

# Coastal Access – Hunstanton to Sutton Bridge lengths HSB1, HSB3 and HSB4



## Representations with Natural England’s comments

**September 2021**

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### 1. Introduction

This document records the representations Natural England has received on the proposals in length reports HSB1, HSB3 and HSB4 from persons or bodies. It also sets out any Natural England comments on these representations.

Where representations were made that relate to the entire stretch for Hunstanton to Sutton Bridge they are included here in so far as they are relevant to lengths HSB1, HSB3 and HSB4 only.

### 2. Background

Natural England’s compendium of reports setting out its proposals for improved access to the coast from Hunstanton to Sutton Bridge, comprising an overview and four separate length reports, was submitted to the Secretary of State on 25 November 2020. This began an eight-week period during which representations and objections about each constituent report could be made.

In total, Natural England received 24 representations pertaining to length reports HSB1, HSB3 and HSB4, of which 10 were 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 are reproduced in Section 4 in their entirety, together with Natural England’s comments. Also included in Section 4 is a summary of the 14 representations made by other individuals or

organisations, referred to as 'other' representations. Section 5 contains the supporting documents referenced against the representations.

### 3. Layout

The representations and Natural England's comments on them are separated below into the lengths against which they were submitted. Each length below contains the 'full' and 'other' representations submitted against it, together with Natural England's comments. Where representations refer to two or more lengths, they and Natural England's comments will appear in duplicate under each relevant length. Note that although a representation may appear within multiple lengths, Natural England's responses may include length-specific comments which are not duplicated across all lengths in which the representation appears. Where Natural England's comments and/or the text of the representation are the same for each length in which the representation appears, they will be produced in full only at the first occurrence. Thereafter, to save repetition Natural England's comments and/or the representation text will refer to the first occurrence.

### 4. Representations and Natural England's comments on them

## Length Report HSB1

#### *Full representations*

**Representation number:**

MCA/HSB1/R/4/HSB0824

**Organisation/ person making representation:**

Ramblers Association

**Route sections specific to this representation:**

HSB-1-S001 to HSB-1-S033, HSB-1-S034 to HSB-1-S039 and HSB-1-S040 to HSB-1-S042

**Other reports within stretch to which this representation also relates:**

N/A

#### **Representation in full**

**HSB-1-S001 to HSB-1-S033:** We support Natural England's proposed route.

**HSB-1-S034 to HSB-1-S039:** We propose that the route should follow the private road identified in the report. This meets the criterion of being close to the sea, whereas the route put forward in the report for this section does not. We do not consider the reasons for rejecting this route are valid. In particular, we do not think that the additional usage of this route if adopted as the England Coast Path will be noticeable when set against the level of usage of the existing holiday accommodation and camping site, and that privacy concerns are misplaced.

**HSB-1-S040 to HSB-1-S042:** We support Natural England's proposed route.

#### **Natural England's comments**

We welcome the support for the proposed route from HSB-1-S001 to HSB-1-S033 and HSB-1-S040 to HSB-1-S042.

For sections HSB-1-S034 to HSB-1-S039 the modification the Ramblers Association proposes follows a private sandy track, which we acknowledge is closer to the sea than our proposed route which sits landward of it and is therefore marginally less convenient for walkers.

We investigated aligning route section HSB-1-S038 along the private sandy track when formulating our proposals, and our findings are summarised in section 1.3.2 of Coastal Access Report 1.

We found that the private track provides the only access to around 80 properties. It is already lightly used by walkers, but this has led to issues for residents such as trespass onto the grass frontages and rear private areas of their properties. The track also continues into a camp site where owners leave their tents up over the summer months, and walkers here would need to follow a route between rows of tents.

Looking at the track in the context of the local area we found that the entrance to the track is next to ice cream and donut vendors, a café, parking, toilets and close to the beach. It is also very close to approximately 1,500 caravans on nearby sites, as well as other holiday homes. Alignment along the track would therefore lead to a very significant increase in walkers.

We also noted however that if we opted for a more landward alignment the private track would fall seaward of our proposed route and sit within the coastal margin. Walkers would therefore still gain a right of access to it under the legislation.

We carefully considered all these factors and concluded that whilst the Coastal Access Scheme allows us to align the coast path along private roads and through camp sites, we must also take into account the impact on the privacy of residents. Section 5.4.3 of the Scheme states:

*We will also consider in the preparation of our recommendations to the Secretary of State how our proposals may affect the privacy of people in the immediate vicinity of houses, hotels or other residences, and aim to strike a fair balance between these concerns and the interests of the public in having rights of access.*

In this instance we felt the impact on the privacy of the residents would be unacceptable and concluded this alignment would not strike the fair balance between public and private interests we must achieve under the legislation. Whilst the private track remains in the coastal margin and still attracts new coastal access rights under the legislation, we believe that, should our proposals be approved by the Secretary of State, most users will follow the signed route landward of it thus protecting the privacy of the residents along the track.

Our proposed route is supported by the South Beach Owners Association that represents many of the owners on the private track (see representation below).

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**Representation number:**  
MCA/HSB1/R/5/HSB0673

**Organisation/ person making representation:**

RSPB

**Route sections specific to this representation:**

HSB-1-S031 to HSB-1-S042 FP

**Other reports within stretch to which this representation also relates:**

The location reference to 'North Beach, Heacham and South Outmarsh' covers both Report 1 and Report 2 and so some of their points below mainly refer to Report 2, where they will be considered.

**Representation in full**

The RSPB did not submit one representation per Report but instead submitted a single form. Below is the part of the representation which refers to Report 1. The full rep has been reproduced in our comments on Report 2 to which the rest of it refers.

Thank you for consulting the RSPB about the draft proposals for an improved coastal access route from Old Hunstanton to Sutton Bridge. Having reviewed the draft proposal documents, the RSPB has **serious concerns** with the proposal between North Beach, Heacham and South Outmarsh where beach nesting birds, breeding waders and wintering waterbirds functionally linked to The Wash Special Protection Area will be present due to:

- the lack of ecological and visitor information presented in the documents;
- the limited management measures proposed to protect waders, wildfowl and specifically breeding ringed plover using this stretch of coast;
- the over reliance on signage to manage any current and future disturbance from users of the coast path;
- the lack of a formal monitoring programme to confirm assumptions and ensure adequate measures will be in place to manage any disturbance to sensitive species and habitats (reliance on Wetland Bird surveyors and ad hoc surveys will not provide reliable data when the majority of coast path users would be present); and,

Whilst the RSPB supports the principle of allowing people greater opportunities to enjoy the coast and its wildlife, this must be carefully managed to ensure conservation objectives are supported through the proposed scheme. This is particularly important where pressures from disturbance already exist, the impacts are well documented and any additional pressure as a result of improvements to the coast path could be significant. The coast path also offers an opportunity to address historic issues related to coastal access and disturbance to key features; we consider this is a missed opportunity in the currently proposed scheme in relation to beach nesting species. Our detailed comments are provided below.

Specific area of the representation on Report 1;

The area seaward and landward of the proposed coast path from HSB-1-SO31 to HSB-1-SO42 FP where there are areas of sand, vegetated shingle, and marshes.

**3. Potential impact on ringed plover**

The RSPB is particularly concerned for ringed plover that breed along this stretch of coast, which is an iconic species of the Norfolk Coast Area of Outstanding Natural Beauty (AONB) and listed on Appendix II of the Bern Convention as a Species requiring special protection.

Between 1984 and 2005, the number of ringed plover breeding in Norfolk declined by 63%, with a national decline of 47% between 1984 and 2007<sup>2</sup>. Subsequent coordinated counts since 2014<sup>3</sup> have raised further concerns that the decline has continued. Norfolk currently supports c.2.8% of the UK population of breeding ringed plover and the number of pairs breeding at Snettisham and Heacham make up c.12% of the Norfolk breeding population (*see Supporting Document 5d below*). The numbers breeding along this stretch of coast have declined over time and coincides with increased pressure from visitors to these locations. Liley & Sutherland (2007)<sup>4</sup> modelled change in ringed plover numbers based on changes in disturbance levels and determined the degree to which disturbance can depress the population. Of significant concern is the current population level is significantly lower than any of the model predictions. This is of serious concern for this well-studied ringed plover population. The proposed coastal access route offers an opportunity to implement appropriate management along this stretch of coast to better manage visitor disturbance, however, the RSPB is concerned that too much onus is being placed on signage alone to address problems. Monitoring proposals are limited and are unlikely to provide any meaningful data. The RSPB therefore considers the **proposals to manage impacts on this species are inadequate as currently set out.**

**2** Burton, N.H.K. & Conway, G. (2008). BTO Research Report No. 503: Assessing population change of breeding Ringed Plovers in the UK between 1984 and 2007.

**3** Coordinated counts were started as part of a package work initiated through the Little tern EU LIFE+ project and coordinated by [redacted] (NE Support Advisor, Scolt Head Island NNR). **4** Liley, D & Sutherland, W.J. (2007). *Predicting the population consequences of human disturbance for Ringed Plovers Charadrius hiaticula: a game theory approach*. Ibis 149 (Suppl.1), 82–94

#### **4. Appropriately reflecting visitor numbers in management and monitoring decisions for this stretch of coast path, especially following 2020 season**

At present no information is presented to demonstrate how many people currently access parts of the route, or if the designation of the route will increase the number of walkers. The Habitats Regulations Assessment (HRA) does suggest small increases are possible (for example, Section D3.1, p.49) but does not define what “small” might actually mean for this sensitive area. It would be useful to understand how the improved coastal access has affected other areas and therefore potential changes to visitor numbers along the Old Hunstanton to Sutton Bridge stretch of the Coast Path.

It will also be important to understand whether people **will** adhere to the signage being planned to keep people to the coast path route and away from sensitive habitats and species. We recommend strongly that further consideration is given to support wardens on the ground and a detailed three to five-year programme of monitoring be put in place as part of the project (see detailed comments on proposed mitigation measures in Section 5 below) [not reproduced here as per Natural England’s note in red text at the start of the representation]. Such monitoring during the early stages of the project would help to determine if the signage is effective, if adjustments are required, and if additional mitigation is necessary.

During 2020, there was a large increase in visitor numbers to sites in North and West Norfolk. This included significant increases in visitors accessing the RSPB Snettisham reserve. These were often new visitors, many from Dersingham and nearby villages who were exploring the local area for the first time. Once they had found a good walking and cycling route, they spread their findings on social media, and this meant that the ringed plovers breeding at Snettisham and Heacham faced a significant increase in disturbance. The evidence suggests that now these routes have been found, and especially given the encouragement to explore the area by tourism bodies, it must be expected that the higher levels of users of the coast will continue.

The increased number of visitors must be factored into infrastructure requirements, maintenance costs and, most importantly, monitoring requirements to confirm usage and impacts and ensure any adverse effects on integrity will be avoided.

## **Natural England's comments**

We welcome the RSPB's comments in relation to the proposals and our response to their concerns is given below.

### Response to potential impact on ringed plover

Whilst we very much recognise the pressure that many nesting ringed plover are under, the England Coast Path (ECP) Habitat Regulations Assessment (HRA) and Nature Conservation Assessment (NCA) must assess the impact of the ECP itself (as the plan or project being assessed) rather than attempting to address all the current disturbance issues in place. In this case, as breeding ringed plover are not a designated SPA feature, they were assessed in the NCA, rather than the HRA.

The RSPB suggests '*The proposed coastal access route offers an opportunity to implement appropriate management along this stretch of coast to better manage visitor disturbance*' and says that a long-term decline in ringed plover numbers '*coincides with increased pressure from visitors*'. The RSPB says '*The coast path also offers an opportunity to address historic issues related to coastal access and disturbance to key features; we consider this is a missed opportunity in the currently proposed scheme in relation to beach nesting species*'

We though consider how to address the potential issues from the ECP rather than, for example a recent example of wider recreational disturbance shown in a video of quad bikes on the beach.

Ringed plover are a mobile species and their nest sites can change over time in relation to patterns of accretion and erosion of the beach, and other pressures.

The HRA and NCA consider the impact of the ECP proposal and access in this area has been changing since the first hotel was built in Hunstanton in 1846. The beaches at Heacham are a popular attraction with approximately 1,500 caravans on nearby sites, as well as other holiday homes. Car parks also make the beaches easily available for day visits. Toilets and a café are available close-by. The concrete promenade from Hunstanton is already a popular walking route. The Snettisham Beach area has over 400 caravans and a 300-space car park.

Because the area around Heacham is such a popular seaside centre we do not believe that ECP users would create an additional threat to birds as the route is proposed on existing well used footpaths and promenade.

Natural England's approach is to ensure the ECP avoids adding to this existing pressure by routing the path inland, away from key ringed plover nesting habitat. We will also take the

opportunity to mitigate some of the existing recreational disturbance by use of information signs about the conservation importance of the Wash. The HRA gives three locations; at Hunstanton where the England Coast Path joins the promenade, on the promenade by The Boat House Café, Hunstanton and close to the seawall at the end of Jubilee Road, Heacham but we will work to obtain advice on the best positions in relation to other projects and mitigations e.g. GIRAMS (see below).

The RSPB's own data (*See Supporting Document 5b below*) records breeding ringed plover at Heacham only in 2016, 2017 and 2018 from surveys done between 2008 and 2020.

It is not the role of the ECP to manage existing issues though we will always look for ways to implement mitigation measures to address historic issues where we can, proportionate to the coast path effects.

