

Coastal Access – Aldeburgh to Hopton-on-Sea lengths AHS1 to AHS3, AHS5 and AHS6



Representations with Natural England’s comments

June 2022

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1. Introduction

This document records the representations Natural England has received on the proposals in length reports AHS1 to AHS3, AHS5 and AHS6 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 Aldeburgh to Hopton-on-Sea they are included here in so far as they are relevant to lengths AHS1 to AHS3, AHS5 and AHS6 only.

2. Background

Natural England’s compendium of reports setting out its proposals for improved access to the coast from Aldeburgh to Hopton-on-Sea, comprising an overview and six separate length reports, was submitted to the Secretary of State on 29 January 2020. This began an eight-week period during which representations and objections about each constituent report could be made.

In total, Natural England received 33 representations pertaining to length reports AHS1 to AHS3, AHS5 and AHS6, of which 16 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 17 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 AHS1

Full representations

Representation number:

MCA/AHS Stretch/R/3/AHS0857

Organisation/ person making representation:

[Redacted] for Suffolk CC

Route section(s) specific to this representation:

All

Other reports within stretch to which this representation also relates:

N/A

Representation in full

If you require more space for your comments, please continue on a separate sheet.

Suffolk County Council welcome these proposals for the England Coast Path for Aldeburgh to Hopton. Although much of the southern part of the trail will use existing public rights of way, the sections north of Southwold in particular (Report AHS 4 and Report AHS 5) will create new

continuous access which will provide much needed access opportunities for local people and coastal businesses.

It will legitimise the longstanding informal access that has existed either following the erosion of the previous cliff top public rights of way (AHS Report 4 AHS -4-S062 to AHS -4-S075, Kessingland to Pakefield), or that exist only as well walked desire lines (AHS Report 4 AHS4-S023 to AHS-4-S026).

We welcome the use of roll back as this will enable the continued existence and use of the trail in conjunction with coastal processes, without reliance on public rights of way that have fixed positions.

Optional Alternative Routes (OAR)

We welcome the provision of alternative routes for when the main trail is unavailable as a result of tidal erosion and inundation. There are 3 optional alternative routes proposed:-

AHS 4i Easton Broad – using existing public highway and new access
AHS 4j Covehithe Broad- using existing public highway and new access AHS 4k
Benacre Broad -using existing public highway

We note that walkers will have to rely on information signs and their own assessment of the state of the beach and tide to choose whether to walk inland on the OAR or along the main trail.

The County Council are concerned that because the optional alternative routes are only legally available when the main trail isn't, this could create confusion for both walkers and land managers, resulting in possible conflict.

Maintenance of OARs

The County Council are concerned that the ongoing maintenance of works on an OAR is not included in the maintenance grant funding formula for National Trails and strongly requests that they should be.

For example, at AHS 4i Easton Broad OAR, signs, gates, hedge planting and surface cutting will all require ongoing maintenance, none of which is included in the maintenance grant formula.

Mitigation works

We welcome that some of the measures being proposed to protect the environment will be maintained by the reserve managers, currently Natural England; this includes fencing for protecting shore nesting birds, a stock proof fence to prevent disturbance to woodland birds and some signage.

The County Council seek assurance that if there is a change to the land management, that these measures will become the responsibility of the new land manager and/or revert to the landowner.

The County Council is concerned that other implementation works proposed as mitigation in order to fulfil the objectives of the Habitat Regulations, are not included in the maintenance grant funding formula for National Trails and believe that they should be.

. These include:-

- signs (AHS 4b AHS-4-S012)
- gates (AHS 4i AHS-4-OA003 and AHS-4-OA004)
- hedge planting on Easton OAR (AHS 4i AHS -4-S016)
- 20-30m rope fence on Dunwich beach in the coastal margin and not on the main trail (AHS-2e north of AHS-2-S54)

As a public body the County Council must have regard to the purpose of conserving biodiversity (NERC Act 2006), so this could result in disproportionate pressure on the use of the maintenance funding for this stretch.

Overall, the County Council believes that the proposals for improving coastal access on this stretch of the coast strikes the appropriate balance between public and private interests and recreational and environmental objectives as required by the approved coastal access scheme.

Natural England's comments

Natural England thanks Suffolk County Council for their broad support of our proposals between Aldeburgh and Hopton on Sea.

Optional Alternative Routes (OARs)

Three optional alternative routes (OAR) have been proposed in Coastal Access Report 4: Southwold to Pakefield, which the public can use to continue their onward journey around the coast when the proposed normal route seaward of Easton, Benacre and Covehithe Broads is unsuitable for use because of flooding and tidal action.

We do not believe there will be any confusion amongst walkers and land managers about when the vast majority of these routes are legally available to be used, because we have aligned them on public rights of way (PRoW) and highways which are legally available to the public at all times.

There are two small stretches of OAR where we were unable to do this. Proposed route sections AHS-4-OA001 to AHS-4-A003 (south of Easton Broad) and AHS-4-OA014 to AHS4A016 (south of Covehithe Broad). We have proposed a modification to the latter and this is covered in our comments on the objections and representations received to Coastal Access Report AHS 4: Southwold to Pakefield.

Signs will be installed at trail access points for all OARs explaining the legal circumstances under which they operate and the reasons for them. In addition, Natural England will ask the Ordnance Survey not to depict the OARs on their mapping systems, so that only those on the ground who may need them will be aware of their existence. We believe these measures will be sufficient to avoid confusion and conflict between walkers and land managers for the two small sections of OAR not aligned on PRoW or highways.

