

Lambert, Fiona

From: Teague, Gwyn W
Sent: 13 November 2020 13:10
To: Lankshear, Robert
Cc: Cottnam, Tricia
Subject: Cosmeston Farm Development

Hi Rob

Supplementary to our previous response we wish to draw your attention to the future needs of the Public Rights of Way network in relation to the Cosmeston Farm site.

Public Footpath 2, Lavernock (FP 2) runs along the cliff top to the east of the site. FP 2 carries the Wales Coast Path, and as such in addition to the ordinary footpath status it is also an internationally promoted long distance trail.

Two issues exist with the present alignment of the path, these are

- Erosion of the cliff face which threatens loss of the path; and
- Drainage conditions along the path causing scouring and severe surface damage on a seasonal basis.

During September of this year we were advised by the Council's engineers that two recent cliff falls had been inspected. As a result of the falls sections of the path were noted to be within 2m of the edge. Our advice was that further falls should be anticipated due to the Marl (mudstone) geology and that remaining material liable to fall away had been observed around the falls. The drainage conditions on sections of the path alongside the site are also such that the surface frequently becomes severely affected by rutting and scouring. Various interventions have been implemented on the current alignment without long term success and it is likely that a more developed scheme will be needed to address the issue.

In order to ensure the continued existence of the path it will need to be rolled back into the development site. A margin of 20 metres from the current path alignment is appropriate. Drainage issues on the existing path should be addressed following roll back onto the new alignment by provision of an appropriate surface with drainage scheme.

[Guidance for local authorities on public rights of way](#) issued by the Welsh Government says, at para 7.9:

When an existing right of way needs to be revised to accommodate the planned development, any alternative alignment should avoid the use of estate roads, drives, gardens or other private areas wherever possible and preference should be given to the use of made-up estate paths through landscaped or open space areas away from vehicular traffic. The potential of alternative routes to encourage sustainable transport and active travel should also be considered.

We are therefore opposed to incorporation of The Wales Coast Path into footways or estate roads. It is appropriate that instead provision be included within the development for accommodation of the path in a green margin along the eastern face of the site. We note that wider benefits in relation to resilience of the development against retreating cliff lines will likely also result from such an approach. The Wales Coast Path is an asset of national importance. Preserving the character of the route, particularly on FP 2 which links a population centre to tourist accommodation (caravan park) and a wildlife trust site, is critical to ensuring the wellbeing and tourism benefits that it currently provides are able to be satisfactorily maintained.

Kind regards

Gwyn Teague
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