

Coastal Access – Kent Stretch 1 (Ramsgate to Folkestone):



Summary of ‘Other’ Representations on Report with Natural England’s comments

Introduction

This document categorises, summarises and comments on representations we have received on this report which have not come from those persons or bodies whose representations we are required to send in full to the Secretary of State.

Background

Natural England’s report setting out its proposals for improved access to the coast between Folkestone and Ramsgate in Kent was submitted to the Secretary of State on 28th October 2013. This began an eight week period during which formal representations and objections about the report could be made. A representation about the report could be made during this period by any person, on any grounds, and could include arguments either in support of or against Natural England’s proposals.

In total Natural England received 10 representations, of which 1 was made by organisations or individuals 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. These ‘full’ representations have been submitted separately together with Natural England’s comments where relevant. This document summarises and, where relevant, comments on the 9 representations submitted by other individuals or organisations referred to here as ‘other’ representations.

Before making a determination in respect of a coastal access report, the Secretary of State must consider both of these documents.

Categorising 'other' representations

The following tables categorise the 'other' representations by several themes. An individual representation may include comments that relate to more than one chapter or theme. In addition one organisation may be both a landowner and a public body.

REPORT CHAPTER	Number of representations	Unique identifiers for reps
Whole Report		
Chapter 1	6	MCA\Folkestone to Ramsgate\R\2\RFK0162 MCA\Folkestone to Ramsgate\R\5\RFK0294 MCA\Folkestone to Ramsgate\R\6\RFK0313 MCA\Folkestone to Ramsgate\R\7\RFK0299 MCA\Folkestone to Ramsgate\R\9\RFK0110 MCA\Folkestone to Ramsgate\R\10\RFK0292
Chapter 2	2	MCA\Folkestone to Ramsgate\R\1\RFK0312 MCA\Folkestone to Ramsgate\R\5\RFK0294
Chapter 3		
Chapter 4	2	MCA\Folkestone to Ramsgate\R\10\RFK0292 MCA\Folkestone to Ramsgate\R\11\RFK0168
Overview	3	MCA\Folkestone to Ramsgate\R\5\RFK0294 MCA\Folkestone to Ramsgate\R\6\RFK0313 MCA\Folkestone to Ramsgate\R\8\RFK0291
NCA Report	2	MCA\Folkestone to Ramsgate\R\1\RFK0312 MCA\Folkestone to Ramsgate\R\9\RFK0110

OVERALL REPORT (Themes)	Number of representations	Unique identifiers for reps
a) The route	4	MCA\Folkestone to Ramsgate\R\1\RFK0312 MCA\Folkestone to Ramsgate\R\2\RFK0162 MCA\Folkestone to Ramsgate\R\10\RFK0168 MCA\Folkestone to Ramsgate\R\11\RFK0292
b) The landward boundary of the coastal margin (spreading room)		
c) Need for local restrictions or exclusions (and/or the need to manage land within the margin)	7	MCA\Folkestone to Ramsgate\R\1\RFK0312 MCA\Folkestone to Ramsgate\R\5\RFK0294 MCA\Folkestone to Ramsgate\R\6\RFK0313 MCA\Folkestone to Ramsgate\R\7\RFK0299 MCA\Folkestone to Ramsgate\R\8\RFK0291 MCA\Folkestone to Ramsgate\R\9\RFK0110 MCA\Folkestone to Ramsgate\R\10\RFK0168 MCA\Folkestone to Ramsgate\R\11\RFK0292
d) Alternative route	1	MCA\Folkestone to Ramsgate\R\11\RFK0292
e) Discretion to include an estuary		
f) 'Roll back'		
g) General comments		MCA\Folkestone to Ramsgate\R\1\RFK0312