Other colleagues in NE will of course continue to engage with RSPB on improving outcomes for ringed plover, but this will not be led by ECP. Such projects include the ringed plover at Snettisham and Heacham being part of a NE Species Recovery Project that is jointly funded by NE, RSPB and Footprint Ecology as part of a three-year Seabird Recovery Network project. RSPB will also be producing more detailed 'best practice' guidance for site managers with more detail of fences, signage etc. This will help address the existing pressures on breeding birds that are beyond the scope of the ECP.

The RSPB says that *'proposals to manage impacts on this species are inadequate as currently set out'*. Natural England's response to the possibility of ringed plover disturbance has been recorded in the NCA in that the ECP proposals are for an inland route avoiding 2km of beach which is the majority of (currently) suitable plover nesting habitat. This decision has been reached following discussions within Natural England and with partners and shows the 'precautionary' approach towards the possible impact. In addition the ECP route has avoided creating routes from the path to the beach.

The RSPB says about *'limited management measures proposed to protect waders and wildfowl'*. NE staff recognised concerns about birds on functionally linked areas seaward of the path at Heacham and have placed a nature conservation access restriction on grazing marsh, creating a buffer between the path and the beach.

For the rest of the area of concern the proposal is on an existing path and public footpath landward of the beach and the descriptions of each section are given below;

**HSB-1-S034 to HSB-1-S039**; alignment away from the beach, on a route that is up to 400m inland. This is, in part a response to potential ringed plover nesting habitat on the beach.

**HSB-1-S040** is an existing walked route landward of the beach. HSB-1-S040 to HSB-1-S042 are within the Snettisham Coastal Park that offers free and open access to 47 hectares (115 acres) of beach, grass, dunes and scrub.

**HSB-1-S041** is mainly on a hard-surfaced flood defence bank and so is likely to be the preferred walking surface compared to the soft sand on the beach.

**HSB-1-S042** is on a public footpath up to 50m landward of the sandy beach. The car park landward of HSB-1-S042 has 300 spaces and serves the visitors to Snettisham Beach and the Coastal Park. There are over 400 caravans on nearby sites. This area currently has a high recreational use, with residential and day visitors likely to spend time on the beach.

#### Response to reflecting visitor numbers in management and monitoring decisions

RSPB raises concerns about increased and irresponsible access during 2020. We have already said that it is not the role of the ECP programme to solve other existing recreational issues.

The management of the ECP following commencement of the new rights is the responsibility of Norfolk County Council, who have been managing the existing National Trail for 35 years.

During that time there has been an increase in usage and the Council uses people-counters as one of their tools to identify visitor pressure. Should wider circumstances affecting the site change at any time in the future, Coast Path management can be adapted as necessary to avoid or reduce any possible negative impacts on sensitive sites. A key feature of ongoing National Trail management is to work closely with relevant landowners and managers to identify and resolve any issues that might arise at an early stage. Natural England will continue to be involved in the National Trails Partnership, through representation by National Trails Partnership Managers and so will be made aware of concerns that NCC might raise about increased access.

The RSPB is concerned about reliance on signage rather than monitoring and this point is mainly referring to Report 2, where it will be considered.

The RSPB is concerned about the effectiveness of signage and we will consider if there are any lessons to be learnt from the RSPB and NE co-branded signs at Winterton advising on little terns and responsible dog management.

The RSPB says '*At present no information is presented to demonstrate how many people currently access parts of the route or if the designation of the route will increase the number of walkers*'. We refer to the HRA (pg 44, 45, 55, 64 and 74) where we used data from Footprint Ecology visitor surveys.

Some parts of the route are already very popular e.g. Hunstanton Promenade and so the effect of additional users is likely to be minimal. The beaches at Heacham and Snettisham will continue to be popular and ECP signage will have a positive impact in guiding responsible behaviour. In the area covered by this report the proposals for the Coast Path will not substantially alter the present access situation and so we see no need for additional monitoring.

The RSPB has shown concern about 2020 increased recreational pressure and it is a wider issue around the Norfolk coast. In Norfolk a Green Infrastructure (GI) and Recreation Avoidance Mitigation Strategy (RAMS) is being discussed by the Councils. This GIRAM Strategy is funded by contributions from housing development and identifies a detailed programme of county wide mitigation measures aimed at delivering the necessary mitigation to avoid adverse effects on the integrity of the Habitat Sites. It is not designed to deal with existing recreational impact issues just those of future predicted impacts, though it will take opportunities to address historic issues, with the aim of achieving no net increase in disturbance.

In Norfolk the GIRAMS Project Steering Group was formed of all Local Planning Authorities and included Natural England.

The RSPB has been represented at the workshops listed in the GIRAM Strategy.

This is an example of how there can be a wider response to recreational disturbance rather than the narrowly focussed concerns about the ECP.

Outputs of the GIRAM Strategy include:

- *an audit of signage at Habitat Sites, including interpretation as well as appropriate access points, and a budget for new interpretation boards*
- *Working with landowners and partners will be crucial for any fencing needed to protect existing breeding sites e.g. for Little Tern & Ringed Plover populations on the coast,*



- *Bird monitoring surveys will need the RAMS team to work closely with landowners and partners to map key roosts and feeding areas;*
- *Monitoring of sensitive habitats, car park counts, visitor surveys and access management assessments.*
- *setting up a dog related project for the county's Habitat Sites.*

The Strategy states:

### 3.3.3.1 Visitor engagement

*'educational materials and props and interpretation for the Norfolk GI and RAMS website and social media, which will need to dovetail with other information e.g. site notice boards & England Coast Path.*

The ECP has had good experience elsewhere (N Kent, the Solent, Essex, etc) of dove-tailing the measures we put in place on the ECP (e.g. signage, interpretation, fencing where appropriate) with the efforts of RAMS, e.g. wardening. This has generally worked well, particularly in areas outside reserves that are currently un-wardened. We look forward to working closely with the Norfolk GIRAMS project in due course.

In conclusion we acknowledge the very valid concerns of the RSPB, which we share. These concerns are, in part the reason why the proposed alignment for the ECP is inland of much of the suitable ringed plover breeding habitat and, where it is closer to the beach it is on existing access and public footpaths, landward of the beaches.

RSPB is concerned about an increase in usage of sites that causes disturbance. Directional ECP signage will give confidence to new users that the National Trail route they are following is permitted and part of a recognised walk. We and RSPB are part of the Norfolk GIRAMS project to mitigate for new recreational disturbance from planned development.

The historic and current decline in ringed plover numbers has been recognised at Snettisham and Heacham and they are part of a Species Recovery Project that is jointly funded by NE, RSPB and Footprint Ecology. RSPB will also be producing management guidelines for ringed plovers on beaches, using the plover situation at Snettisham to create national guidelines. This will help address the existing pressures on breeding birds that are beyond the scope of the ECP.

### **Relevant appended documents (see section 5):**

- A. Number of pairs of ringed plover breeding at Snettisham between 2008 and 2020
- B. Map of plover habitat and distribution from discussion between Natural England's Responsible Officer and RSPB's Sites Manager North West Norfolk reserves

### ***Other representations***

### **Representation ID:**

MCA/HSB Stretch/R/1/HSB0834

**Organisation/ person making representation:**

British Horse Society

**Name of site:**

All of Report 1

**Report map reference:**

HSB 1a to HSB 1e

**Route sections on or adjacent to the land:**

HSB-1-S001 to HSB-1-S042

**Other reports within stretch to which this representation also relates**

HSB 2, HSB 3 and HSB 4

**Summary of representation:**

The British Horse Society is an equestrian charity which represents the 3 million horse riders in the UK. Nationally equestrians have just 22% of the rights of way network. In Norfolk, they have just 33.7% of the rights of way network, increasingly disjointed by roads which were once quiet and are now heavily used by traffic resulting from development within the County.

Road Safety is a particular concern to equestrians, who are among the most vulnerable road users.

The British Horse Society believe that Natural England should be seeking to make the England Coast Path between Hunstanton and Sutton Bridge a route accessible for equestrians. The British Horse Society believes that historical evidence indicates that the majority of this route is under recorded or unrecorded, this should be taken into consideration when creating this new route on the ground.

Natural England should be seeking higher rights along the route with definitive Rights of Way showing footpath status this should be upgraded or dedicated as bridleway status.

This is a fantastic opportunity to increase the equine tourism sector throughout Norfolk, developing horse tourism will help and support an addition revenue stream for Natural England and for the Norfolk rural economy as a whole.

Establishment of the trail should be for equestrians as well as pedestrians and cyclists, the costing estimated by Natural England to date should be revisited to ensure this covers any works required to remove barriers etc. Where new or replacement gates are proposed along the route, they should meet our attached specifications to allow equestrian access as well as access for those with push chairs and wheelchairs to conform with the Equality Act 2010.

When assessing the route from Hunstanton to Sutton Bridge for its suitability for equestrians the width must be considered. A useable width is likely to be 4 metres (bridleway) or 5 metres (byway) to avoid such as overgrowth reducing the useable width between cuts, particularly adjacent to barbed wire or thorny plants, or a horse-drawn vehicle having to avoid ruts.

BHS hopes that Natural England will take this opportunity to address the disjointed nature of Norfolk's Right of Way network in these new opportunities and ask that the Hunstanton to Sutton Bridge route should include:

a. Recognition of equestrians as vulnerable road users

BHS asks that the England Coast Path includes Norfolk's equestrians as vulnerable road users, to ensure that their needs are considered equally alongside those of pedestrians and cyclists.

b. Inclusion of equestrians in the Norfolk Local Transport Plan

The term 'Active Travel' applies to journeys undertaken for a range of purposes, whether to reach a place of work or local amenities, or for recreation. BHS therefore suggests that horseriding should be included within the Coast Path and would welcome the opportunity to contribute the development of this document.

c. Equestrians to be included in any shared-use routes, wherever possible

In order to maximise opportunities within Norfolk to help provide more off-road links for equestrians there should be support for the automatic inclusion of horse riders on shared offroad routes, unless there are specific reasons why this is not possible.

d. Reference to the Norfolk's Highway Advice for Developers

Norfolk County Council has developed this guidance for planners and developers in response to feedback from local authorities, which indicated that they would welcome more information about how they can include equestrians in their work, engagement and consultation. We would like to work in partnership to develop this further.

We would urge Natural England to incorporate the principles set out in this guidance into their plans: most particularly, that there is an opportunity to include equestrian use to provide safe off-road access where appropriate.

e. Reference to Norfolk's Access Improvement Plan

This document addressed the issues faced by equestrians in Norfolk - a sparse network of bridleways, and other routes compared to the network of footpaths. It states, 'A number of landowners across Norfolk have provided permissive paths across their farm-land close to local villages.' This shows the willingness of landowners throughout Norfolk to allow equestrian access over their land, therefore Natural England should ensure the entire route from Hunstanton to Sutton Bridge includes equestrian users.

Equestrianism is a popular activity in this part of Norfolk, and one which contributes significantly to the local economy. The equestrian community in Norfolk currently has many difficulties in finding safe access within the area, as identified in Norfolk's policies. Many of these issues could be addressed and resolved through good planning of future routes. BHS hopes that the England Coast Path: Hunstanton to Sutton Bridge will include equestrians for its entirety.

**Natural England's comment:**

The Coastal Access legislation should not be seen as a panacea for existing problems within the rights of way system. The new legislation does not, for instance, give Natural England the power to directly address any outstanding issues with the Definitive Map.

Natural England's duty under Part 9 of the Marine and Coastal Access Act 2009 is to create clear and consistent public rights along the English coast for open-air recreation on foot. On some sections of coast, existing rights will apply as well as or instead of coastal access rights, such as the right to ride a horse or bicycle on a bridleway or along a permissive route permitted by the landowner.

Natural England does have the power to remove or relax the 'national restrictions' under Schedule 2 to the CROW Act. This could in effect be used to grant new access rights for people on bicycles or horseback. However, it has not been our programme's policy to actively pursue opportunities for such arrangements and we only ever make such a direction if we were approached by the relevant landowners to do so. In this instance we were not approached by any stakeholders seeking higher rights at the outset of the stretch project and no landowners asked us to consider proposing higher rights in our discussions with them.

### **Relevant appended documents (see Section 5):**

C. Documents detailing infrastructure specifications

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#### **Representation ID:**

MCA/HSB Stretch/R/2/HSB0822

#### **Organisation/ person making representation:**

Water Management Alliance (Internal Drainage Board) – [redacted]

#### **Name of site:**

All of Report 1

#### **Report map reference:**

HSB 1a to HSB 1e

#### **Route sections on or adjacent to the land:**

HSB-1-S001FP to HSB-1-S042FP

#### **Other reports within stretch to which this representation also relates**

HSB 2, HSB 3 and HSB 4

#### **Summary of representation:**

Appreciation that there has been engagement between the IDB and Coast Path staff.

Reminder that the proposals are partly within the Internal Drainage District (IDD) of the King's Lynn Internal Drainage Board (IDB) and therefore the Board's Byelaws apply. The Board's byelaws and maps of 'Adopted Watercourses' (watercourses that receive maintenance) are on their website.

IDB said that the currently proposed route is close to Board drainage infrastructure including several pumps and multiple Adopted Watercourses (list supplied). Any works (including posts and gates) within 9 metres of said infrastructure generally require consent to relax Byelaw 10

(no works within 9 metres of the edge of drainage or flood risk management infrastructure), however officers believe that in this case an exemption may be more suitable in accordance with the Boards Byelaw 26.

A reminder was given by the IDB that should the proposal require any works to alter a watercourse (adopted or riparian), through culverting, in-filling or similar, consent (or an exemption under Byelaw 26) will be required under the Land Drainage Act 1991 (and Byelaw 4).

