

Proposed changes to the England Coast Path at Saunton Down, Down End, Croyde

Natural England's Variation Report to the Secretary of State

Coastal Access Variation Report VR11
March 2022

Part 1: Purpose of this report

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

1.2 On 13 January 2021 the Secretary of State approved Natural England's proposals relating to Woolacombe to Cock Rock, Croyde (CMM 3) which formed part of our proposals for the Combe Martin to Marsland Mouth stretch:

<https://www.gov.uk/government/publications/coastal-access-section-52-notice-for-combe-martin-to-marsland-mouth>

Whilst the proposals have been approved, Natural England and Devon County Council are currently working to prepare the trail for public use and as such the coastal access rights for this stretch have yet to commence.

Length CMM 4 (Cock Rock, Croyde to Velator) has yet to be approved by the Secretary of State.

1.3 Since the approval of report CMM 3, it has become clear that a change is necessary to the route of the England Coast Path. This report contains Natural England's proposals relating to that change at Down End, Croyde, which is at the location shown on the **VR11 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 provides vital context to the proposal set out in this Variation Report.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/856140/combe-martin-marsland-mouth-overview.PDF

1.6 In this unusual situation we are asking the Secretary of State not to approve certain sections of CMM 4 (CMM-4-S001 to CMM-4-S005 (part) and this Variation Report will effectively join up the gap that remains.

The reason for this is to ensure that there is only one process to go through – a single Variation Report rather than a Variation Report and a Modification Report.

The South West Coast Path

1.7 The South West Coast Path (SWCP) generally follows the coast over the Combe Martin to Marsland Mouth stretch and for the most part our original proposals proposed adopting the walked line of this route as the line of the England Coast Path. However, at Saunton Down, Down End, Croyde, we have proposed improvements to the existing route line. There may also be places where the walked line of the SWCP differs slightly from the route that was originally approved for it by the Secretary of State, because the path has evolved over time to cope with coastal erosion and other processes. In both situations, as explained at part 6a of the Overview to the original report, assuming these proposals are approved, the intention is that a separate variation report to the Secretary of State should in due course change the route of the existing national trail to reflect the approved line of the England Coast Path (ECP), insofar as the two are different.

Map VR11 - Variation Location Map Combe Martin to Marsland Mouth Stretch

 Variation 1 - Saunton Down, Down End, Croyde



Part 2: Proposed variation at Saunton Down, Down End, Croyde

Start Point: Cock Rock, Down End, Croyde	Grid reference: SS 4341 1387
End Point: Chesil Cliff, Down End, Croyde	Grid reference: SS 4338 1382
Relevant Original Proposal Maps:	CMM 3e and CMM 4a

2.1 Introduction

Reason for variation:

2.1.1 Following discussions with the owners of Oyster Falls and Down End Car Park, a new route avoiding the hazardous road crossing between Chesil Cliff House and Oyster Falls, has been proposed. In addition, this new route provides spectacular high level views to the north (over Croyde beach towards Baggy Point), to the west (Lundy Island, on a clear day) and to the south west (as far as Hartland Point).

Proposed variation:

2.1.2 Our original alignment of the ECP in this area, as proposed in Natural England's original reports https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/93943/7/combe-martin-marsland-mouth-report-3.PDF

and

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/85516/6/combe-martin-marsland-mouth-report-4.PDF

followed the existing South West Coast Path (SWCP), a public footpath, from Down End Beach, up concrete steps and then along the seaward edge of fields to the promontory below Chesil Cliff House, up towards the old Coastguard Lookout and then diagonally up the slope towards the property known as Oyster Falls before crossing the road and rejoining the existing SWCP above Oyster Falls and on to Saunton.

2.1.3 The proposed variation would remove the originally proposed trail sections CMM-4-S001 to CMM-4-S005 (part) from the trail but they would still be accessible to walkers as they are a public right of way. Trail sections CMM-3-A017 RD and CMM-3-A018 FP currently form part of the alternative route on the approved trail. These would become part of the main route, becoming trail sections CMM-VR11-S001 FP and CMM-VR11-S002 RD. The ECP would then follow a new path over Saunton Down, joining up with trail section CMM-4-S005 at Chesil Cliff. (See Map VR11 – Route over Saunton Down, Down End, Croyde).

2.1.4 As a consequence of these proposed changes, all land seaward of the trail would become part of the coastal margin. This would increase the size of the coastal margin in the area which would now include the fields below Croyde Road (Down End) and the gorse covered slopes above Oyster Falls, but not the adjacent accepted land.

2.1.5 The variation provides a very different 'user experience' to the original route of the South West Coast Path and that proposed by Natural England in January 2020. As well as providing a much safer road crossing, the varied route provides spectacular high level views of the Devon coast not previously accessible.

Considering the options:

2.1.6 We considered a range of road crossing options and locations between Chesil Cliff House and Down End Car Park in addition to the current 'on-road' walking between Chesil Cliff House and Oyster Falls and the proposed new steps and crossing point at Oyster Falls.

These included i) widening the road verge between Chesil Cliff House and Oyster Falls, and ii) crossing the road at Chesil Cliff House into the small quarry and constructing steps up to the coast path.

