

**Devon Countryside Access Forum response  
England Coast Path - Variation Report CMM VR 11 Down End, Croyde,  
North Devon. Natural England.**

FORM FOR MAKING REPRESENTATIONS ABOUT A COASTAL ACCESS VARIATION REPORT	
<p><b>Any person may make a representation about a coastal access variation report.</b></p> <p>This form should be completed if you wish to make a representation about the coastal access variation report which Natural England submitted to the Secretary of State for Environment, Food and Rural Affairs on 3 March 2022 under section 55(1) of the National Parks and Access to the Countryside Act 1949. The report relates to coastal access at Down End, Croyde, Devon.</p> <p>It proposes variations to the proposals for these sections of coast that were approved by the Secretary of State on 13 January 2021 pursuant to his duty under section 296(1) of the Marine and Coastal Access Act 2009, as part of Natural England's original report proposals for the stretch known as Combe Martin to Marsland Mouth.</p> <p><b>Any representations about this variation report must be made on this form and received by Natural England no later than 23:59 hrs 28 April 2022.</b> If you require more space for your comments, please continue on a separate sheet.</p>	
<p>1. Please state the variation location and map number to which the representation(s) relate(s) - see notes:</p>	
<p>Variation Report CMM VR 11 Down End, Croyde, North Devon (CMM 1324)</p>	
<p>2. If the representation(s) relate to specific land on the map(s), please describe the land here:</p>	
<p>3. Please tick the appropriate box below to show who is making the representation(s), or on whose behalf you are making the representation(s):</p>	
An access authority for an area in which land to which the report relates is situated	<input type="checkbox"/>
A local access forum for an area in which land to which the report relates is situated	<input checked="" type="checkbox"/>
The Historic Buildings and Monuments Commission for England (English Heritage)	<input type="checkbox"/>
The Environment Agency	<input type="checkbox"/>
A person specified in Schedule 1 to the Coastal Access Reports (Consideration and Modification Procedure) (England) Regulations 2010 (S.I. 2010/1976)	<input type="checkbox"/>
Other (please give details):	<input type="checkbox"/>
4. If you have ticked the "other" box above, please also indicate if you are a person with a relevant interest (within the meaning of section 55J(2) of the National Parks and Access to the Countryside Act 1949 <sup>(a)</sup> ) in land to which the report relates	<input type="checkbox"/>
<p>5. Please give details of, and the reasons for, the representation(s) you are making about Natural England's report:</p>	
<p>The Devon Countryside Access Forum generally supports the proposed variation. It will provide good views of the sea, although away from the coast, and will include a safer road crossing than the route originally proposed. The improved access to facilities is welcome. However, it is a finely balanced decision for the following reasons.</p>	

1. The southern part of the route may need reconsideration to overcome steepness issues and ensure it is easy to negotiate.
2. Cutting a path through gorse/bramble scrub could result in the path becoming muddy and therefore the gradient and surfacing of the path is important.
3. The proposed route is some distance from the sea, and therefore roll-back is not applicable. Georgeham Footpaths 18, 62 and 75, which do adhere to the coast, would still be available and could provide the requisite proximity to the coast. However, under these proposals they will no longer form part of the England Coast Path. Potentially this means that Georgeham Footpaths 18, 62 and 75, largely used as part of the original England Coast Path route, could be lost to the sea through erosion and there would be no mechanism to roll-back and reinstate them.
4. The Forum recognises the benefits of having both the footpath route near the coast and the proposed inland route but is aware there will be increased maintenance costs overall as a result.
5. It is noted that all land seaward of the trail would become part of the coastal margin, other than excepted land, and would include the fields below Croyde Road (Down End) and the slopes above Oyster Falls. Even if parts are not readily accessible, this may be a concern for landowners.

The Devon Countryside Access Forum would encourage the use of accessible path furniture in assessing the capital costs to ensure that as much as possible of this scenic route is open to all users. Signage to indicate both routes would be welcome.

6. Please list below any documents or evidence you have included in support of the representation(s):

7. Have you made any other representations about the report?

Yes

No

8. If you are a person with a relevant interest in land to which the report relates, have you made any objection(s) which relate(s) to that land?

Yes

No

9. Please complete your details below:

Name:

Hilary Winter, Forum Officer

Organisation/company (if appropriate):

Devon Countryside Access Forum

The Devon Countryside Access Forum (DCAF) is a local access forum under the Countryside and Rights of Way Act 2000 (CRoW Act). Its statutory remit is to give independent advice "as to the improvement of public access to land in the area for the purposes of open-air recreation and the enjoyment of the area..." Section 94(4) of the Act specifies bodies to whom the Forum has a statutory function to give advice, and this includes Natural England.

The DCAF currently has nineteen members, appointed by Devon County Council, who represent the interests of landowners/managers,

	access users and other relevant areas of expertise such as conservation and tourism.
Address (including post code):	c/o Public Rights of Way team Great Moor House Bittern Road Sowton Exeter EX2 7NL
Telephone:	07837 171000
E-mail:	hilary.winter@devon.gov.uk
Date:	28 April 2022
10. The completed form should be sent to Natural England at:  <a href="mailto:southwestcoastalaccess@naturalengland.org.uk">southwestcoastalaccess@naturalengland.org.uk</a>	
(a) Section 55J(2) provides that a person has a relevant interest in land if the person is the owner of the land, holds a term of years absolute in the land, or is in lawful occupation of the land.	