The IDB offered to walk the route with a Natural England staff member to discuss the above if deemed useful. They also wished to remain involved in the development of any works within 9m of our infrastructure so that they might consider and discuss options and their implications.

**Natural England's comment:**

Natural England appreciates the IDBs engagement in the development of our proposals and will work closely with them on the implementation of the coast path. We also very much welcome their offer of continued involvement and advice.

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**Representation ID:**

MCA/HSB1/R/3/HSB0836

**Organisation/ person making representation:**

Cycling UK: [redacted] - National Off-Road Advisor

**Name of site:**

All of Report 1

**Report map reference:**

HSB 1a to HSB 1e

**Route sections on or adjacent to the land:**

HSB-1-S001FP to HSB-1-S042FP

**Other reports within stretch to which this representation also relates**

HSB 2 and HSB 3

**Summary of representation:**

A significant stretch of this route is physically suitable for use by cyclists - there would be a real opportunity to provide cycle and/or horse access along the proposed route - or alternatively to utilise some of the other existing surfaced tracks in the area for shared use in all weathers.

Cycling UK notes that their suggested route (shown in Section 5) would be almost entirely open for disabled users, which the currently proposed route is not suitable for.

Cycling UK is developing new Cycle Hubs across Norfolk as part of the EXPERIENCE tourism project in conjunction with Norfolk County Council, to boost visitor numbers and equip local businesses to better attract cycle tourists. It is exploring potential hub locations along the north west Norfolk coast and will promote local cycle routes and itineraries as part of this. Cycling

access on this stretch of England Coast Path would allow cyclists to visit local tourism businesses (who Cycling UK is training to be Cycle Friendly as part of this project) and promote the appeal of the regional identity of north west Norfolk to the cycling community.

**Natural England's comment:**

We acknowledge the desirability of creating off road routes for cyclists and understand that Norfolk County Council is currently working to develop a cycle route between Hunstanton and King's Lynn using an old (inland) railway line.

Natural England's duty under Part 9 of the Marine and Coastal Access Act 2009 is to create clear and consistent public rights along the English coast for open-air recreation on foot. On some sections of coast, existing rights will apply as well as or instead of coastal access rights, such as the right to ride a horse or bicycle on a bridleway or along a permissive route permitted by the landowner.

Natural England does have the power to remove or relax the 'national restrictions' under Schedule 2 to the CROW Act. This could in effect be used to grant new access rights for people on bicycles or horseback. However, it has not been our programme's policy to actively pursue opportunities for such arrangements and we only ever make such a direction if we were approached by the relevant landowners to do so. In this instance we were not approached by any stakeholders seeking higher rights at the outset of the stretch project and no landowners asked us to consider proposing higher rights in our discussions with them.

**Relevant appended documents (see Section 5):**

- D. Map and description of suggested route option between South Beach Heacham and King's Lynn
  - E. Description of alternative route supplied by Cycling UK.
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**Representation ID:**

MCA/HSB1/R/2/HSB0482

**Organisation/ person making representation:**

Heacham South Beach Owners Association - representing 36 properties on South Beach

**Name of site:**

South Beach Heacham

**Report map reference:**

HSB 1c, HSB 1d and HSB 1e

**Route sections on or adjacent to the land:**

HSB-1-S034, HSB-1-S035, HSB-1-S036, HSB-1S037, HSB-1-S038, HSB-1-S039

**Other reports within stretch to which this representation also relates**

N/A

**Summary of representation:**

Support for the proposed route as the best route to protect the wildlife on the beach, protect the private road on South Beach from becoming a promenade from the day trip car park, and the security and safety of property owners on South Beach. The Natural England staff have done an excellent and thorough job and have carefully considered the feelings of the local people most directly affected. The proposed route gives great elevated views of the sea shore and is to be supported.

**Natural England's comment:**

Natural England welcomes this support.

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**Representation ID:**

MCA/HSB1/R/1/HSB0369

**Organisation/ person making representation:**

[Redacted]

**Name of site:**

All of Report 1

**Report map reference:**

HSB 1a to HSB 1e

**Route sections on or adjacent to the land:**

HSB-1-S001FP to HSB-1-S042FP

**Other reports within stretch to which this representation also relates**

HSB 2 and HSB 3

**Summary of representation:**

[Redacted] fully supports the proposals of creating a public right of way along the proposed route between King's Lynn and Hunstanton that currently do not exist. He believes this will be a major attraction and will help the local economy with tourism. It will also provide a fantastic amenity for residents to explore new areas of the local environment which are currently "offlimits" with no public access. He is a keen walker and welcomes the opportunity to walk this stretch of coast where no such opportunity has previously existed.

**Natural England's comment:**

Natural England welcomes this support for the proposals.

## Length Report HSB3

### *Full representations*

**Representation number:**

MCA/HSB3/R/10/HSB0823

**Organisation/ person making representation:**

Country Land and Business Association – [redacted] – *National Access Advisor*

**Route section(s) specific to this representation:**

Rep says 'The land from Wolferton Creek to Sutton Bridge' (which covers Reports 2, 3 and 4). In its entirety Report 3 is HSB-3-S001 to HSB-3-S051

**Other reports within stretch to which this representation also relates:**

Reports HSB 2 and HSB 4

**Representation in full**

The CLA have looked at this section of coast and would ask the Secretary of State to take account of the concerns landowners have in respect of sections HSB2, HSB3 and HSB4: Natural England is required to achieve a fair balance and in particular the following issue has been drawn to our attention:

Report HSB 4 West Lynn Ferry to Sutton Bridge section 4.2.18 states, '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'.

In addition to 'roll-back,' landowners would like to see flood defence improvements included. This will ensure that future flood defence improvements are not hindered by the trail.

Natural England and the Environment Agency should be aware as an example, during the Wrangle bank improvement in 2018, the sea bank had to be heightened, widened and reprofiled to protect the land behind it. The sea bank at Wrangle was the site of a public footpath, and this had to be temporarily closed. Firstly, during the works period on the grounds of safety and secondly for 18 months following completion of the works to allow the essential grass seeding to take and to prevent erosion to the additional soil put on top of the bank which increased its height. If the public had been allowed access on to the bank without this delay, a lot of the works carried out could have been damaged or undone.

The Coastal Access Scheme 'the Scheme' (4.10.3) refers to defences no longer actively maintained however, this stretch is fortunate and unusual in that the landowners and occupiers, when necessary, do and will continue to carry out occasional, vital maintenance. Without maintenance of this infrastructure, there would be devastating implications, not just for the immediate landowners and occupiers but far further inland given the nature of the landscape. To achieve a fair balance, maintenance must be possible.

Chapter 8 of the Scheme covers potential issues and likely range of solutions. Landowners and occupiers are not suggesting the proposed alignment is not suitable, merely that arrangements for the creation of the Coastal Path must allow for its closure for periods of time required to facilitate works being carried out to the sea bank and flood defences. During these times an alternative temporary route could be negotiated with landowners and occupiers to circumnavigate the affected section.

In the event of a temporary or permanent route re-alignment, there would need to be a full consultation with those landowners and occupiers affected to agree terms.

All the sea banks around The Wash will need to undergo a similar process in the forthcoming years and the creation of the Coastal Path cannot be allowed to be an obstacle to these essential works.



## Natural England's comments

We recognise the possible need to close the Coast Path because of planned or emergency work on the bank and flood defences. Future flood defence improvements will not be hindered by the trail.

The Scheme says;

*8.21.3 Natural England will work with those responsible for flood and coastal risk management to ensure that the coastal access proposals do not compromise essential functions.*

After the route is open discussions about works would take place with the highways authority that maintains the Coast Path (in Norfolk there is already a dedicated National Trails Officer). Where work is required to take place on land subject to coastal access rights, an application can be made to Natural England who will consider temporarily excluding access to the land for land management reasons. If an extended period of closure is needed, then this is discussed along with reasons for the need for the closure. The highways authority would also consider the need to close any affected rights of way.

In addition, the Scheme says;

*6.4.6 In all circumstances where access to the 'ordinary' route would have to be excluded at certain times, we will aim to provide a temporary or alternative route provided that this can be done at reasonable cost.*

We can confirm that in the event of a temporary or permanent route re-alignment, the affected landowners/occupiers would be fully consulted.

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### Representation number:

MCA/HSB3/R/7/HSB0839

### Organisation/ person making representation:

National Farmers Union – [redacted] - *Flood Management & Access Policy Adviser*

*(Also see the NFU rep below from the NFU local team)*

### Route section(s) specific to this representation:

Representation says 'the land from Wolferton Creek to Sutton Bridge' (which covers Reports 2, 3 and 4). In its entirety Report 3 is HSB-3-S001 to HSB-3-S051

### Other reports within stretch to which this representation also relates:

Reports HSB 2 and HSB 4

### Representation in full

The NFU have noted the Wash Frontage Group representation on section 4.2.18 and the ability of Natural England to change the route of the trail without approval from the Secretary of State, and in response to coastal change.

The group make a very valid point about including flood defence improvements, and temporary closure as a requirement. They specify the Wrangle Bank improvement that was carried out in

2018 as an example of the need. We therefore fully support that Wash Frontage Group representations, and in particular the need for full consultation with landowners and occupiers in the event of a temporary or permanent route re-alignment to agree terms. Equally we support the group's representation that states that "The arrangements for the creation of the Coastal Path must allow for its closure for periods of time required to facilitate works being carried out to the sea bank and flood defences."

The Wash Sea banks are a strategic asset and vital to the protection of a huge area of Fenland Lincolnshire in terms of people, communities, economy and environment. Any future strategic plan for the area, such as Water Resources East Future Fenland Plan (see page 16 of the WRE Initial Water Resources Position Statement, will include upgrading and strengthening these assets, and works to do that should not be hindered by the creation of a coastal path in future years. Instead, we would like a similar approach to that witnessed in Wrangle. The works carried out to raise the seawall at Wrangle has led to an improved experience for users and we recommend that a similar approach be taken for the seawall that surround the Wash as this will not only provide wide-coverage flood protection against the increasing risk of sea-level rise but will also provide a safer route for users.

### **Natural England's comments**

Please refer to the response to the representation above from the CLA [representation MCA/HSB3/R/10/HSB0823].

### **Relevant appended documents (see section 5):**

F Water Resources East - Initial Water Resources Position Statement

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**Representation number:**  
MCA/HSB3/R/6/HSB0840

**Organisation/ person making representation:**  
National Farmers' Union – [redacted] *NFU East Midlands*

*(Also see the NFU rep above from national NFU)*

**Route section(s) specific to this representation:**  
Representation says 'the land from Wolferton Creek to Sutton Bridge' (which covers Reports 2,3 and 4). In its entirety Report 3 is HSB-3-S001 to HSB-3-S051

**Other reports within stretch to which this representation also relates:**  
Reports HSB 2 and HSB 4

### **Representation in full**

We have noted the Wash Frontage Group representation on section 4.2.18 and the ability of Natural England to change the route of the trail without approval from the Secretary of State, and in response to coastal change.

That group make a very valid point about including flood defence improvements, and temporary closure as a requirement. They specify the Wrangle Bank improvement that was carried out in 2018 as an example of the need. We therefore fully support that Wash Frontage Group representations, and in particular the need for full consultation with landowners and occupiers in the event of a temporary or permanent route re-alignment to agree terms.

Equally we support their representation that states “The arrangements for the creation of the Coastal Path must allow for its closure for periods of time required to facilitate works being carried out to the sea bank and flood defences.”

The Wash Sea banks are a strategic asset and vital to the protection of a huge area of Fenland Lincolnshire in terms of people, communities, economy and environment. Any future strategic plan for the area, such as Water Resources East Future Fenland Plan (see page 16 of the WRE Initial Water Resources Position Statement, will include upgrading and strengthening these assets, and works to do that should not be hindered by the creation of a coastal path in future years.

### **Natural England’s comments**

Please refer to the response to the representation above from the CLA [representation MCA/HSB3/R/10/HSB0823.

### **Relevant appended documents (see section 5):**

F Water Resources East - Initial Water Resources Position Statement

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### **Representation number:**

MCA/HSB3/R/4/HSB0824

### **Organisation/ person making representation:**

Ramblers Association – [redacted]

### **Route section(s) specific to this representation:**

HSB-3-S001 to HSB-3-S051 and a route that would replace HSB-3-S002 to HSB-3-S020

### **Other reports within stretch to which this representation also relates:**

Reports HSB 1 and HSB 2

### **Representation in full**

HSB-3-S001: We support Natural England’s proposed route.

HSB-3-S002 to HSB-3-S020: The route proposed in the report runs well inland, failing to meet the criterion of being close to the sea. Although much of it is a pleasant enough field edge, (1) the countryside is unexceptional, (2) the final exit into the urban area is across a field which, when last walked, had not had the path made across its rough surface, and (3) the path exits onto an unappealing industrial estate road and then along the busy A1078, which has a very limited footway on the eastern side (there is more on the other side, but it then requires crossing the road and crossing back later).

We propose instead that the route should use the northern end of King’s Lynn FP2 and then BOAT1, then Cross Bank Road to join John Kennedy Road. This route follows close to the river, and, as it approaches King’s Lynn, offers a fine view of the town and riverside. It then

runs through the dock area, and although this is clearly industrial in nature, it offers views of interest because of the dock activity.