OVERALL REPORT (who made the representation)	Number of representations	Unique identifiers for reps
Individuals	4	MCA\Folkestone to Ramsgate\R\1\RFK0312 MCA\Folkestone to Ramsgate\R\6\RFK0313 MCA\Folkestone to Ramsgate\R\7\RFK0291 MCA\Folkestone to Ramsgate\R\8\RFK0291
Public bodies	2	MCA\Folkestone to Ramsgate\R\2\RFK0162 MCA\Folkestone to Ramsgate\R\9\RFK0110
Voluntary and membership groups	1	MCA\Folkestone to Ramsgate\R\5\RFK0294
Landowners and occupiers	2	MCA\Folkestone to Ramsgate\R\10\RFK0292 MCA\Folkestone to Ramsgate\R\11\RFK0168

Summary of 'other' representations

Chapter 1:

Organisation making representation: Miss Eileen Richford – Ramsgate Town Council
Unique Reference Number: MCA\Folkestone to Ramsgate\R\2\RFK0162
Chapter 1 Sections: RFK-S001 -S018
Summary of Representation: Ramsgate Town Council has initiated a promoted walk north from Pegwell, along coastal paths, and suggests that the ECP could be linked in to the bid.
Natural England Comment The existing 'Contra trail' runs along the proposed trail line around the northern part of Pegwell Bay to Ramsgate, so future joint promotion of this trail and the England Coast Path is possible through Explore Kent, KCC and Ramsgate Town Council. During implementation, Natural England will liaise with Ramsgate Town Council and KCC over signage of the England Coast Path, in order to consider whether new signage includes reference to the Contra Trail. No changes to the Proposals are suggested as a result of this Representation.

Organisation making representation: Denisa Delic, Kennel Club
Unique Reference Number: MCA\Folkestone to Ramsgate\R\5\RFK0294
Chapter 1, Route sections: RFK-S007 to RFK-S037; Chapter 2: RFK-I005 to RFK-I009 and Overview (Map E & F pages 30 and 31)
Summary of Representation: Sandwich & Pegwell Bay Supportive of the proposals in general and on Areas 1, 2, 5 and 6 on Maps E and F. However, restrictions are not justified on Areas 3 and 4, outwith the notified wintering and migrating periods, and the on-lead restriction on area 7. Off lead access is the most important amenity for walkers with dogs. Off lead access while under effective control should not be restricted without good evidence and in a targeted manner.
Natural England Comment: We welcome the support from the Kennel Club for the majority of the Proposals. As identified in the Scheme, at section 4.9 on sensitive features, we have looked to find the best outcome that secures opportunities for engagement and access so far as is practicable while ensuring appropriate protection of key sensitive features. We considered that special intervention was necessary within this National Nature Reserve due to the likelihood of more people using the sensitive areas of the Bay as a direct consequence of coastal access. We have adopted the least restrictive access option to ensure we meet the obligations of European legislation on wildlife sites as well as protecting an important range of habitats and species found here. We drew on expertise within Natural England and evidence from the British Trust for Ornithology and from local external partners, before deciding on the final proposal. This

evidence and advice is detailed in the Nature Conservation Report, published alongside our Report for the stretch. The current evidence, whilst not conclusive, indicates that recreational disturbance may already be affecting the bird populations in this area, and that any additional use from coastal access would increase the impact on populations of these migratory birds. On balance we concluded that measures to reduce new use of the flats within the Bay were justified.

Because the evidence was complex, we escalated the issues through Natural England's internal quality assurance process to ensure we had adequately assessed the complexities, especially relating to any potential impacts on the European sites.

In Areas 3 & 4 we have proposed permanent exclusions of coastal access rights. This is due to the sensitive wildlife features in this area. Significant populations of migratory birds use the mudflats off the Pegwell beach (Area 3) & off Sandwich peninsula (Area 4) to feed and roost. They can be disturbed from feeding by walkers and dogs coming onto the intertidal mud. Golden plover and turnstone are features of the European Special Protection Area designation and just two of the many species that winter and feed here in great numbers. The exclusions continue into the summer, as some of these migratory birds notified under the SSSI (grey plover and ringed plover), along with oystercatcher and bar-tailed godwit, use the mud flats into the summer months, before departing on migration. For example, during May to August, significant numbers of curlew, oystercatcher as well as shelduck feed on the mudflats.

