route, ongoing maintenance of the trail would be necessary from time to time. This modification would make no significant change to our overall estimate for the originally submitted route, as set out in our report to the Secretary of State on 8th January 2020.

Part A.3: Proposals Tables

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

Table A.3.1: Map SCS-MR1a – Kirkhead to Kents Bank

Key notes on table:

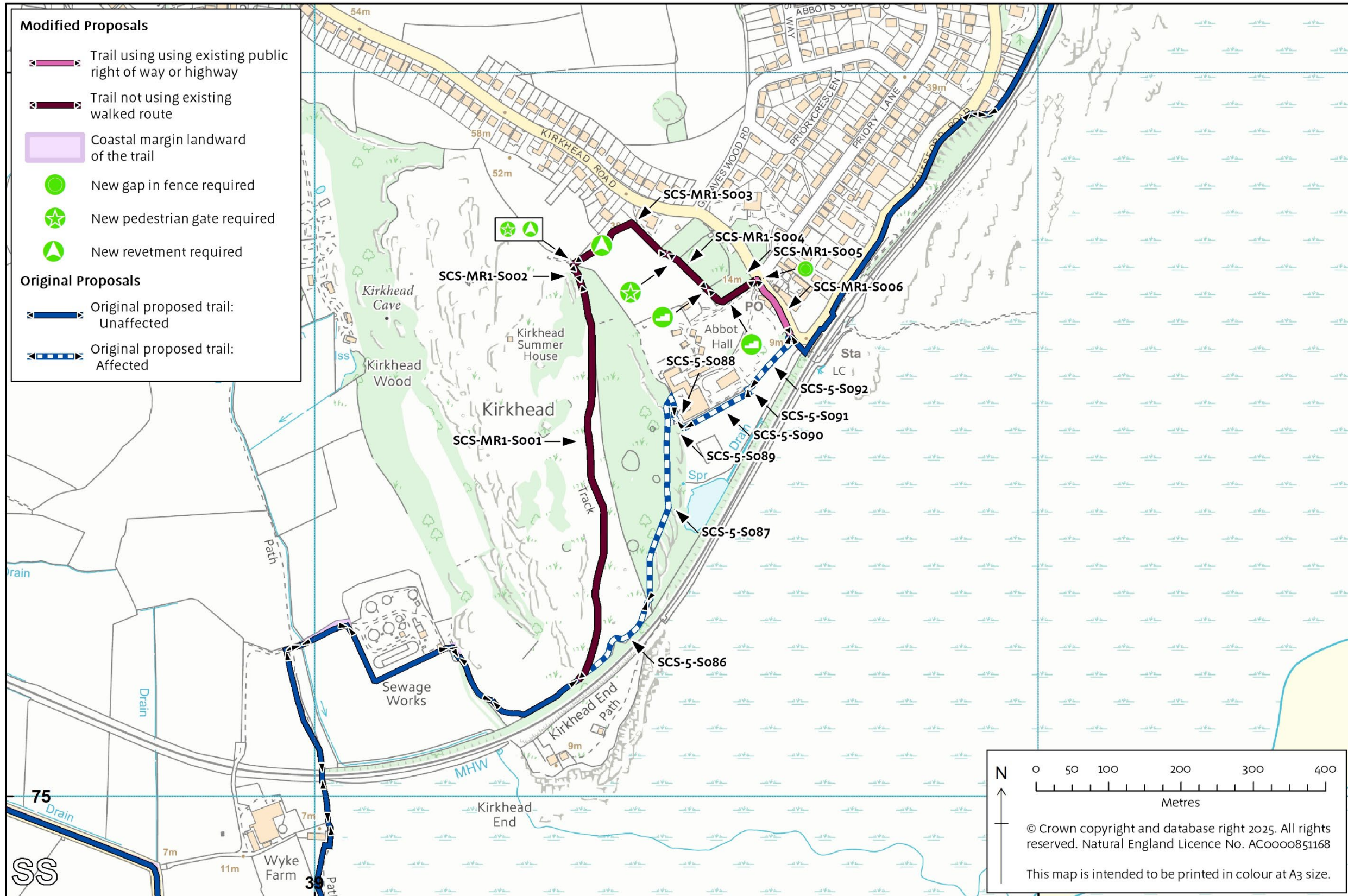
1. Column 4 – ‘No’ means no roll-back is proposed for this route section.
2. Column 5a - Certain coastal land types are included automatically in the coastal margin where they fall landward of the trail if they touch it at some point. The relevant land type (foreshore, cliff, bank, barrier, dune, beach, flat or section 15 land – see Glossary in Annex B to the 2017 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	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
SCS-MR1a	SCS-MR1-S001 & S002	Not an existing walked route	No	No	Landward edge of track	Clarity and cohesion	
SCS-MR1a	SCS-MR1-S003 to S005	Not an existing walked route	No	No			
SCS-MR1a	SCS-MR1-S006	Pavement	No	No	Landward edge of pavement	Clarity and cohesion	