The part of this route along BOAT1 has been rejected because of reported concerns raised by Norfolk County Council relating to a wind turbine. Yet the route remains a public right of way, so clearly the anticipated danger is not thought serious enough to require action. For walkers coming from the north, this section provides a welcome return to visibility of the water, a sight denied them for the previous 5 miles. To follow the route proposed in the report means a further 3 miles before seeing the water. We note that along much of its length, including the part running past the turbine, there is a path running at a lower level (and even closer to the river), at a safe distance from any 'general failure' of the turbine that might be anticipated; we understand that this path may be flooded at times of exceptional high tide, but this is, by its nature, rare. At BOAT level, we note that there is a turning circle that enables nervous walkers to keep their distance from the turbine.

The section along Cross Bank Road is also rejected on the advice of Norfolk County Council, this time on the grounds that it is 'unsafe for walkers due to a narrow road without pavement and lorry movements ...'. We do not agree that the road is narrow; along some of its length it has white centre lines marking out traffic lanes for both directions. Neither is it entirely without pavement: there is a pavement along the section of the road nearest the town, and markings to reserve space for walkers across the bridge (together with warning signs about pedestrians which clearly indicate that they are expected in the area). There is no real pavement along the part of the road furthest from the town, but we expect this will carry the least traffic, as much will have turned off at earlier points.

The road is within the dock area, where traffic will be comparatively slow moving (there is a 20mph speed limit, minimising the threat it presents). We would also anticipate that the majority of the traffic will be from regular users, who can be (and already are) warned of the likelihood of meeting walkers, and so take appropriate care. This route would also offer the added interest of walkers being able to view the docks themselves, rather than being steered away from them.

HSB-3-S021 to HSB-3-S051: We support Natural England's proposed route.

### **Natural England's comments**

We welcome the Ramblers' Association support for part of this route.

We accept that the proposed route is not close to the river from section HSB-3-S002 to HSB3-S020, but we believe we have appropriately considered all the alignment options available to us. These options and our reasons for not proposing them are given in section 3.3.2 of Coastal Access Report HSB 3: South Outmarsh, Kings Lynn to West Lynn Ferry.

The Ramblers note that proposed route sections HSB-3-S002 to HSB-3 S008 follow a crossfield Public Right of Way (PRoW) which currently has not been marked on the ground. This PRoW has been unofficially moved by the landowner and Norfolk County Council is aware of the situation and have visited the site. The Ramblers go on to note the limited width footway on one side of John Kennedy Way. It is for this reason that we have proposed the wider pavement on the other side of the road, but we accept that this does involve crossing the road. In making this choice we were satisfied that both crossings are safe for walkers because they have a central island and dropped kerbs with either traffic signal or pedestrian controlled lights.

The Ramblers advise that they would prefer the ECP route to follow the Byway Open to All Traffic (BOAT) alongside the river and we did consider that option. We rejected this route because it would go very close to recently-built wind turbines, with associated safety concerns

with the change in status to a National Trail with higher usage. The Ramblers then suggest that it follows a road through the Port of King's Lynn. We consider these points in more detail below.

## Turbines

We carefully considered whether to propose a route along the River Ouse using the BOAT, with the edge of the track surface being 11m from the turbine tower (shown in a Ramblers photo below)

The Coastal Access Scheme 2013 does not give any specific guidance on wind turbines, but the public interest criteria we must have regard to in proposing the route of the coast path given in Chapter 4 state that the route should be safe, convenient and pleasant for walkers.

In assessing how the option of following BOAT 1 would meet the public interest criteria in the Scheme, we gave careful consideration to a number of factors and evidence;

- a. Firstly, some councils have a policy about turbines and public rights of way. Norfolk County Council does not have a policy.
- b. We found detailed guidance in Central Bedfordshire Council's 'Wind Turbines near Public Rights of Way-Working Practice Guidance Note' that states;

*'Planning Policy Statement 22 on Renewable Energy (PPS 22) [Companion Guide] states "...there is no statutory separation between a wind turbine and a public right of way. Often, fall over distance is considered an acceptable separation, and the minimum distance is often taken to be that the turbine blades should not be permitted to oversail a public right of way..."*

The document concludes;

*6.4 The distances recommended below are desirable safety minima. Where wind turbines are situated close to well established local routes, routes noted for their views, or routes of regional or national importance, officers should consider extending the minimum distance to provide an appropriate and enhanced degree of separation. This is to protect both the character of the right of way and to reflect the increased amount of traffic along it.*

*6.5. Where an enhanced degree of separation cannot be obtained due to the spatial separation of turbines required within a site, consideration should be given to stipulating a planning condition that requires the diversion of the right of way to a more suitable location to be completed prior to construction of the wind turbines.*

*6.6. As working practice guidance for Area Rights of Way Officers in responding to planning applications, the following should be considered as the desirable minima for a wind turbine exclusion zone.*

*Recommended minimum exclusion distances for high use or nationally or regionally important routes;*

*Footpath – tip height x 2*

*Bridleway or byway – tip height x 3 or x 4*

We therefore applied the recommendations of the Council's Note in relation to the ECP National Trail in Norfolk.

- c. Whilst PPS 22 has now been withdrawn some councils still use tip height as the minimum separation distance, and Norfolk Trails, who will take on the management and maintenance of the trail, support the conclusion of the Central Bedfordshire report (6.4 above) in not having routes of national importance close to turbines.
- d. We investigated the complicated planning history of the wind turbine on BOAT 1 and looked at Norfolk County Council's Rights of Way response to the Cross Bank Road turbine planning proposal. The response recommended that the minimum separation to the BOAT should be topple distance, but unfortunately this could not be implemented due to site constraints.
- e. The original planning application Access Statement said, *'There is no statutory separation between wind turbines and rights of way but advises that topple distance should be maintained, or as a minimum that turbine blades should not over sail public rights of way'*. A change to the turbine meant the blades did oversail the BOAT in contravention of a planning condition. The applicant appealed the decision not to remove the condition and the planning authority has referred to the situation saying *'The Inspector determined that the oversailing of the byway by the blades would be an overwhelming sight when crossing directly underneath and would diminish enjoyment of the route or cause anxiety, whether on foot, using a bicycle or in a vehicle in terms of the perception of risk.'* <https://democracy.west-norfolk.gov.uk/modgov/documents/s8439/16%2000531%20F%20-%20report.pdf>

Taking on board all these factors Natural England decided that whilst BOAT 1 offered a more direct and therefore convenient route, it was potentially unsafe, as recognised by government planning guidance and would not be a pleasant alignment option for walkers.

In preparing a response to this representation we found that The Ramblers also reference PPS 22 in their Walking Environment Officer Handbook (2011) in relation to their assessment of new turbine developments.

#### Path near BOAT 1

In their representation the Ramblers suggested a route option that is closer to the river than BOAT 1, so walkers are further away from the turbine on a new track that has been created. They do however observe that it would be subject to occasional high tides.

Section 4.4.2 of the Scheme guides us that people should normally expect to be able to continue along the trail at all states of the tide, and routes subject to tidal encroachment will therefore normally be avoided. Indeed the Ramblers themselves objected to a planning application for a route at a lower level in this location when it was proposed as an option to resolve the over-sailing issue because walkers would be *'waiting outside the town for a couple of hours until one of the higher tides goes down ..'* and yet they propose it for the ECP.

We therefore decided not to propose the coast path follow a route seaward of BOAT 1 as it would be inconvenient for walkers to wait out tides and other options were available to us which better fit the key principles of alignment set out in section 4 of the Scheme.

An optional alternative route could have been proposed but it would have meant walkers getting to the tidal section and then 'back-tracking' by up to 2.3km (to use the inland PRoW). Using the route would also not address other issues discussed below.

### Route of the ECP nearer to King's Lynn

In considering whether to propose using the BOAT we also had to consider the location for the next section of the ECP, how they would link and how the ECP would then enter King's Lynn. One option would be around the northern side of an adjacent industrial site but decided against it as it has another turbine.

Instead we considered the route along Cross Bank Road and would have liked to propose it due to the interest of walking through the Port however we concluded, because of the reasons below it was an unsuitable route for the Coast Path.

### Cross Bank Road

We gave careful consideration to proposing a route along Cross Bank Road. The Road is the first access point to the river after leaving King's Lynn and gives a greater distance walking alongside the river. (The proposed route is alongside the river on the opposite bank, giving views across to King's Lynn). The Ramblers suggested using it as '*it offers views of interest because of the dock activity.*'

There are two parts to Cross Bank Road – one section is alongside the river with light industrial use and one goes inland towards Edward Benefer Way.

We considered that there were several negative aspects to the Ramblers Association suggestion;

- a. The 'inland' route section of Cross Bank Road is along a road owned by Associated British Ports. It is the main access road to the Port that handles around 400,000 tonnes of cargo per year. The Scheme says:

*8.25.9 The trail will usually avoid passing through ports and other industrial areas in active working use. It will do so even where there is an existing public right of way, unless it offers an appropriate route that addresses any concerns about security, safety and efficient operations.*

- b. The Ramblers mention that parts of the road have a pavement and they are right to correct us that there is a pavement for 130m (24%) of the length of Cross Bank Road. However, elsewhere pedestrians share the road with HGVs and other vehicles that is unsegregated except for 60m with yellow hatched road markings near to and on the swing road bridge. The Ramblers mention central road markings, and these are mainly in the section that also has the pavement. For another approx. 300m there is no pavement and walkers would be likely to be in the carriageway because of roadside parking.

Cross Bank Road was assessed by a Norfolk County Council Highways Engineer who said '*Cross Bank Rd as you know is private, and does not have any physical footway, so pedestrians would have to walk in a live carriageway. It is heavily used by HGV's accessing the various businesses, a section of it is a swing bridge between the two docks and therefore opens on a regular basis, and the road surface is in a poor state of*

*repair, therefore I would not recommend this as part of your route.* We therefore accepted this professional advice in considering the route of the ECP in this area.

Our conclusion is supported by the representation (below) received by [redacted] [representation no. MCA/HSB3/R/9/HSB0286], a local resident who lives on the section of Cross Bank Road alongside the river and he says *'This section along Crossbank Road formally having an overall weight limit of 7.5 ton, together with a speed limit of 20mph, is regularly disregarded and abused upon a daily basis with a mix of speeding motorists accessing all areas along this road / river walk.'* (Note: Natural England does not have a photo of the signage; Google Street View (April 2010) shows a 15mph speed limit sign).

For the reasons set out above relating to the turbine and the Port we decided the Ramblers proposed modifications were not the best option for the ECP and so we proposed the inland PRoW. A route along Cross Bank Road and the BOAT alongside the river will be in seaward spreading room and so continue to be available.

### **Relevant appended documents (see section 5):**

G Photographs from Ramblers Association representation

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#### **Representation number:**

MCA/HSB3/R/3/HSB0799

#### **Organisation/ person making representation:**

Local Access Forum – [redacted]/[redacted]

#### **Route section(s) specific to this representation:**

*Representation form says 'n/a'*

*Comments refer to a route that would replace sections HSB-3-S002 to HSB-3S020*

#### **Other reports within stretch to which this representation also relates:**

N/A

### **Representation in full**

The route proposed in the report runs well inland, failing to meet the criterion of being close to the sea. Although much of it is a pleasant enough field edge, (1) the countryside is unexceptional, (2) the final exit into the urban area is across a field which, when last walked, had not had the path made across its rough surface, and (3) exits onto an unappealing industrial estate road and then along the busy A1078, which has a very limited footway on the eastern side (there is more on the other side, but it then requires crossing the road and crossing back later).

We propose instead that the route should use the northern end of King's Lynn FP2 and then BOAT1, then Cross Bank Road to join John Kennedy Road. This route follows close to the river, and, as it approaches King's Lynn, offers a fine view of the town and riverside. It then runs through the dock area, and although this is clearly industrial in nature, it offers views of interest because of the dock activity.

The part of this route along BOAT1 has been rejected because of concerns raised by Norfolk



County Council relating to a wind turbine, specifically potential danger from unspecified 'general failures', and 'ice falling from the turbine blades in certain weather conditions'. Yet the route remains a public right of way, so clearly any anticipated danger is not thought serious enough to require action. For walkers coming from the north, this section provides a welcome return to visibility of the water, a sight denied them for the previous 5 miles. To follow the route proposed in the report means a further 3 miles before seeing the water. We note that along much of its length, including the part running past the turbine, there is a path running at lower level (and even closer to the river), at a safe distance from any 'general failure' of the turbine that might be anticipated, or of ice falling from it in those 'certain weather conditions'; we understand that this path may be flooded at times of exceptional high tide, but this is by its nature, very rare - one of our members reports having regularly used it without difficulty. At BOAT level, we note that there is a turning circle that enables nervous walkers to keep their distance from the turbine.

The section along Cross Bank Road is also rejected on the advice of Norfolk County Council, this time on the grounds that it is 'unsafe for walkers due to a narrow road without pavement and lorry movements ...'. We do not agree that the road is narrow; along some of its length it has white centre lines marking out traffic lanes for both directions. Neither is it entirely without pavement: there is a pavement along the section of the road nearest the town, and markings to reserve space for walkers across the bridge (together with warning signs about pedestrians which clearly indicate that they are expected in the area). There is no real pavement along the part of the road furthest from the town, but we expect this will carry the least traffic, as some will have turned off at earlier points.

The road is within the dock area, where traffic will be comparatively slow moving (there is a 20mph speed limit, minimising the threat it presents). We would also anticipate that the majority of the traffic will be from regular users, who can be (and already are) warned of the likelihood of meeting walkers, and so take appropriate care. This route would also offer the added interest of walkers being able to view the docks themselves, rather than being steered away from them.