Area 7 is a stretch of rocky beach below Pegwell cliffs. The Proposals will provide a new right of pedestrian access to this area which had no previous acknowledged right, and where the local owners and managers did not previously welcome the de-facto use of the area by walkers and dog walkers. We have proposed a permanent 'dogs on lead' restriction along this 1.5km section to reduce the potential for disturbance to the feeding and roosting birds from walkers' dogs running on the beach or onto the mud. This is particularly because of:

- Wintering turnstone that use the beach to feed and roost. Whilst more robust to public disturbance, there are concerns over the recorded decline of this North Kent population – a key feature of the European Special Protection Area designation.
- Golden plover and other migratory birds that use the mudflats. The restriction extends through the summer, as some of these migratory birds notified under the SSSI (grey plover and ringed plover), along with oystercatcher and bar-tailed godwit, use the mud flats into the summer months, before departing on migration. For example, during May to August, significant numbers of curlew, oystercatcher and shelduck are still feeding on the mudflats.

With an area to the east of Area 7 'West Cliff' promoted by Thanet District Council as a dog walking area – there is an alternative area to walk dogs off-lead outside the National Nature Reserve.

No changes to the Proposals are suggested as a result of this Representation.

Unique Reference Number: [MCA\Folkestone to Ramsgate\R\6\RFK0313](#)

Chapter 1, Route sections: [RFK- S012 to RFK- S018](#), **Map 1.2** (not specified in representation). Overview page 27 and Area 7, Map E and Areas 3&4

Summary of Representation: This representation is from a dog walker who walks here when the tide is out and bird life is far away. She considers the exclusions and restrictions excessive, especially when bird life has left the Bay on migration.

Below Pegwell Bay cliffs the undercliff is covered with marine sea weed and uneven: difficult and dangerous to walk dogs on leads here.

Natural England Comment:

Natural England has sought to propose the least restrictive policy on Area 7 ('the undercliff'), which creates a formal right of access to this 1.5km stretch of beach for the first time, whilst requiring people to keep dogs on lead. The aim is to prevent dogs from running across the beach and the mud flats (areas 3 and 4), which could disturb the populations of important migratory birds. These birds are present in the winter and throughout the year, as described under representation [MCA\Folkestone to Ramsgate\R\5\RFK0294](#) (Kennel Club).

In making this decision, we drew from expertise within Natural England, evidence from the British Trust for Ornithology and from local external partners. The current evidence, whilst not conclusive, indicates that recreational disturbance in the Bay may already be affecting these populations and any additional use from coastal access would increase the impact on populations of these migratory birds. On balance we concluded that measures to minimise new use of the flats were justified.

Area 7 ('the undercliff') is part of the coastal margin associated with the cliff top trail alignment. The trail itself follows a well known route for dog walkers. If walkers are concerned about the safety of walking within Area 7, for example if there is a high tide, the trail offers another option. As part of the proposals, we plan to improve the signage in this area at the main access points to Area 7, and could include messages regarding the tidal environment.

Unique Reference Number: [MCA\Folkestone to Ramsgate\R\7\RFK0299](#)

Chapter 1, RFKS019, RFKS020 & RFKS021

Summary of Representation: Sandwich & Pegwell Bay

This representation comes from a voluntary Coastal Warden, and they see no justification in the restrictions on Area 7 in the summer, as families and dogs regularly use this area when there are few wading birds present. In the winter dog walkers help to manage and monitor the Bay and have never seen dogs chasing birds. Suggests notices to request people keep their dogs off the mudflats.

Natural England Comment

As with the representation [MCA\Folkestone to Ramsgate\R\5\RFK0313](#), Natural England has sought to propose the least restrictive policy on Area 7, which creates a formal right of access to this 1.5km stretch of beach for the first time, whilst requiring people to keep dogs on lead. This aims to prevent dogs from running across the beach and the mud flats, which could disturb the important populations of migratory birds. These birds are present throughout the year, as described under representation [MCA\Folkestone to Ramsgate\R\5\RFK0294](#) (Kennel Club).