All these options had road safety concerns:- fast moving traffic (despite a 40mph speed limit), blind corners, narrow verges.

2.1.7 We worked closely with the landowners and the access authority to develop our proposal for the variation. Part 4 of the Overview explains the process that we follow in more detail.

2.1.8 The variation meets a number of the key principles of alignment and management. It provides a safe road crossing point, it is reasonably direct, will be pleasant to walk along, is no more than 200m from the coast, provides fantastic views of the sea and because of its location will not be subject to coastal erosion or flooding.

2.2 Proposals Narrative

The Trail:

2.2.1 The proposed variation to the approved trail:

- Provides a route of similar length to the original proposed route but with the benefit of dramatic high level sea views to the north, south and west.
- Will be aligned on compacted soil or mown grass along its length.
- Has no steps.
- Is aligned through rough grazing and gorse covered slopes.
- Creates a completely new access route.
- Will increase the overall cost but will provide a much safer road crossing to the benefit of coast path walkers and visitors to Down End Beach.
- Extends for a length of 540 metres at a maximum of 190 metres eastward/inland of the original route proposed (see map VR11 Route over Saunton Down, Down End, Croyde).
- Follows the existing public footpath from the top of the steps up from the beach at Down End, along trail section CMM-VR11-S001 (previously trail section CMM-3-A018, part of the approved alternative route), crossing the Croyde to Saunton road at trail section CMM-VR11-S002 (previously trail section CMM-3-A017 RD, part of the approved alternative route), and then on grass adjacent to the track up to Heather Down (trail section CMM-VR11-S003), passing through an existing field gate and onto an old track (trail section CMM-VR11-S004) before passing through a newly created gap in the hedge bank and onto the gorse/scrub slopes of Croyde Down between Heather Down and Downend House (trail section CMM-VR11-S005).
- Will be screened from Down End House by the existing dense gorse scrub. At the top of Saunton Down the route then heads down the gorse covered slopes (trail section CMM-

VR11-S006) before re-joining the existing South West Coast Path about 100 metres east of Chesil Cliff House part way along existing trail section CMM-4-S005.

Protection of the environment:

2.2.2 No internationally or nationally designated sites will be affected by this variation, and therefore there is no need to consider the consequences of it for the Habitats Regulations Assessment (HRA) of coastal access proposals between Combe Martin and Marsland Mouth. Natural England is satisfied that the proposed variation is in accordance with relevant environmental protection legislation.

Accessibility:

2.2.3 The proposed trail consists of a concreted path/tarmac road crossing (trail sections CMM-VR11-S001 & CMM-VR11-S002), on grass (trail section CMM-VR11-S003) through an existing field gate and onto a track with a compacted gravel surface (trail section CMM-VR11-S004). Trail sections CMM-VR11-S005 and CMM-VR11-S006 will be cut through gorse/bramble scrub and will have a soil/turf surface. Like the original proposed route, the modified one is likely to be unsuitable for some people with reduced mobility because of the nature of the terrain. The original proposed alignment has sets of steps that can be very slippery/muddy in wet weather. The varied alignment will not have any steps but will be relatively steep in places. In addition, it will have a much safer road crossing point.

Where we have proposed exercising statutory discretions:

Landward boundary of the coastal margin:

2.2.4 We have used our discretion on some sections of the varied route to map the landward extent of the coastal margin to an adjacent physical boundary such as a fence line or track to make the extent of the new access rights clearer.

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

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:

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

Coastal erosion:

2.2.7 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.

2.2.8 We have chosen not to make any such proposal in this variation report. Accordingly, the route is to be at the centre of the line shown on map VR11 Variation 1, Saunton Down, Down End, Croyde as the proposed route of the trail.

Establishment of the trail:

2.2.9 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.

2.2.10 Our estimate of the capital costs for these works is £29,000. This is an increase of around £9,000 compared to the original route set out in our report to the Secretary of State on 15 January 2020. This is mainly due to the fact that there will need to be a new path cut through the gorse/bramble scrub over Saunton Down and a much-improved road crossing at Down End car park.

2.2.11 Summary of cost implications:

- Original cost estimate for establishment of submitted route (trail sections CMM-4-S001 to CMM-4-S005 = £20,000
- Cost estimate for establishment of proposed varied route = c.£29,000
- Likely increase = £9,000

2.2.12 These estimates are informed by information already held by the access authority.

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

- Improved road crossing point at Down End car park (c.£25,000)
- The new path over Saunton Down will need to be cut by machine (£2,000)
- New pedestrian gates and signposts (£2,000)

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

Maintenance of the trail:

2.2.15 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 15 January 2020.

There will be a marginal additional scrub/vegetation annual clearance cost as the new route is c.60m longer than originally proposed.