In short, we believe that the risks related to the turbine are given grossly excessive weight, both in terms of the likelihood of a 'general failure' occurring just as walkers are passing close by the turbine, and of the frequency of occurrence of the 'certain weather conditions' to generate ice which falls from the blades, again, just as walkers are passing. Similarly, we consider the risks of using Cross Bank Road are also overstated, and the description of the road itself misleading. As a result, the proposal in this section fails to meet the basic criteria for route selection.

### **Natural England's comments**

Please refer to the response to the representation above from the Ramblers Association [representation no. MCA/HSB3/R/4/HSB0824]

### **Relevant appended documents (see section 5):**

H Photographs from Local Access Forum representation

### ***Other representations***

#### **Representation ID:**

MCA/HSB Stretch/R/1/HSB0834

**Organisation/ person making representation:**

British Horse Society

**Name of site:**

**Report map reference:**

HSB 3a to 3e

**Route sections on or adjacent to the land:**

No sections were listed. In its entirety Report 3 is HSB3-S001 to HSB-3-S051

**Other reports within stretch to which this representation also relates**

Reports HSB 1, HSB2 and HSB 4

**Summary of representation:**

See first occurrence of representation under Length Report HSB1.

**Natural England's comment:**

See comments at first occurrence of representation under Length Report HSB1.

**Relevant appended documents (see Section 5):**

C Documents detailing infrastructure specifications

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**Representation ID:**

MCA/HSB Stretch/R/2/HSB0822

**Organisation/ person making representation:**

Water Management Alliance (Internal Drainage Board) – [redacted]

**Name of site:**

**Report map reference:**

HSB 3a to HSB 3e

**Route sections on or adjacent to the land:**

No sections were listed. In its entirety Report 3 is HSB3-S001 to HSB-3-S051

**Other reports within stretch to which this representation also relates**

HSB 2 and HSB4

**Summary of representation:**

See first occurrence of representation under Length Report HSB1

**Natural England's comment:**

Natural England appreciates the IDBs engagement in the development of our proposals and will work closely with them on the implementation of the coast path. We also very much welcome their offer of continued involvement and advice.

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**Representation ID:**

MCA/HSB3/R/2/HSB0836

**Organisation/ person making representation:**

Cycling UK – [redacted] - *National Off-Road Advisor*

**Name of site:**

**Report map reference:**

HSB 3a to 3e

**Route sections on or adjacent to the land:**

No sections were listed. In its entirety Report 3 is HSB-3-S001 to HSB-3-S051

**Other reports within stretch to which this representation also relates**

Reports HSB 1 and HSB 2

**Summary of representation:**

See summary for representation no. MCA/HSB1/R/3/HSB0836 under Length Report HSB1.

**Natural England's comment:**

See comments for representation no. MCA/HSB1/R/3/HSB0836 under Length Report HSB1.

**Relevant appended documents (see Section 5):**

I Suggested route in Report 3

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**Representation ID:**

MCA/HSB3/R/8/HSB0008

**Organisation/ person making representation:**

Disabled Ramblers – [redacted]

**Name of site:**

**Report map reference:**

HSB 3a to HSB 3e

**Route sections on or adjacent to the land:**

1. Report HSB 3: Accessibility statement at 3.2.6 and all route sections generally.
2. Map HSB 3a; Route sections HSB-3-S001 and HSB-3-S002
3. Map HSB 3e Route sections HSB-3-S047 to HSB-3-S051

## **Other reports within stretch to which this representation also relates**

Reports HSB 2 and HSB 4

### **Summary of representation**

#### Comment 1

Report HSB 3: Accessibility statement at 3.2.6 and all route sections generally.

The Disabled Ramblers is concerned that Natural England has not recognised that there is a significant and steadily increasing number of people with reduced mobility who use all-terrain mobility scooters and other mobility vehicles to enjoy routes on rugged terrain in the countryside, including uneven grass, bare soil or rocky paths, foreshore areas and some sea banks and beaches. Slopes of 1:4, obstacles 6" high, water to a depth of 8" are all challenges that users of all-terrain mobility scooters are used to managing. Modern batteries are now available that allow a range of up to 60 miles on one charge.

Disabled Ramblers is concerned in particular that Natural England has not taken into consideration that this group of people may want to access sea banks where they are of sufficient width (mobility vehicles being up to 85cm wide and often 173cm in length), so to enable them to do this Disabled Ramblers requests that slopes/ramps are provided either instead of, or alongside, steps where the height of the sea bank is not prohibitive (in which case an alternative access point should be identified where possible to enable these users to progress along the route).

Modern mobility vehicles are large, and many man-made barriers that will allow access to a manual wheelchair are not large enough for all-terrain mobility vehicles or for some 'pavement' scooters, and prevent legitimate access even though users of mobility vehicles have the same rights of access that walkers do.

Wherever possible man-made infrastructure should be replaced or adapted to enable these users to have the same, legitimate, use and enjoyment of the main route of the England Coast Path that walkers have. Suitability of all structures should always be considered with the assumption that a person with reduced mobility will be going out without more-mobile helpers, so will need to operate the structure on their own, seated on their mobility vehicle. Man-made infrastructure should not be a barrier to access.

#### Disabled Ramblers requests

- that new structures to be installed should be suitable for those who use large mobility vehicles, and should comply with British Standard BS5709: 2018 Gaps Gates and Stiles.
- that where existing man-made structures are a barrier to those who use mobility vehicles, these should be reviewed, and where necessary removed and replaced with suitable structures to allow access to the England Coast Path.
- compliance with the Equality Act 2010 (and the Public Sector Equality Duty within this act)
- compliance with the Countryside Rights of Way Act 2000
- adherence to the advice from Disabled Ramblers in the attached document Man-made Barriers and Least Restrictive Access.

#### Comment 2

Map HSB 3a; Route sections HSB-3-S001 and HSB-3-S002 Paragraph 3.2.6 of the Report states:

To the north of King's Lynn the trail would follow uneven grass along a bank and field edge and soil on a cross-field path.

All terrain mobility vehicles are built to manage rough ground and uneven grass and soil. However, inappropriate infrastructure can be a barrier.

Disabled Ramblers requests that:

- A new, suitable, pedestrian gate is positioned beside the existing field gate at the beginning of section HSB-3-S001.
- The proposed kissing gate at section HSB-3-S002 is a large kissing gate, suitable for use by large mobility vehicles, otherwise a suitable pedestrian gate is proposed instead.

### Comment 3

HSB 3e Route Sections HSB-3-S047 to HSB-3-S051

Users of all-terrain mobility vehicles can access the sea bank at the beginning of section HSB-3-S043 and progress unimpeded until they have passed the sluice at section HSB-3S047. Here a raised, fenced, walkway begins (about section HSB-3-S047 ending at section HSB-3-S051), at the ferry pier, where the route then continues inland (shown on Report 4) through a chicane, down a built zig-zag path and through another chicane to reach Ferry Square. Large mobility vehicles are unable to get past the tight turnings of these structures, so cannot progress along the Coast Path beyond section HSB-3-S051. There is not sufficient space for them to turn around to return south-wards the way they came, leaving them in a dangerous situation. There are other chicanes along the length of the raised walkway, although it is unknown if these are suitably spaced to be passable, and again there is not room to turn around. None of these structures are mentioned on the Proposal maps.

Disabled Ramblers requests that Natural England make provision for users of all mobility vehicles along this part of the England Coast Path by;

- providing a clearly visible warning at the point of no return when travelling north towards West Lynn Ferry.
- creating a clearly signed alternative route. Disabled Ramblers suggests an alternative route which leaves the sea bank just south of the sluice (approximately section HSB-3-S046) going inland down the grass vehicular service route, arriving at St Peter's Road. Pedestrian gates fitted with RADAR padlocks could be used to restrict those who could use this route, if necessary. From here the alternative route would continue along St Peter's Road, then along Bank Side, finally rejoining the main route at Ferry Square (Section HSB-4-S002 on Report 4).

### **Natural England's comment:**

#### Response to Comment 1

Natural England acknowledges its duties under the Equality Act 2010 and the Countryside and Rights of Way Act 2000, and also the extra responsibilities conferred by the Public Sector Equality Duty, under the former. Section 4.3.8 of the Scheme outlines that we follow the principles set out in our publication "By All Reasonable Means" to make the trail as easy to use as we reasonably can for disabled people and others with reduced mobility, whilst accepting that such opportunities will often be constrained by practical limitations, such as the rugged nature of the terrain or the availability of visitor transport and facilities.

An important element of equality law is that the needs of those with constrained or restricted mobility are considered throughout the planning, design and implementation processes, and that they are not simply treated as an 'add on'. We have endeavoured to achieve this as we have developed our proposals for the Hunstanton to Sutton Bridge stretch, and, if our proposals

are approved, will continue to do so through the implementation phase, working alongside Norfolk and Lincolnshire County Councils, which share the same responsibilities and duties.

We also recognise the importance of satisfying the relevant British Standards, and the desirability of complying with the advice contained in the *Disabled Ramblers Notes on Infrastructure* and will also be focusing on these documents as we work with the access authorities.

We also note the Disabled Ramblers' pertinent advice regarding the larger/ all-terrain mobility vehicles and believe that many parts of the Hunstanton to Sutton Bridge Stretch, including the great majority of the alignment covered by Report HSB 3, lend themselves to use by such vehicles, being on surfaced pavements and walkways through the town. The banks south of King's Lynn are hard-surfaced on both sides of the river. North of the town the route follows a grass bank and public footpath along a field-edge and cross-field.

Norfolk County Council works with Active Trails [www.activetrails.co.uk](http://www.activetrails.co.uk) when looking at improvements or assessing a route and undertakes an Accessibility Audit. (*'Active Trails are a group of disabled people who, like many others, enjoy the countryside and all it has to offer. Our mission is to inspire other people affected by disability to access the countryside. Our aim is to include all disabled people of varying abilities, using all types of outdoor wheelchairs to enable access.'*).

#### Response to Comment 2

We accept the Disabled Ramblers' comment about replacing the gates at HSB3-S001 and S002 and we will discuss this point with Norfolk County Council in relation to their route Accessibility Audit.

#### Response to Comment 3

We accept the Disabled Ramblers' comment that the riverside route will cause problems for users of large all-terrain mobility vehicles. Our maps show the proposals rather than the route constraints, but we were not aware of possible issues with the existing infrastructure. We believe the chicane (which we suggest is used to prevent motorcycle use) and zig-zag are owned by King's Lynn and West Norfolk Council and we will ask Norfolk County Council to raise the issue with them, so they are aware of this response to our proposals. The Disabled Ramblers has suggested an alternative, signed route however while coastal access legislation enables us to propose 'official' alternative routes for certain purposes, we are unable to propose an alternative route solely for the use of those with reduced mobility.

We will though discuss the potential to sign a route using existing footways in Clenchwarton Road and St Peter's Road with Norfolk County Council in relation to their route assessment and implementation work.

#### **Relevant appended documents (see Section 5):**

J Man-made barriers and least restrictive options – Disabled Ramblers

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#### **Representation ID:**

MCA/HSB3/R/9/HSB0286

#### **Organisation/ person making representation:**

[Redacted]

**Name of site:**

Crossbank Road

**Report map reference:**

HSB 3a to HSB 3c

**Route sections on or adjacent to the land:**

HSB-3-S002 to HSB-3-S020

**Other reports within stretch to which this representation also relates**

N/A

**Summary of representation:**

[Redacted] notes that the route of the ECP is different to the route following the river in front of his property along Crossbank Road.

He has seen many walkers follow that route to see the fishing boats and the many birds along the river going to and from the nature reserves.

He says that road signs warning of pedestrians have been removed along the stretch of surfaced road that extends along the river frontage, which is a local amenity in its own right.

He says that, as he is a resident many people ask the whereabouts of the coastal river path. The area is now industrialised so that walkers must keep a keen eye out for motor vehicles in order to enjoy the river walk.

This section along Crossbank Road formally having an overall weight limit of 7.5 ton, together with a speed limit of 20mph, is regularly “disregarded and abused upon a daily basis with a mix of speeding motorists accessing all areas along this road / river walk”.

Many walkers use Crossbank Road, getting close to the docks, preferring it to the unattractive walk along Estuary Road with its constant flow of HGV's.

The current route to the river beyond Estuary Road has no directional signs with zero view of the river beyond the industrialised road. It is only when you arrive near the farm that many coastal path seekers realise that access may be gained across the land to the river.

Many walkers, however, get very confused and retrace their footsteps back into the town. Determined to access the coastal path, they turn down Crossbank Road that does have an open clear view beyond and, particularly when they can see ship movements, they think Crossbank Road is the right route.

**Natural England's comment:**

We gave careful consideration to aligning the England Coast Path along Crossbank Road, through the Port, and alongside the river, past the turbine. We did not however propose that route for the reasons outlined in our response to representation MCA/HSB3/R/4/HSB0824 from The Ramblers.

Part of the route (alongside the river), discussed in [redacted]'s representation is a BOAT [Byway Open to All Traffic] and so already has a right of access. This will not be affected by our proposals and people will be able to continue to use it.

[Redacted] states that he is regularly asked about the location of the 'coastal river path' and that walkers get confused and retrace their steps in to King's Lynn. We would like to reassure him that our proposals for the England Coast Path include clear signage which will provide certainty for walkers about the route they should follow.

[Redacted] reports that road signs warning of pedestrians have been removed and this is an issue for the Access Authority in relation to it being designated as a BOAT.