In making this decision, we drew from expertise within Natural England, evidence from the British Trust for Ornithology and from local external partners. The current evidence, whilst not conclusive, indicates that recreational disturbance in the Bay may already be affecting these populations and additional use from coastal access would increase the impact on populations of these migratory birds. This necessitated measures to minimise new impacts on the flats.

Organisation making representation: Thanet District Council

Unique Reference Number: MCA\Folkestone to Ramsgate\R\9\RFK0110

Chapter 1, Route sections: RFK-S001 to RFK-S031 (Maps 1.1 – 1.3). Nature Conservation Assessment Report p30 Map E and p32 Map F (not specifically referenced in representation)

Summary of Representation: TDC endorses and supports the proposals and welcomes the proposals to exclude coastal access rights within Pegwell and Sandwich Bay (SPA, SACs, Ramsar, NNR and SSSI designations). Welcomes the proposals to engage with local users to establish the trail and restrictions.

Further clarification is required regarding the nature of the restrictions and exclusions as they will not prevent 'current and new' recreation (non CROW rights), that could harm the wildlife interest of the Bay. The restriction in Area 7 of Pegwell Bay to keep dogs on leads is uncontrollable and therefore dogs could have an adverse effect on the bird interest.

A monitoring programme would be helpful to assess disturbance to European site interest from coastal access use and to monitor effectiveness of the recommended measures.

Account needs to be taken of the likely increase in recreational use and potential disturbance due to coastal access use. This will be exacerbated due to 'in-combination' pressures from current and proposed new housing development and people pressure.

Natural England Comment:

Natural England welcomes the support of Thanet District Council for the Proposals and for the restriction and exclusion measures identified as necessary within Sandwich & Pegwell Bay.

We have assessed the Proposals for a Coast Path under the Habitats Regulations 1994. A key element of the proposal was the measures required to prevent future disturbance arising directly from coastal access from having a significant effect, either alone or in-combination with other proposals (such as developments nearby). This included restrictions and exclusions on coastal access rights and signage and engagement to inform local users of the changes.

We escalated the internal quality assurance on this matter to ensure we had adequately assessed the complex situation in this area, relating to any potential impacts on the European sites. We were advised that the proposal would not have a likely significant effect alone or in-combination with other projects. As a precautionary measure we included in the proposal the provision and commitment to undertake monitoring, as detailed in section 4.3 of the Coastal Access Ramsgate to Folkestone Nature Conservation Assessment Reports (Sandwich):

- Natural England will develop a monitoring programme to help ensure the effectiveness of the proposed measures. This monitoring will commence in this area when the coastal access rights take effect.
- This monitoring will also take account of ongoing bird monitoring of the area, including WeBs data collection, ongoing research into Turnstone and disturbance event data already collected on the site.
- Though we do not expect the proposals to have a significant effect, if unexpected

impacts are detected we would consider whether these are wholly or in part attributable to people exercising their new Coastal Access rights and whether further measures are required to address these impacts. These could if necessary include further restriction or exclusion of the rights, using the regime under chapter 2 of Part 1 of the Countryside and Rights of Way Act 2000, or consideration of whether the trail should be realigned in specific ways.

We have therefore committed to undertake monitoring here and believe we have taken account of other pressures on the site. We do not consider it necessary to further assess the effects from other projects.

Organisation making representation: Marcella Styles - National Grid

Unique Reference Number: [MCA\Folkestone to Ramsgate\R\10\RFK0292](#)

Chapter 1, RFK-S027 and RFK-S028 (Map 1.4).

Chapter 4 RFK-S203 (Map 4.7)

Summary of Representation: National Grid is broadly supportive of the proposals. However there does not appear to be any mention of the existing National Grid infrastructure in the area (the England-France Interconnector (IFA) at Folkestone) or the proposed major infrastructure project (the England-Belgium Interconnector (NEMO)) at Pegwell Bay.

Natural England Comment:

Please also see comments in Chapter 4 relating to this representation.

