

Coastal Access – Gretna to Allonby



Representations on GAL MR3 (Longcroft/Whitrigg) and Natural England's comments

January 2025

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1. Introduction

This document details representations we have received on the stated coastal access report. These normally 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).

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

2. Background

Natural England's original report, setting out its proposals for improved access to the coast from Gretna to Allonby was submitted to the Secretary of State on 25th July 2016. Subsequently, a modification report (GAL MR3) was published on 14th August 2024, setting out changes to the original proposals in the vicinity of Longcroft and Whitrigg, Anthorn, Cumbria. This began an eight-week period during which representations and objections about that modification report could be made.

In relation to the report GAL MR3, Natural England received 1 representation, made on behalf of organisations 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. This 'full' representation is reproduced in Section 3 of this document together with Natural England's comments where relevant.

No representations were received from other individuals or organisations, referred to as ‘other’ representations.

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

Representation number:	MCA/GAL/MR3/R/1/0020
Organisation/ person making representation:	[redacted] (The Ramblers and Open Spaces Society)
Route section(s) specific to this representation:	Described on the representation form as relating to GAL-3-S033 to S036, but assumed to actually relate to GAL-MR3-S001 to S004
Other reports within stretch to which this representation also relates:	N/A
Representation in full	
THIS REPRESENTATION, MADE OF BEHALF OF THE RAMBLERS AND THE OPEN SPACES SOCIETY, SEEKS TO HAVE THE CURRENTLY PROPOSED MODIFICATION REJECTED AS IT IS NOT IN THE INTEREST OF PATH USERS AND SIGNIFICANTLY FAILS TO STRIKE A FAIR BALANCE AS REQUIRED. BOTH ORGANISATIONS ATTENDED THE PUBLIC INQUIRY IN NOVEMBER, 2017 TO THE ORIGINAL ROUTE PROPOSAL IN SUPPORT OF NATURAL ENGLAND AND URGED CONFIRMATION OF THE PROPOSED ROUTE. WE GAVE THIS SUPPORT DESPITE OUR PREFERRED ROUTE BEING ALONG THE FIELD EDGES IMMEDIATELY NORTH OF THE PROPOSED ROUTE GAL-3- S033 TO S036. WE DID SO BECAUSE OF OUR SIGNIFICANT CONCERNS ABOUT POTENTIAL CONFLICT OF USERS ON THE ADJACENT HIGHWAY - THE ROUTE THE OBJECTORS WANTED THE PATH TO USE AND WHICH IS NOW, IN PART, PROPOSED BY NE. THE CARDURNOCK PENINSULA ROAD IS SIGNIFICANTLY BUSIER THAN WHEN IT WAS REJECTED, BY CUMBRIA COUNTY COUNCIL, AS THE ROUTE FOR THE THEN PROPOSED CUMBRIA COASTAL WAY [CCW]. THE AGREED ROUTE OF THE CCW CUT ACROSS THE PENINSULA FROM KIRKBRIDE TO DRUMBURGH BUT THE GUIDEBOOK TO THE CCW COVERED THE 20KM OR SO ROAD ROUTE FROM KIRKBRIDE TO BOWNESS-ON-SOLWAY FOR THOSE WALKERS DETERMINED TO HAVE A MORE COASTAL ROUTE BUT, GIVEN THE NATURE OF THE ROUTE, WITH EXPRESSED RESERVATIONS. WHILST THE APPROACH TAKEN BY NE AND APPROVED MAKES THE WALKING OF THIS ROUTE A LITTLE IMPROVED ON THE SECONDARY ROUTE OF THE CCW IT IS STILL FAR FROM SATISFACTORY. THE RAMBLERS AND OSS WOULD HAVE LIKED TO HAVE SEEN A MORE PROACTIVE APPROACH BY NE TO THIS c20km SECTION OF THE KC111ECP AND REGARD THIS SECTION AS ONE OF THE MOST ECP THE MOST UNSATISFACTORY LENGTHY SECTION OF THE PATH IN CUMBRIA. THIS MODIFICATION PROPOSAL ADDS TO THOSE CONCERNS. WITH THE INCREASE IN TRAFFIC FROM NEAR KIRKBRIDE TO ANTHORN, ESPECIALLY CYCLISTS, ALONG WITH FREQUENT USE BY CARS AND BUSES AND THE NATURE OF THE CARRIAGEWAY MAKES THE USE OF THE ROAD [AS NOW PROPOSED AS GAL-MR3-S004] AS TOTALLY UNSUITABLE. THIS CHOICE FAILS TO TAKE APPROPRIATE ACCOUNT OF THE NEEDS OF PATH USERS.	

IT APPEARS THAT THE NEW ROUTE PROPOSAL [GAL-MR3-S001; S002; &S003] IS TO BE CONTAINED WITHIN A BARBED WIRE CORRIDOR. THIS WILL PROVIDE A FURTHER LOSS OF AMENITY TO WALKERS.

THE AREA AROUND THE ESTUARY OF THE RIVER, BOTH UPSTREAM AND DOWNSTREAM OF THE BRIDGE ON THE ROAD INTO KIRKBRIDE WERE FORMERLY REGISTERED AS COMMON LAND BUT, AFTER DUE PROCESS, MOST OF THIS LAND WAS DE-REGISTERED. ONLY ONE AREA REMAINS COMMON LAND, AND CONSEQUENTLY S1 CROW ACCESS LAND AND SHOULD THE CURRENTLY PROPOSAL BY NE BE ACCEPTED THIS LAND WILL AGAIN BE AN ACCESS LAND 'ISLAND' - WHICH WE UNDERSTAND MAY BE CONTRARY TO NE POLICY.

WE URGE THAT THIS MODIFICATION PROPOSAL BE STRONGLY RESISTED.

Natural England's comments

We are grateful for the views provided on behalf of the Ramblers and Open Spaces Society. As is pointed out in this representation, the originally proposed route was subject of two objections, which were considered at a hearing in Wigton, in November 2017. As a result of that hearing, Natural England was asked to consider whether there were any other options for the alignment of the coast path which might better strike the fair balance required.

The modification published in report GAL-MR3 is the only such option which was identified, taking into account a range of relevant factors and constraints.

NE accepts that aligning the King Charles III England Coast Path along roads – even relatively minor roads – is not the preferred solution. However, in some cases, it proves to be the only or the best option. Recommendations for works to mitigate risks have been initially set out by NE – and these have been accepted by the highways authority (Cumberland Council). If the modified route is approved, further consideration will be given to the design of such measures, prior to the route being opened to walkers. The modified route involves approximately 850m of road or roadside walking, compared with the originally proposed route, but it would allow the retention of approximately 1.75km of off-road walking (predominantly along the estuary side), between Anthorn and Whitrigg.

NE believes that the modified route, as set out in GAL-MR3, represents the best balance between the experience for walkers and the rights of all affected or potentially affected landowners/occupiers (taking into account the concerns expressed by the inspector in relation to the route originally proposed).

In order to address the concerns of the key landowner, NE considers that it is wise to separate walkers from livestock, on route sections GAL-MR3-S002 and S003. The remaining parts of the field through which these sections pass would not form part of the coastal margin, so there is no unnecessary restriction to new access rights as a result of any fence alongside these two sections.

Relevant appended documents (see section 4):

None supplied

4. Supporting documents

None received or appended