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**Representation ID:**

MCA/HSB3/R/1/HSB0369

**Organisation/ person making representation:**

[Redacted]

**Name of site:**

**Report map reference:**

HSB 3a to HSB 3e

**Route sections on or adjacent to the land:**

No sections were listed. In its entirety Report 3 is HSB3-S001 to HSB-3-S051

**Other reports within stretch to which this representation also relates**

Reports HSB 1 and HSB 2

**Summary of representation:**

Supports the proposals of creating a path between Hunstanton and King's Lynn, particularly where access does not currently exist. Benefits to the local economy with tourism and an amenity for residents to explore new areas.

**Natural England's comment:**

Natural England welcomes this support for our proposals.

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**Representation ID:**

MCA/HSB3/R/5/HSB0837

**Organisation/ person making representation:**

Wash Frontages Group (WFG)

**Name of site:**

**Report map reference:**



HSB 3a to 3e

**Route sections on or adjacent to the land:**

No sections were listed. In its entirety Report 3 is HSB3-S001 to HSB-3-S051

**Other reports within stretch to which this representation also relates**

Reports HSB 2 and HSB 4

**Summary of representation:**

In response to 4.2.18 - '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'.

In addition to 'roll-back' WFG would like to see flood defence improvements included. This it says will ensure that future flood defence improvements are not hindered by the trail.

As an example, during the Wrangle Bank improvement in 2018, the sea bank had to be heightened, widened and reprofiled to protect the land behind it. The sea bank at Wrangle was the site of a public footpath, and this had to be temporarily closed. Firstly, during the works period on the grounds of safety and secondly for 18 months following completion of the works to allow the essential grass seeding to take and to prevent erosion to the additional soil put on top of the bank which increased its height. If the public had been allowed access on to the bank without this delay, a lot of the works carried out could have been damaged or undone.

In the event of a temporary or permanent route re-alignment, there would need to be a full consultation with affected landowners/occupiers to agree the terms.

The arrangements for the creation of the Coastal Path must allow for its closure for periods of time required to facilitate works being carried out to the sea bank and flood defences.

All the sea banks around The Wash will need to undergo a similar process in the forthcoming years and the creation of the Coastal Path cannot be allowed to be an obstacle to these essential works.

**Natural England's comment:**

Please refer to the response to the first representation above, from the CLA [representation number MCA/HSB3/R/10/HSB0823]

## **Length Report HSB4**

***Full representations***

**Representation number:**

MCA/HSB4/R/7/HSB0823

**Organisation/ person making representation:**

Country Land and Business Association – [redacted] – *National Access Advisor*

**Route section(s) specific to this representation:**

Representation says 'The land from Wolferton Creek to Sutton Bridge' (which covers Reports 2, 3 and 4). (In its entirety Report 4 is HSB-4-S001 to HSB-4-S025)

**Other reports within stretch to which this representation also relates:**

Reports HSB 2 and HSB 3

**Representation in full**

See text at representation number MCA/HSB3/R/10/HSB0823 under Length Report HSB3.

**Natural England's comments**

See comments at representation number MCA/HSB3/R/10/HSB0823 under Length Report HSB3.

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**Representation number:**

MCA/HSB4/R/4/HSB0840

**Organisation/ person making representation:**

National Farmers Union – [redacted] - *NFU East Midlands*

**Route section(s) specific to this representation:**

Representation says 'The land from Wolferton Creek to Sutton Bridge' (which covers Reports 2, 3 and 4). (In its entirety Report 4 is HSB-4-S001 to HSB-4-S025)

**Other reports within stretch to which this representation also relates:**

Reports HSB 2 and HSB 3

**Representation in full**

See text at representation number MCA/HSB3/R/6/HSB0840 under Length Report HSB3.

**Natural England's comments**

Please refer to the response above for the CLA representation [representation number MCA/HSB3/R/10/HSB0823 under Length Report HSB3].

**Relevant appended documents (see section 5):**

F Water Resources East - Initial Water Resources Position Statement

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**Representation number:**

MCA/HSB4/R/5/HSB0839

**Organisation/ person making representation:**

National Farmers Union – [redacted] - *Flood Management & Access Policy Adviser*

**Route section(s) specific to this representation:**

Representation says 'The land from Wolferton Creek to Sutton Bridge' (which covers Reports 2, 3 and 4). (In its entirety Report 4 is HSB-4-S001 to HSB-4-S025)

**Other reports within stretch to which this representation also relates:**

Reports HSB 2 and HSB 3

**Representation in full**

See text at representation number MCA/HSB3/R/7/HSB0839 under Length Report HSB3.

**Natural England's comments**

Please refer to the response above for the CLA representation [representation number MCA/HSB3/R/10/HSB0823 under length Report HSB3].

**Relevant appended documents (see section 5):**

F Water Resources East - Initial Water Resources Position Statement

***Other representations***

**Representation ID:**

MCA/HSB Stretch/R/1/HSB0834

**Organisation/ person making representation:**

British Horse Society

**Name of site:**

All of Report 4

**Report map reference:**

HSB 4a to 4l

**Route sections on or adjacent to the land:**

HSB-4-S001 to HSB-4-S025

**Other reports within stretch to which this representation also relates**

HSB 1, HSB 2 and HSB 3

**Summary of representation:**

See first occurrence of representation under Length Report HSB1.

**Natural England's comment:**

See comments at first occurrence of representation under Length Report HSB1.

**Relevant appended documents (see Section 5):**

C Documents detailing infrastructure specifications

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**Representation ID:**

MCA/HSB Stretch/R/2/HSB0822

**Organisation/ person making representation:**

Water Management Alliance (Internal Drainage Board) – [redacted]

**Name of site:**

All of Report 4

**Report map reference:**

HSB 4a to 4l

**Route sections on or adjacent to the land:**

HSB-4-S001 to HSB-4-S025

**Other reports within stretch to which this representation also relates**

Reports HSB 1, HSB 2 and HSB 3

**Summary of representation:**

See first occurrence of representation under Length Report HSB1.

**Natural England's comment:**

Natural England appreciates the IDBs engagement in the development of our proposals and will work closely with them on the implementation of the coast path. We also very much welcome their offer of continued involvement and advice.

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**Representation ID:**

MCA/HSB4/R/6/HSB0008

**Organisation/ person making representation:**

Disabled Ramblers – [redacted]

**Name of site:**

All of Report 4

**Report map reference:**

HSB 4a to 4l

**Route sections on or adjacent to the land:**

1. Report HSB 4: All route sections generally
2. Map HSB 4a Route section HSB-4-S001

3. Map HSB 4a Route section HSB-4-S004 and Map 4j
4. Route section HSB-4-S015: Access to sea banks
5. Map HSB 4a, Route section HSB-4-S006; Map 4b, Route section HSB-4-S007; Maps 4d and 4f, route section HSB-4-S009: Infrastructure

### **Other reports within stretch to which this representation also relates**

Reports HSB 2 and HSB 3

### **Summary of representation:**

#### Comment 1

Report HSB 4: All route sections generally

The Disabled Ramblers is concerned that Natural England has not recognised that there is a significant and steadily increasing number of people with reduced mobility who use all-terrain mobility scooters and other mobility vehicles to enjoy routes on rugged terrain in the countryside, including uneven grass, bare soil or rocky paths, foreshore areas and some sea banks and beaches. Slopes of 1:4, obstacles 6" high, water to a depth of 8" are all challenges that users of all-terrain mobility scooters are used to managing. Modern batteries are now available that allow a range of up to 60 miles on one charge.

Disabled Ramblers is concerned in particular that Natural England has not taken into consideration that this group of people may want to access sea banks where they are of sufficient width (mobility vehicles being up to 85cm wide and often 173cm in length), so to enable them to do this Disabled Ramblers requests that slopes/ramps are provided either instead of, or alongside, steps where the height of the sea bank is not prohibitive (in which case an alternative access point should be identified where possible to enable these users to progress along the route).

Modern mobility vehicles are large, and many man-made barriers that will allow access to a manual wheelchair are not large enough for some mobility vehicles, and prevent legitimate access even though users of mobility vehicles have the same rights of access that walkers do.

Wherever possible man-made infrastructure should be replaced or adapted. Suitability of all structures should always be considered with the assumption that a person with reduced mobility will be going out without more-mobile helpers, so will need to operate the structure on their own, seated on their mobility vehicle.

Disabled Ramblers requests that new structures to be installed should be suitable for

- those who use large mobility vehicles and should comply with British Standard BS5709: 2018 Gaps Gates and Stiles.
- that where existing man-made structures are a barrier to those who use mobility vehicles,
- these should be reviewed, and where necessary removed and replaced.
- compliance with the Equality Act 2010 (and the Public Sector Equality Duty within this act)
- compliance with the Countryside Rights of Way Act 2000
- adherence to the advice from Disabled Ramblers in the attached document Man-made Barriers and Least Restrictive Access.

#### Comment 2

Map HSB 4a Route section HSB-4-S001

Chicanes and tight turnings along section HSB-4-S001 between the West Lynn Ferry and Ferry Square make this section impassable to users of large mobility vehicles.

Disabled Ramblers requests that signage is clearly positioned showing an alternative route for users of large mobility vehicles who wish to progress along the England Coast Path in a southerly direction, regaining the route at a later point. (Disabled Ramblers has suggested an alternative route in their representation for HSB Report 3 at Comment 3).

### Comment 3

Map HSB 4a Route section HSB-4-S004 and Map 4j Route section HSB-4-S015: Access to sea banks

Paragraph 4.2.7 of the Report states:

*There are few artificial barriers to accessibility on the proposed route. However, the natural coastal terrain is often challenging for people with reduced mobility and this is the case on our proposed route because:*

- *The trail would use the slope of the seabank at West Lynn to access the bank top which is an uneven grass path.*
- *There are shallow steps near the Peter Scott lighthouse on the bank.*

At HSB-4-S004 on Map HSB 4a the trail uses the slope of the sea bank at West Lynn to access the bank top. Disabled Ramblers requests that the path along the slope here is improved to enable all-terrain mobility vehicles to more easily access the bank top.

At HSB-4-S015 on Map 4j, at Peter Scott lighthouse, Disabled Ramblers requests that a sloping path is provided near the existing steps for users of all-terrain mobility vehicles.

Sea banks of sufficient width can be suitable terrain for all-terrain mobility vehicles. Whilst walkers are provided access by means of steps or sloping paths, access for those with limited mobility is not often considered or provided. Sometimes the height of the sea bank is too high for access to be viable, but often a solution can be provided by building a wider path, suitably surfaced to aid grip, gently sloping up the bank. This can be near to, or instead of, the existing route. This solution also benefits many users of the trail, including those with all-terrain pushchairs and those with limited mobility who are not users of mobility vehicles.

Disabled Ramblers requests that wherever the route gains or leaves the sea bank, making provision for those with limited mobility including those on all-terrain mobility vehicles should be taken into consideration.

### Comment 4

Map HSB 4a, Route section HSB-4-S006; Map 4b, Route section HSB-4-S007; Maps 4d and 4f, route section HSB-4-S009: Infrastructure Paragraph 4.2.8 of the Report states:

*Along the route the existing gates will be replaced, so as to make them easier to use. We envisage this happening before the new access rights come into force, as part of the physical establishment work described below.*

Disabled Ramblers welcomes this intention, and trusts that the advice in the document *Manmade Barriers and Least Restrictive Access*, attached to this representation, will be helpful in selecting the most appropriate choice of new gates.

In particular we would advise:

Map HSB 4a: The proposed kissing gate at the beginning of section HSB-4-S006 should be a large kissing gate to accommodate users of large mobility vehicles.

Map 4b: The existing kissing gate at the end of section HSB-4-S007 should be changed to a pedestrian gate, or a large kissing gate suitable for users of large off-road mobility vehicles.

Maps 4d and 4f, route section HSB-4-S009 a pedestrian gate should be placed beside the existing field gates if there is sufficient width, or the existing field gates could be changed to York gates to allow users of all-terrain mobility vehicles to continue along the route at these points.

### **Natural England's comment:**

#### Response to Comment 1

Natural England acknowledges its duties under the Equality Act 2010 and the Countryside and Rights of Way Act 2000, and also the extra responsibilities conferred by the Public Sector Equality Duty, under the former. Section 4.3.8 of the Scheme outlines that we follow the principles set out in our publication "By All Reasonable Means" to make the trail as easy to use as we reasonably can for disabled people and others with reduced mobility, whilst accepting that such opportunities will often be constrained by practical limitations, such as the rugged nature of the terrain or the availability of visitor transport and facilities.

An important element of equality law is that the needs of those with constrained or restricted mobility are taken into account throughout the planning, design and implementation processes, and that they are not simply treated as an 'add on'. We have endeavoured to achieve this as we have developed our proposals for the Hunstanton to Sutton Bridge stretch, and, if our proposals are approved, will continue to do so through the implementation phase, working alongside Norfolk and Lincolnshire County Councils, which share the same responsibilities and duties.

We also recognise the importance of satisfying the relevant British Standards, and the desirability of complying with the advice contained in the *Disabled Ramblers Notes on Infrastructure* and will also be focusing on these documents as we work with the access authorities.

We also note the Disabled Ramblers' pertinent advice regarding the larger/ all-terrain mobility vehicles and believe that many parts of the Hunstanton to Sutton Bridge Stretch, on the banks covered by Report HSB 4, lend themselves to use by such vehicles. We will work with Norfolk County Council to address the issues raised about accessing the banks (see Comment 3 below).