Planning permission for the England-Belgium Interconnector pipeline (NEMO) was granted during the published period of the Proposal Report (December 2013). The route of the pipeline will lie adjacent to an existing promoted path around Pegwell Bay. The works will create a one-off temporary compound which may require alternative arrangements for the ECP along two small sections of existing path. The development is likely to be in 2015, and the Scheme provides a mechanism to deal with operational needs and development (Chapter 5.2).

Local restrictions and exclusions are available if informal management cannot meet operational needs, and temporary diversions can also be put in place if needed. Directions for this purpose may be given inter alia on grounds of land management or public safety. Natural England will continue to work with National Grid over any implications of this development on the England Coast Path.

Chapter 2:

Unique Reference Number: [MCA\Folkestone to Ramsgate\R\1\RFK0312](#)

Chapter 2, RFK-I001 to RFK-I009 (Maps 2.2, 2.3, 2.4)

Nature Conservation Assessment Report p32 map F

Summary of Representation: The cost for the trail is not justified, and outweighs the benefit. Specifically regarding Sandwich peninsula – the route as identified will require installation of 3 footbridges and 10 kissing gates, signage and drainage works. The new route here should use existing footpaths.

Support is given to the restrictions and exclusions necessary for nature conservation around Sandwich & Pegwell Bay.

Natural England Comment:

Under section 297(2) of the 2009 Act, Natural England needs to consider the desirability of the ECP adhering to the periphery of the coast and providing sea views, while as always ensuring that costs are reasonable and proportionate. We consider the appropriate balance has been struck along this stretch.

Significant new access is being provided around Pegwell Bay and on Sandwich peninsula. The trail creates new pedestrian access along the eastern shore of the River Stour north of New Downs Farm. One-off capital costs are required to install a safe and enjoyable trail and provide information for people walking in this remote area. Costs have been minimised by collaborating with the Environment Agency, to integrate a new pedestrian path within the planned flood defences for the Peninsula – these are currently being implemented. The benefits of this route include:

- new access to the coast and estuary, offering views of the lower reaches of the Stour, estuary and the cliffs that are not presently available on existing cross peninsula paths,
- access adjacent to, and views of, the National Nature Reserve and its rich wildlife,
- creating a new circular walking route of the peninsula from Sandwich town, with potential economic benefits from tourists,
- cooperation of the majority of the landowners on the peninsula, despite initial concerns over a trail alignment in the area.
- avoidance of significant landowner concerns that would have arisen if a very large seaward coastal margin had extended from the existing, cross-peninsula footpath (Stour Valley Walk).

Costs: The Sandwich peninsula route will cost an estimated £9,550. This is a more expensive section of the Folkestone to Ramsgate Proposals, because it will provide new access to around 5.6km of this currently remote peninsula landscape.

No changes to the Proposals are suggested as a result of this Representation.

Organisation making representation: Denisa Delic – The Kennel Club

Unique Reference Number: [MCA\Folkestone to Ramsgate\R\5\RFK0294](#)

Chapter 2, Route sections: RFK-I005 to RFK-I009

Chapter 1: RFK-S007 to RFK-S037 and Overview (Map E & F pages 30 and 31)

Summary of Representation: Off lead access is the most important amenity for walkers with dogs.

Natural England Comment: We fully appreciate and endorse the importance to dog walkers of being able to exercise their dogs off leads in areas where this is lawful and practicable. But see our comments in relation to those made by the Kennel Club in Chapter 1 summary, particularly in relation to Area 4 (Chapter 2).

Chapter 3:

No Comments by any organisation or individual made on chapter 3.