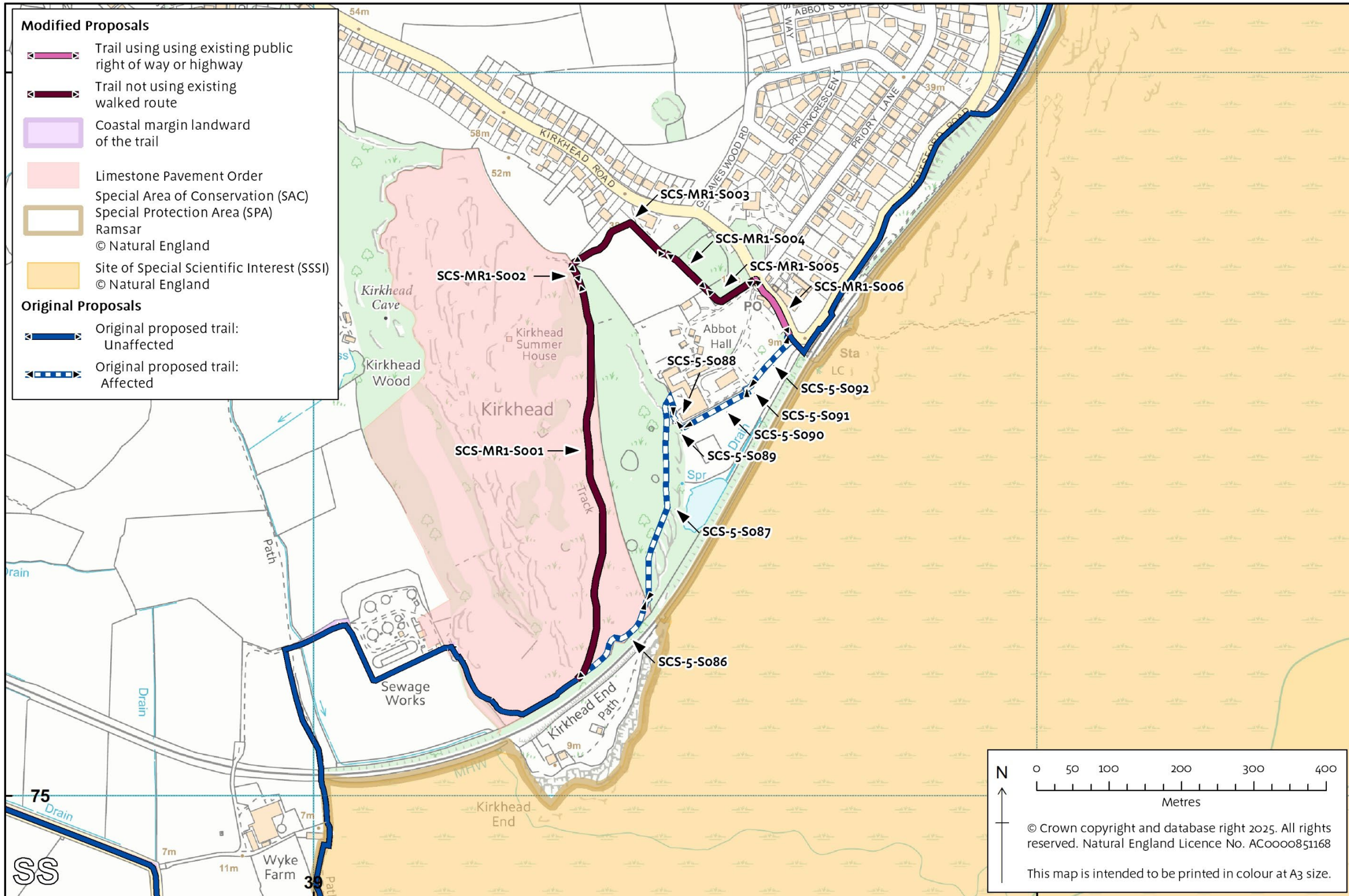
A.3.2 Other options considered: Map SCS-MR1a - Kirkhead to Kents Bank

Map(s)	New route section numbers(s)	Other option(s) considered	Reasons for not proposing this option
SCS-MR1a	SCS-MR1-S003 to S005 inclusive	We considered continuing the path some 150m further north, over Kirkhead, before crossing fields to join Kirkhead Road.	<p>We opted for the proposed route because:</p> <ul style="list-style-type: none"> ■ it is closer to the sea and maintains views of the sea; and ■ there is no roadside pavement on either side of Kirkhead Road, for part of the distance that would be involved, if we had taken forwards this option. Sight-lines are limited in places, on the roadside. ■ We therefore concluded that, overall, the proposed route struck the best balance in terms of the criteria described in chapter 4 of the Coastal Access Scheme
SCS-MR1a	SCS-MR1-S001 to S006 inclusive SCS-5-S080 to S086 inclusive	We considered following an informal path, on the seaward side of the railway, from Wyke Farm, around Kirkhead End, to Kents Bank station.	<p>We opted for the proposed route because:</p> <ul style="list-style-type: none"> ■ although further from the sea, this route provides stunning views over the marsh and estuary, from some points; ■ the marsh is frequently flooded, on incoming tides, up to the base of the railway embankment; ■ there is no readily available optional alternative route, for walkers to use when any such main route might be impacted by high tides; and ■ establishment works would be required, including small bridges, in order to make this route safe and enjoyable for all. Any such infrastructure would be susceptible to damage by high tides etc. ■ We therefore concluded that, overall, the proposed route struck the best balance in terms of the criteria described in chapter 4 of the Coastal Access Scheme.

Map SCS - MR1a - Abbot Hall



Map SCS - MR1b - Abbot Hall - Key Statutory Environmental Designations



Map SCS - MR1b - Abbot Hall - Key Statutory Environmental Designations

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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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