Norfolk County Council works with Active Trails [www.activetrails.co.uk](http://www.activetrails.co.uk) when looking at improvements or assessing a route and undertakes an Accessibility Audit. (*'Active Trails are a group of disabled people who, like many others, enjoy the countryside and all it has to offer. Our mission is to inspire other people affected by disability to access the countryside. Our aim is to include all disabled people of varying abilities, using all types of outdoor wheelchairs to enable access.'*).

#### Response to Comment 2

We accept the Disabled Ramblers' comment about the provision of alternative, signed routes however while coastal access legislation enables us to propose 'official' alternative routes for certain purposes, it doesn't enable us to provide a separate formal alternative route solely for the use of those with reduced mobility. The alternative route identified is not a current public route and so in this instance, we do not have the power to create an alternative route on private land. We will though discuss the potential to sign a route using existing footways in

Clenchwarton Road and St Peter's Road with Norfolk County Council in relation to their route assessment and implementation work. We believe the chicane and zig-zag are owned by King's Lynn and West Norfolk Council and we will ask Norfolk County Council to raise the issue with them, so they are aware of this response to our proposals. The chicane, which we suggest is to prevent motorcycle use, can be avoided when the adjacent car park gates are open. (The ferry operates Monday to Saturday from 7:00am until 6:00pm.)

We will though discuss the potential to sign a route, to avoid the zig-zag slope and chicane using existing footways in Clenchwarton Road and St Peter's Road with Norfolk County Council in relation to their route assessment and implementation work.

### Response to Comment 3

We will discuss this point with Norfolk County Council, in relation to their Accessibility Audit how to accommodate access on to the bank at HSB-4-S004, or other ways of allowing onward movement, possibly using the Environment Agency gate at the bottom of the bank at HSB-4-S005. We may need to consider constraints about infrastructure close to the bank so the strength of the bank in its flood defence function is not compromised.

The Disabled Ramblers ask that the steps at HSB-4-S015, near the lighthouse are supplemented by a slope suitable for mobility vehicles. The nearby proposed route at HSB-4-S013 is up the seaward side of a grass sea bank and we will consider whether the slope can be made accessible as this will be key, along with considering the steps in endeavouring to adopt the principle of ensuring the least restrictive access and for structures to be compliant with BS5709.

### Response to Comment 4

We will discuss with Norfolk County Council, in relation to their Accessibility Audit how to accommodate access at HSB-4-S006, S007 and S009 to the gates standards given in BS5709.

### **Relevant appended documents (see Section 5):**

J Disabled Ramblers - Notes on Infrastructure

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### **Representation ID:**

MCA/HSB4/R/2/HSB0835

### **Organisation/ person making representation:**

[Redacted]

### **Name of site:**

Form says 'Peter Scott Walk'

### **Report map reference:**

Map HSB 4a to HSB 4j

### **Route sections on or adjacent to the land:**

HSB-4-S002 to HSB-4-S015

### **Other reports within stretch to which this representation also relates**

None



**Summary of representation:**

[Redacted] lives adjacent to one of the private gated roads to the marsh. He is frequently bothered by people who have ignored all signage and become locked in the marsh so he is concerned that this will become more of a problem and want to be assured that the access points at Ongar Hill and Sutton Bridge are specified as the only access. Walkers must be aware of the dangers if they leave the path and it must be clear that all land on the landward side of the path is private.

*Natural England was uncertain whether [reacted] was referring to seaward saltmarsh or landward arable land (several areas are still called Marsh on OS maps e.g. Terrington Marsh).*

[Redacted] provided more information saying;

‘The locked gates and private roads enter private farmland but these also lead out to the final sea bank which has the Peter Scott walk on it and the saltmarshes on the other side of it. Most people follow their satnavs and ignore anything else, some even want to know where the visitor amenities are and some are quite rude when we tell them that we will not let them in when the gates are locked, and others are tearfully grateful when we have let them out late at night! Once we even towed a chap and his family out when he had slipped off the road, his only alternative was to ring the emergency services, we did not want to waste their time. We have nothing against people walking the path but they must use the access points at either end and not gain access to it via private roadways and farmland.’

**Natural England’s comment:**

[Redacted] has farmland to the landward side of the trail, which we have proposed to be aligned on top of the sea bank. We have not proposed any landward coastal margin over the farmland, nor have we suggested or supported the creation of new access points to the ECP through it. Should our proposals be approved, the trail will be clearly waymarked, so the route is easy to follow on the ground.

[Redacted] is under no obligation to allow access through his land for people wishing to access the ECP, and he retains the right to lock gates and to erect signs clarifying the extent of public access over his land, so long as they are not misleading.

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**Representation ID:**

MCA/HSB4/R/1/HSB0831

**Organisation/ person making representation:**

Swavesey Bridleways Group

**Name of site:**

Public Footpath within Norfolk County Council on sea bank which forms part of this route

**Report map reference:**

HSB 4a to 4g

**Route sections on or adjacent to the land:**

HSB-4-S005 to HSB-4-S009

**Other reports within stretch to which this representation also relates**

None

**Summary of representation:**

The sea bank route from Sutton Bank to Kings Lynn is the same width, surface, and outlook for its entirety, but is split across two counties. The Lincolnshire (Sutton Bridge) part of the route is Public Bridleway and is enjoyed by walkers and horse riders plus some leisure cyclists. It is well-used and popular and a wonderful amenity for all three groups. The Norfolk (Kings Lynn) part of the route is Public Footpath and only open to walkers.

This anomaly needs to be corrected. There is no good reason why the entire Wash sea bank route should not be Public Bridleway.

Public money should be spent inclusively and creating a new public route which is only for walkers is not sensible expenditure of money. Half this route already is Public Bridleway so please make the remaining half Public Bridleway too.

The tourism industry is very important to Norfolk and to coastal Lincolnshire as an economic activity. Horse riding holidays are very popular activities which bring a good source of income to the local area; ditto with leisure cycling.

**Natural England's comment:**

Please refer to the response given above to the BHS representation

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**Representation ID:**

MCA/HSB4/R/3/HSB0837

**Organisation/ person making representation:**

Wash Frontages Group

**Name of site:**

All of Report 4

**Report map reference:**

HSB 4a to 4l

**Route sections on or adjacent to the land:**

HSB-4-S001 to HSB-4-S025

**Other reports within stretch to which this representation also relates**

Reports HSB 2 and HSB 3

**Summary of representation:**

See text at representation number MCA/HSB3/R/5/HSB0837 under Length Report HSB3.

**Natural England's comment:**

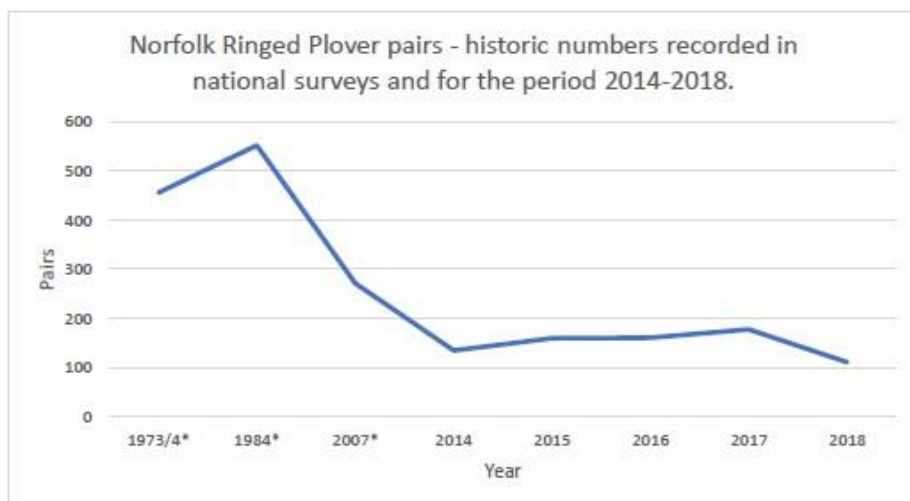
The CLA and NFU representations are based on this representation and so please refer to the response given to CLA above [representation number MCA/HSB3/R/10/HSB0823 under length Report HSB3].

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## 5. Supporting documents

### A. RSPB MCA/HSB1/R/5/HSB0673 - Number of pairs of ringed plover breeding at Snettisham between 2008 and 2020.

Site	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Snettisham	17	15	12	16	15	11	16	14	11	13	12	17	18
Heacham									8	13	9		



**B. RSPB MCA/HSB1/R/5/HSB0673 - Map of plover habitat and distribution from discussion between Natural England's Responsible Officer and RSPB's Sites Manager North West Norfolk reserves**



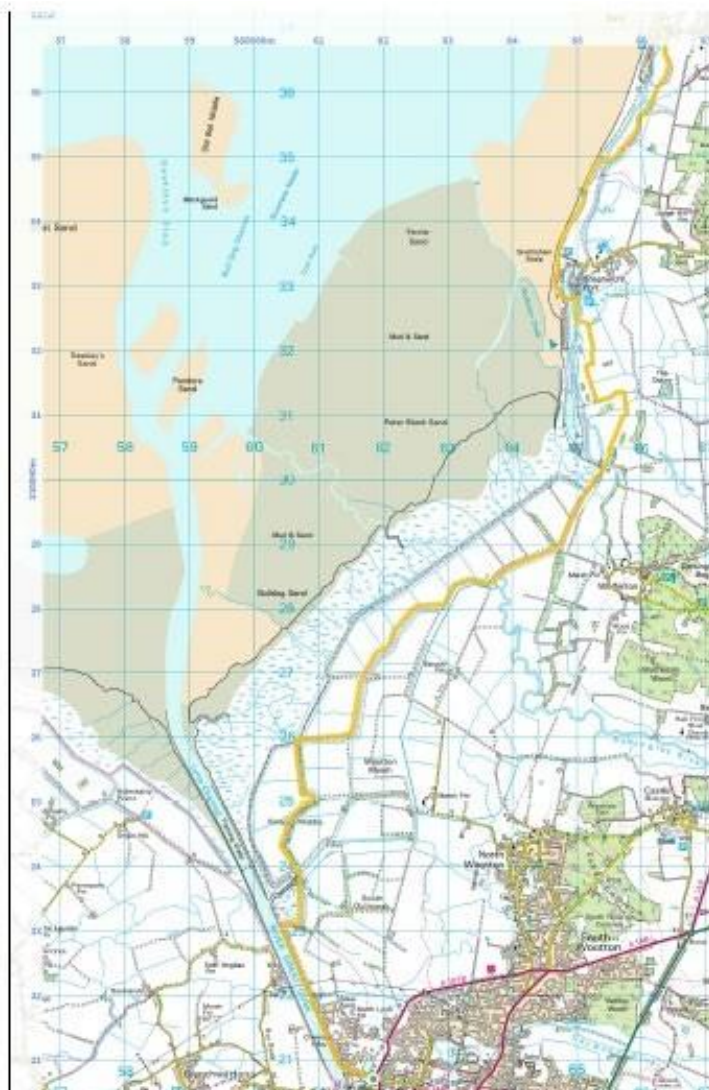
Yellow line – apparent good quality ringed plover habitat  
Orange line – location of ringed plover breeding territories in 2016 (7 territories). Red line – route of proposed ECP

### C. British Horse Society MCA/HSB Stretch/R/1/HSB0834 - infrastructure specifications

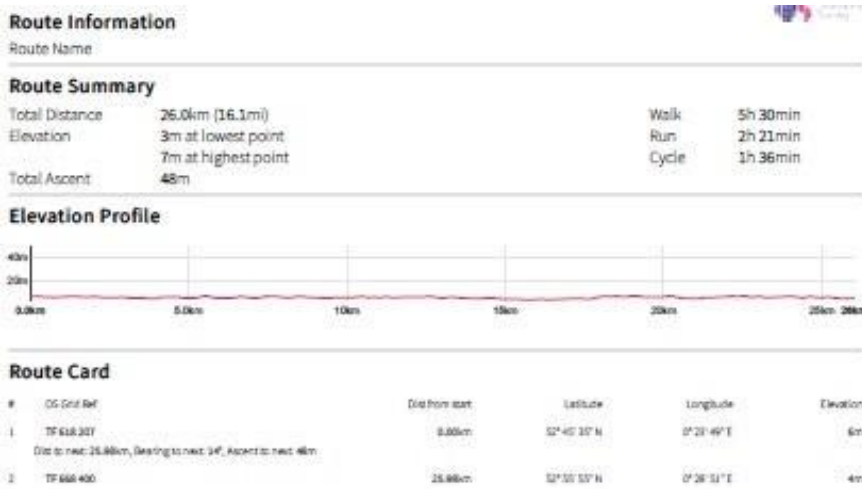
[To accompany their representation, the British Horse Society submitted nine PDF documents with information on suitable infrastructure standards for horses and shared user trails. The scope of the England Coast Path legislation extends to granting pedestrian access rights only, and no new rights for riders on horseback will be granted within HSB1, HSB3 and HSB4. Therefore, because they are not directly relevant to proposals and to save space here, this material has not been included. A list of the documents submitted is set out below].

- Bridges
- Developers planners 2019
- Dimensions
- Gate installation new 0419
- Gates
- Multi user 1219
- Road crossings 1219
- Rubber crumb
- Surfaces

### D. Cycling UK MCA/HSB1/R/3/HSB0836 - Map of suggested route



## E. Cycling UK MCA/HSB1/R/3/HSB0836 - Description of suggested route



## F. National Farmers Union MCA/HSB3/R/7/HSB0839 – Water Resources East - Initial Water Resources Position Statement

<https://wre.org.uk/wp-content/uploads/2020/04/WRE-Initial-statement-of-resource-needFINAL.pdf>

## G. Ramblers Association MCA/HSB3/R/4/HSB0824 – Photographs from representation



BOAT running alongside the river. Also shows a loop (grey surface with piling) that has been put in so the turbine blades do not oversail the BOAT.