Chapter 4:

Organisation making representation: Marcella Styles - National Grid
Unique Reference Number: MCA\Folkestone to Ramsgate\R\10\RFK0292
Chapter 4, Route section: RFK-S203 (Map 4.7) Chapter 1, RFK-S027 and RFK-S028 (Map 1.4).
Summary of Representation: National Grid is broadly supportive of the proposals. However there does not appear to be any mention of the existing National Grid infrastructure in the area (the England-France Interconnector (IFA) at Folkestone) or the proposed major infrastructure project (the England-Belgium Interconnector (NEMO)) at Pegwell Bay.
Natural England Comment: See also comments made regarding National Grid's representation on Chapter 1. Natural England acknowledges that the proposed trail will be over steps and near a road where National Grid may need operational access to maintain the England-France Interconnector infrastructure. As discussed with National Grid (23 January 2013) coastal access rights will not interfere in any significant way with the operational needs of National Grid. Where there is potential for visitors to disrupt work the problems can often be avoided through informal techniques such as putting up a sign or asking for their co-operation face-to-face. Local restrictions and exclusions are available if informal management cannot meet operational needs, and temporary diversions can also be put in place if needed. Directions for this purpose may be given inter alia on grounds of land management or public safety. No changes to the Proposals are suggested as a result of this Representation.

Organisation making representation: Henry Long – Network Rail
Unique Reference Number: MCA\Folkestone to Ramsgate\R\11\RFK0168
Chapter 4: Route sections: RFK-S152, RFK-S160 to RFK-S198 (Maps 4.2, 4.3, 4.4, 4.5 and 4.6)
Summary of Representation: In areas where landslide or rockfall could occur (Folkestone Warren towards Samphire Hoe), signage should be used to discourage walkers' access from cliffs to reduce erosion. For operational reasons, Network Rail requires the retention of their access rights along & from the top of the cliffs from Folkestone to Dover and to the rail tunnels. The proposed route is near operational railway, this means that if additional rights of way would be created on Network Rail land then Network Rail reserves the right to object. Network Rail also objects to creation of new rights over the railway, if there are no existing public rights and also if the path crosses the railway at level.
Natural England Comment: Our proposal aligns the trail along the top of the slumped cliff area around Folkestone Warren, following the existing North Downs Way and Saxon Shore Way. This means that Network Rail's railway line would be within the resulting coastal margin, seaward of the trail. As described in the Overview and the Scheme (Chapter 2, Figure 1), 'land used for the purposes of a railway' is automatically excepted land and therefore will have no additional access rights or crossing points as a consequence of the Proposals. No concerns were raised during the meeting on 26 th September 2011 regarding this alignment or the associated coastal margin and no comments were made during the Draft consultation. The coastal margin that has been created seaward of the trail at Folkestone Warren (Map 4.7)

and towards Samphire Hoe (Map 4.2) is already, largely, Access Land with existing CROW rights. The land also contains a number of public rights of way, including one footpath that descends the cliff at Capel le Ferne and crosses the railway on an existing footbridge. There is also a vehicular access track from the Folkestone end of the Warren which is well used by local people and campers. Given this extensive access, we are not intending to add any additional signs to further promote access into the coastal margin or to deter established use.

The ability of Network Rail to access, maintain and monitor land is not affected by these proposals, as coastal access rights will not interfere in any significant way with their operational needs. Where there is potential for visitors to disrupt work the problems can often be avoided through informal techniques such as putting up a sign or asking for their co-operation face-to-face.

Local restrictions and exclusions are available if informal management cannot meet operational needs, and temporary diversions can also be put in place if needed. Directions for this purpose may be given inter alia on grounds of land management or public safety.

No changes to the Proposals are suggested as a result of this Representation.

Overview:

Organisation making representation: Deisa Delic – The Kennel Club

Unique Reference Number: [MCA\Folkestone to Ramsgate\R\5\RFK0294](#)

Overview (Map E & F pages 30 and 31); Chapter 1: RFK-S007 to RFK-S037 and Chapter 2: RFK-I005 to RFK-I009

Summary of Representation: Off lead access is the most important amenity for walkers with dogs.

Natural England Comment: See our comments in relation to those made by the Kennel Club on Chapters 1 and 2.