2.3 Proposals Tables

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

Table 2.3.1: Map VR11 – Route over Saunton Down, Down End, Croyde

Key notes on table:

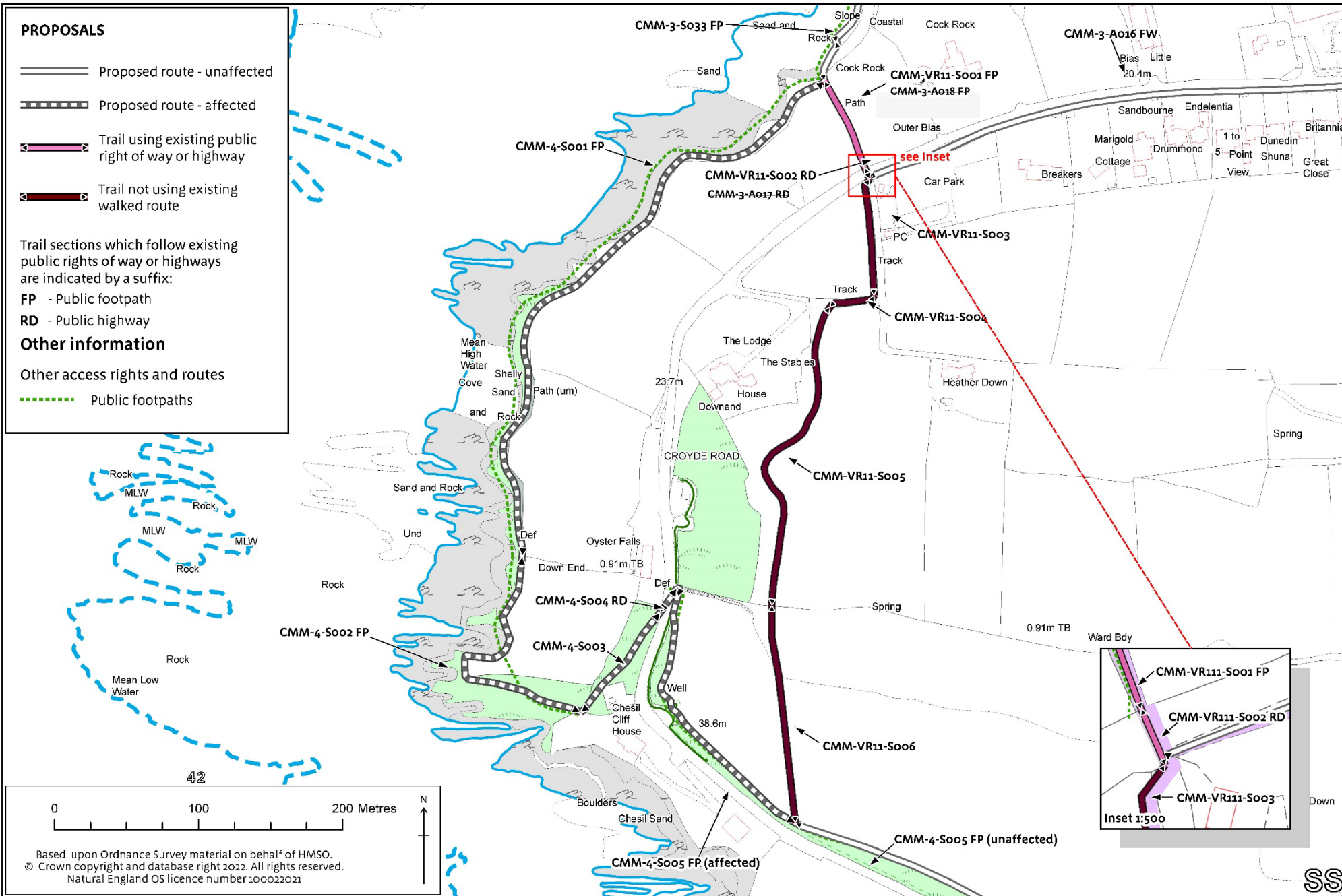
Column 4 – ‘No’ means no roll-back is proposed for this route section. ‘Yes – normal’ means roll-back is proposed and is likely to follow the current feature (e.g. cliff edge/beach) for the foreseeable future as any coastal change occurs.

1. 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.
2. 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 7 of report Overview)	Landward margin contains coastal land type?	Proposal to specify landward boundary of margin	Reason for landward boundary proposal	Explanatory notes
VR11	CMM-VR11-S001	Public footpath	No	No	Wall	Clarity and cohesion	Formerly route section CMM-3-A018 FP (approved)
VR11	CMM-VR11-S002	Public highway	No	No			Road crossing. Formerly route section CMM-3-A017 RD (approved)
VR11	CMM-VR11-S003	Not an existing walked route	No	No	Landward edge of path	Clarity and cohesion	
VR11	CMM-VR11-S004	Not an existing walked route	No	No	Hedge bank/Wall	Clarity and cohesion	

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 7 of report Overview)	Landward margin contains coastal land type?	Proposal to specify landward boundary of margin	Reason for landward boundary proposal	Explanatory notes
R11	CMM-VR11-S005	Not an existing walked route	No	No	Landward edge of (new) path	Clarity and cohesion	
VR11	CMM-VR11-S006	Not an existing walked route	No	No	Landward edge of (new) path	Clarity and cohesion	

Map VR11 - Variation 1 - Saunton Down, Down End, Croyde



Map VR11 - Variation 1 - Saunton Down, Down End, Croyde

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