BOAT and base of turbine alongside the river



View of part of the port from Cross Bank Road

H Local Access Forum [MCA/HSB3/R/3/HSB0799](#) – Photographs from representation



Top: BOAT running alongside the river. Also shows a loop (grey surface) that has been put in so the turbine blades do not oversail the BOAT.

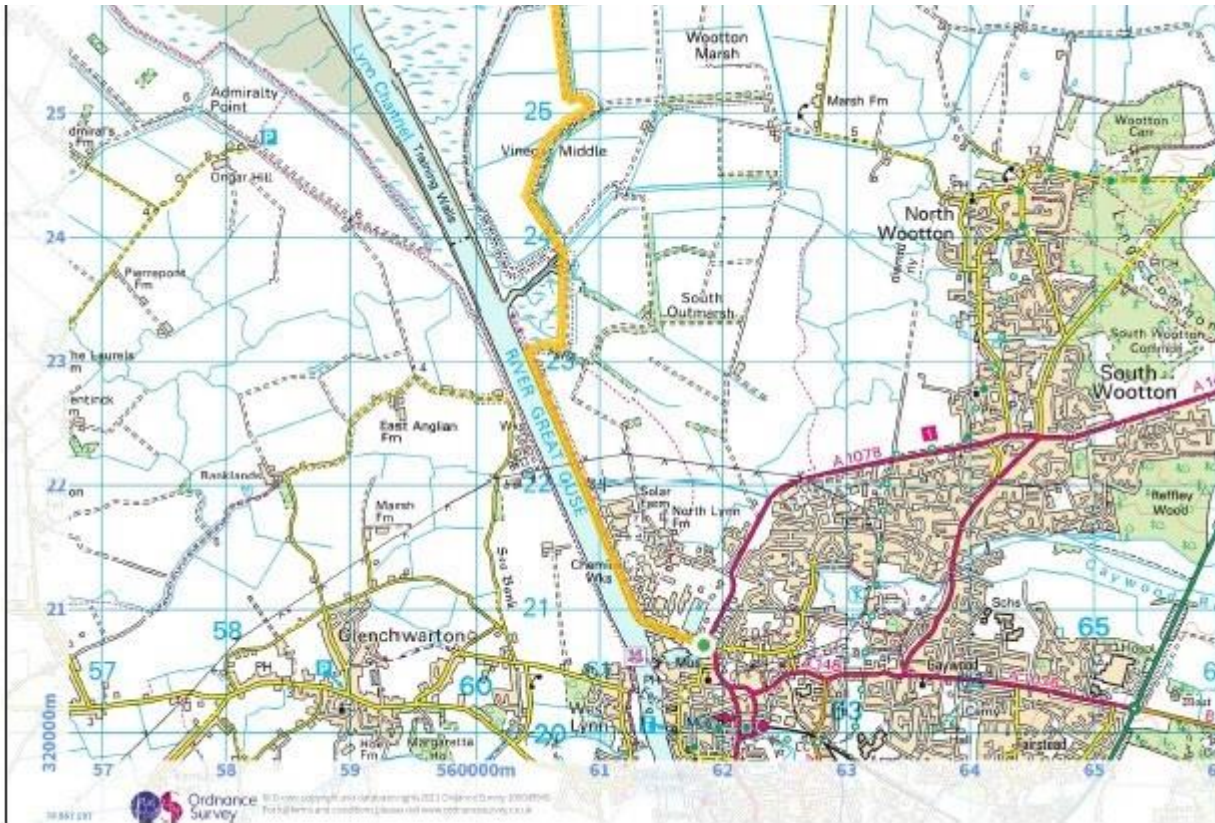
Bottom: BOAT and base of turbine alongside the river



View of part of the port from Cross Bank Road



## I Cycling UK MCA/HSB3/R/2/HSB0836 – suggested route within Report 3



## J Disabled Ramblers MCA/HSB3/R/8/HSB0008 and MCA/HSB4/R/8/HSB0008 – Man-made barriers and least restrictive options



Disabled Ramblers Ltd  
Company registered in England Number 05030316  
Registered Office: 7 Drury Lane, Hunsdon, Ware, Herts SG12 8NU  
<https://disabledramblers.co.uk>

Registered Charity Number 1103508

### **Man-made Barriers & Least Restrictive Access**

There are a significant and steadily increasing number of people with reduced mobility who like to get off tarmac onto natural surfaces and out to wilder areas to enjoy great views and get in touch with nature whenever they are able to. There are many ways they achieve this, depending on how rough and steep the terrain is. A determined pusher of a manual wheelchair can enable access to a disabled person across grass and up steep hills. An off-road mobility scooter rider can manage rough terrain, significant slopes, cross water up to 8" deep, and depending on their battery type and the terrain they are on, they can easily run 8 miles or more on one charge. Modern batteries are now available that allow a range of up to 60 miles on one charge!

Many more people too are now using mobility vehicles in urban areas, both manual and electric. 'Pavement' scooters and powerchairs often have very low ground clearance, and some disabilities mean that users are unable to withstand jolts, so well placed dropped kerbs and safe places to cross roads are needed.

Modern mobility vehicles can be very large, and many man-made barriers that will allow a manual wheelchair through are not large enough for all-terrain mobility vehicles, or for 'pavement' scooters and prevent legitimate access.

Users of mobility vehicles have the same rights of access that walkers do. Man-made structures along walking routes should not be a barrier to access for users of mobility vehicles. New structures should allow convenient access to mobility vehicle riders as standard, and should comply with British Standard BS5709: 2018 Gaps Gates and Stiles which places the emphasis on Least Restrictive Access. Suitability of structures should always be considered on the assumption that a person with reduced mobility will be going out without more-mobile helpers, so will need to operate the structure on their own, seated on their mobility vehicle.

When it is impossible to avoid man-made structures which are a barrier to mobility vehicles, wherever feasible a nearby alternative should be provided. For example, a slope adjacent to steps or a signed short diversion.

Whilst BS5709:2018 does not automatically apply retrospectively to most existing structures, Disabled Ramblers would like to see existing structures removed and replaced if they prevent access to users of mobility vehicles. Some structures can have a 'life' of 15 years – it would be a crying shame if those with limited mobility have to wait this long before they can be afforded the same access that walkers have to those areas where the terrain is suitable for mobility vehicles.

Disabled Ramblers campaign for:

- Installation of new structures that are suitable for those who use large mobility vehicles, and that comply with British Standard BS5709: 2018 Gaps Gates and Stiles.
- Review of existing man-made structures that are a barrier to those who use mobility vehicles, and where possible removal and replacement with suitable structures to allow access to these people
- compliance with the Equality Act 2010 (and the Public Sector Equality Duty within this act)
- compliance with the Countryside Rights of Way Act 2000
- adherence to the advice from Disabled Ramblers as set out below.

### Useful figures

- **Mobility Vehicles** ○ **Legal Maximum Width of Category 3 mobility vehicles: 85cm.** The same width is needed all the way up to pass through any kind of barrier to allow for handlebars, armrests and other bodywork.
  - **Length:** Mobility vehicles vary in length, but **173cm is a guide minimum length.**
- **Gaps** should be 1.1 minimum width on a footpath (BS5709:2018)
- **Pedestrian gates** The minimum clear width should be 1.1m (BS5709:2018)
- **Manoeuvring space** One-way opening gates need more manoeuvring space than two-way opening ones and some mobility vehicles may need a three metre diameter space
- **The ground** before, through and after any gap or barrier must be flat otherwise the resulting tilt effectively reduces the width

## Gaps

A Gap is always the preferred solution for access, and the least restrictive option (BS 5709:2018). The minimum clear width of gaps on footpaths should be 1.1metres (BS 5709:2018).

## Bollards

On a footpath, these should be placed to allow a minimum gap of 1.1metres through which large mobility vehicles can pass.

## Pedestrian gates

A two-way, self-closing gate closing gate with trombone handle and Centrewire EASY LATCH is the easiest to use – if well maintained, and if a simple gap is unacceptable. Yellow handles and EASY LATCH allow greater visibility and assist those with impaired sight too:

<https://centrewire.com/products/easy-latch-for2-way-gate/> One-way opening gates need more manoeuvring space than two-way and some mobility vehicles may need a three metre diameter space to manoeuvre around a one-way gate. The minimum clear width of pedestrian gates should be 1.1metres (BS 5709:2018).

## Field gates

Field gates (sometimes used across access roads) are too large and heavy for those with limited mobility to use, so should always be paired with an alternative such as a gap or pedestrian gate. However if this is not possible, a York 2 in 1 Gate:

<https://centrewire.com/products/york-2-in-1/> could be an alternative, with a self-closing, two-way opening, yellow handles and EASY LATCH.

## Bristol gates

(Step-over metal gate within a larger gate: <https://centrewire.com/?s=bristol>) These are a barrier to mobility vehicles as well as to pushchairs and so should be replaced with an appropriate structure. If space is limited, and a pedestrian gate not possible, a York 2 in 1 Gate: <https://centrewire.com/products/york-2in-1/> could be an alternative, with a self-closing, two-way opening, yellow handle and EASY LATCH for the public access part of the gate.

## Kissing gates

A two-way, self-closing gate is hugely preferable to a kissing gate, but in certain situations a kissing gate might be needed. Some kissing gates can be used by smaller pushchairs and small wheelchairs, but are impassable by mobility scooters and other mobility vehicles. Unless an existing kissing gate has been specifically designed for access by large mobility vehicles, it should be replaced, if possible with a suitable gate (see above). If a kissing gate really must be used, Disabled Ramblers only recommend the [Centrewire Woodstock Large Mobility](#) kissing gate. This is fitted with a RADAR lock which can be used by some users of mobility vehicles. NB this is the only type of kissing gate that is large enough to be used by all-terrain and large mobility vehicles.

### Note about RADAR locks on Kissing gates

Often mobility vehicle riders find RADAR locks difficult to use, so they should only be used if there is not a suitable alternative arrangement. Here are some of the reasons why:

- Rider cannot get off mobility vehicle to reach the lock
- Rider cannot reach lock from mobility vehicle (poor balance, lack of core strength etc.)
- Position of lock is in a corner so mobility vehicle cannot come alongside lock to reach it, even at an angle
- RADAR lock has not been well maintained and no longer works properly

- Not all disabled people realise that a RADAR key will open the lock, and don't know how these kissing gates work. There must be an appropriate, informative, label beside the lock.

### **Board walks, Footbridges, Quad bike bridges**

All of these structures should be designed to be appropriate for use by large mobility vehicles, be sufficiently wide and strong, and have toe-boards (a deck level edge rail) as edge protection. On longer board walks there may also be a need to provide periodic passing places.

### **Sleeper bridges**

Sleeper bridges are very often 3 sleepers wide, but they need to be at least 4 sleepers wide to allow for use by mobility vehicles.

### **Steps**

Whenever possible, step free routes should be available to users of mobility vehicles. Existing steps could be replaced, or supplemented at the side, by a slope or ramp. Where this is not possible, an alternative route should be provided. Sometimes this might necessitate a short diversion, regaining the main route a little further on, and this diversion should be signed.

### **Cycle chicanes and staggered barriers**

Cycle chicanes are, in most instances, impassable by mobility vehicles, in which case they should be replaced with an appropriate structure. Other forms of staggered barriers, such as those used to slow people down before a road, are very often equally impassable, especially for large mobility vehicles.

### **Undefined barriers, Motorcycle barriers, A frames, K barriers etc.**

Motorcycle barriers are to be avoided. Often they form an intimidating, narrow gap. Frequently put in place to restrict the illegal access of motorcycle users, they should only ever be used after very careful consideration of the measured extent of the motorcycle problem, and after all other solutions have been considered. In some areas existing motorcycle barriers are no longer necessary as there is no longer a motorcycle problem: in these cases the barriers should be removed.

If no alternative is possible, the gap in the barrier should be adjusted to allow riders of large mobility vehicles to pass through. Mobility vehicles can legally be up to 85 cm wide so the gap should be at least this; and the same width should be allowed all the way up from the ground to enable room for handle bars, arm rests and other bodywork. The ground beneath should be level otherwise a greater width is needed. K barriers are often less intimidating and allow for various options to be chosen, such as a shallow squeeze plate which is positioned higher off the ground: <http://www.kbarriers.co.uk/>

### **Stepping stones**

Stepping stones are a barrier to users of mobility vehicles, walkers who are less agile, and families with pushchairs. They should be replaced with a suitable alternative such as a footbridge (which, if not flush with the ground should have appropriate slopes at either end, not steps). If there are good reasons to retain the stepping stones, such as being listed by Historic England, a suitable alternative should be provided nearby, in addition to the stepping stones.

### **Stiles**

Stiles are a barrier to mobility vehicles, walkers who are less agile, and families with pushchairs. They should be replaced with a suitable alternative structure. If there are good reasons to retain the stile, such as it being listed by Historic England, then an alternative to the stile, such as a pedestrian gate, should be provided nearby in addition to the stile.

## **Urban areas and Kerbs**

In urban areas people with reduced mobility may well be using pavement scooters which have low ground clearance. Where the path follows a footway (e.g. pavement) it should be sufficiently wide for large mobility vehicles, and free of obstructions. The provision and correct positioning of dropped kerbs at suitable places along the footway is essential. Every time the path passes over a kerb, a dropped kerb should be provided.

Disabled Ramblers March 2020