Unique Reference Number: [MCA\Folkestone to Ramsgate\R\6\RFK0313](#)

Overview page 27 and Area 7, 3 and 4, Maps E and F. Chapter 1, Route sections: RFK-S012 to RFK-S018, Map 1.2 (not specified in representation)

Summary of Representation: Land is chalk bed covered with marine sea weed and is very uneven. It would be difficult and dangerous to walk dogs on leads here.

Natural England Comment:

Please see our response to the comments raised in the summary of Chapter 1.

Unique Reference Number: [MCA\Folkestone to Ramsgate\R\8\RFK0291](#)

Overview Chapter 11, The Stour Estuary Map E p30 - Pegwell Bay Intertidal zone

Not specifically referenced: Chapter 1: RFK-S007 to RFK-S037 & Chapter 2: RFK-I005 to RFK-I009

Summary of Representation: Sandwich & Pegwell Bay

The representation is against the 'veto of CROW rights and complete blocking of ANYONE using the intertidal zone'. It says that people have used the Bay for centuries without affecting the birds. Coastal access is supposed to be about people, and whilst birds and other wildlife are important they are not the be-all and end-all. People shouldn't be dictated to regarding

where they can/can't go on open Crown Land.

Natural England Comment

The process and reasons for considering and proposing the restrictions and exclusion of coastal access rights to Sandwich & Pegwell Bay are as described under representations [MCA\Folkestone to Ramsgate\R\5\RFK0294](#) and [MCA\Folkestone to Ramsgate\R\7\RFK0313](#).

Concern about recreational disturbance has been increasing amongst the land managers and owners of the Bay, and this was highlighted to us by:

- i) the response to the Draft Consultation Report in late 2012,
- ii) the Natural England funded Kent Wildlife Trust survey and report of birds and recreational disturbance across the Bay that showed a *possible* link between people's activity and bird numbers and distribution, and
- iii) the BTO's Alert status on the turnstone population, showing a reduction in the population, with possible reasons for the decline including increased recreational disturbance.

This concern from owners of the land (Thanet District Council) and other interests in the National Nature Reserve resulted in our review of the original draft proposals. On advice from within Natural England, we developed the final Proposals.

Nature Conservation Assessment Reports:

Unique Reference Number: [MCA\Folkestone to Ramsgate\R\1\RFK0312](#)

Nature Conservation Assessment Report p32 Map F

Chapter 2, RFK-I001 to RFK-I009 (Maps 2.2, 2.3, 2.4)

Summary of Representation:

The cost for the trail is not justified, and outweighs the benefit. Specifically regarding Sandwich peninsula – the route as identified will require installation of 3 footbridges and 10 kissing gates, signage and drainage works. The new route here should use existing footpaths. Support is given to the restrictions and exclusions necessary for nature conservation around Sandwich & Pegwell Bay.

Natural England Comment:

Please see our comments in the summary of Chapter 2.

Organisation making representation: Thanet District Council

Unique Reference Number: [MCA\Folkestone to Ramsgate\R\9\RFK0110](#)

Nature Conservation Assessment Report p30 Map E and p32 Map F (not specifically referenced in representation)

Chapter 1, Route sections: RFK-S001 to RFK-S031 (Maps 1.1 – 1.3).

Summary of Representation:

Endorse and support the proposals and welcome the proposals to exclude coastal access rights within Pegwell and Sandwich Bay (SPA, SACs, Ramsar, NNR and SSSI designations). Welcome the proposals to engage with local users to establish the trail and restrictions.

Further clarification is required regarding the nature of the restrictions and exclusions as they

will not prevent 'current and new' recreation (non CROW rights), that could harm the wildlife interest of the Bay. The restriction in Area 7 of Pegwell Bay to keep dogs on leads is uncontrollable and therefore dogs could have an adverse effect on the bird interest.

A monitoring programme would be helpful to assess disturbance to European site interest from coastal access use and to monitor effectiveness of the recommended measures.

Account needs to be taken of the likely increase in recreational use and potential disturbance due to coastal access use. This will be exacerbated due to 'in-combination' pressures from current and proposed new housing development and people pressure.

Natural England Comment:

Please see our comments in the summary of Chapter 1.