Maintenance of OARs

The vast majority of the proposed OARs are aligned on public rights of way (PRoW) and highways which the County Council are already legally required to maintain. They will not therefore impose a significant additional maintenance burden on them. There will however be some additional maintenance costs associated with these and with two small sections that aren't PRoW or highway.

Natural England funds all the costs associated with the establishment of the trail and the OARs as well as any associated mitigation works identified in both our Habitats Regulation Assessment and Nature Conservation Assessments. Thereafter we make a regular contribution to the ongoing management and maintenance of the trail and any infrastructure associated with it. This contribution is made in accordance with the national funding arrangements in place at the time. It is calculated using parameters associated only with the main route, and whilst we would expect the main route to be the focus of maintenance activity in order to meet the National Trail quality standards, there is no specific clause that prevents an Access Authority from using some of our grant to maintain the alternative route if they felt that was the priority in any specific year. In addition, in the early years we are not expecting newly installed infrastructure to need much maintenance. As the Access Authority, Suffolk County Council can therefore use their contributions in the early years to stockpile materials that could be used to replace structures associated with OARs further down the line.

Mitigation

Natural England acknowledges the significant mitigation measures proposed on this stretch of coast, some of which will be maintained by our own reserve managers. We do not anticipate any changes to this arrangement in the foreseeable future.

The current National Trails funding formula is due to be reviewed in the light of the experiences of developing the England Coast Path and given the need to maintain mitigation works associated with Habitat Regulation Assessments. Natural England expect this to happen next year which means it would coincide with the completion of England Coast Path establishment.

Relevant appended documents (see section 5): N/A

Representation number:

MCA/AHS Stretch/R/1/AHS0862

Organisation/ person making representation: [Redacted]
for Ramblers Association

Route section(s) specific to this representation:

All

Other reports within stretch to which this representation also relates:

Representation in full

Representation on AHS sections 1 to 6 of Aldeburgh to Hopton-on-Sea

This representation is made on behalf of Suffolk Area Ramblers, and are attached to the general representation form for the whole section, annotated number 1.

All of this section was surveyed by members of Suffolk Area Ramblers in the winter of 2017 - 2018, and meetings were held with the relevant Suffolk County Council Rights of Way Officers. Following further discussion with interested members of the Ramblers in the area, maps of the Ramblers suggested route, together with a detailed report of why we were recommending this route, and what works we considered to be necessary, were then submitted to Natural England in March 2018.

Subsequently I have been in regular contact with the Natural England representatives for this section, and have made some further visits to the proposed section of path as changes in the situation occur. Also, I have been appraised regularly of the differences between our initial suggestions and the Natural England preferred route, all of which changes have been explained and the reasons for alternative routes discussed.

Finally, the Report published on Wednesday 29th January 2020 has been made available to all interested parties in the Ramblers Alde Valley and Waveney area groups, and the maps of the Suffolk section were on display at the Suffolk Area Ramblers AGM on 1st February 2020. The responses from those consulted have been generally favourable, and any comments I have felt worthwhile in passing on to you for consideration, are on the representation forms annotated 2 and 3.

I would therefore, on behalf of Suffolk Area Ramblers, like to commend the proposed route for this section of the England Coast Path, and we look forward eagerly to the path being made available on the ground along the full length, and open to public use.

[Redacted]

[Redacted]

Suffolk Area Ramblers Coastal Access Officer 13th March
2020

Natural England's comments

Natural England welcomes the supportive comments of Suffolk Area Ramblers in relation to our proposals in Coastal Access Reports AHS 1 to 6.

Relevant appended documents (see section 5):N/A

Representation number:

MCA/AHS Stretch/R/2/AHS0891

Organisation/ person making representation:

[Redacted] for RSPB

Route section(s) specific to this representation:

All

Other reports within stretch to which this representation also relates:

N/A

Representation in full

We do not agree with the approach taken to in-combination assessment, where only those impacts not considered to result in adverse effects on integrity of sites alone are carried forward for in-combination assessment.

We consider that impacts which are significant alone may also have the potential to have additive or synergistic impacts when considered in-combination with impacts from other projects and that this approach risks the proposal of insufficient mitigation.

The in-combination assessment of the Coast Path and Sizewell C states that: We anticipate that the pending mitigation package will allow a conclusion of no adverse effect, both alone and in combination with other live plans or projects, from recreational impacts in relation to this project. We do not consider that sufficient evidence has been provided to support this conclusion as an application has not yet been submitted for these proposals.

Natural England's Comments

In relation to the "approach taken to in combination assessment," the Habitat Regulation Assessments Natural England undertakes are in line with the detailed independent guidance available in the externally-produced HRA Handbook independently published and maintained by DTA Publications Ltd. (The industry standard). This details at Section C8, DTA Publications | C.8 The 'in-combination' assessment, how in-combination impacts should be considered. Natural England have reviewed the published HRA and are confident that it has correctly followed the independent procedure. We have considered the direct effect of the project on the European sites and where we have determined that the impacts are not significant and have no residual effect the guidance at section C8.6 requires no further assessment. Where there has been a concern regarding a residual effect from our project when considered alone, we have gone on to assess the 'in-combination' effect.

The in-combination effect from other noted plans such as Sizewell C is a separate issue to the above. Habitat Regulation Assessments cast a broad net to determine the in combination impacts from other projects, in line with the HRA Handbook. Some of these other projects will still be in development and at draft stages. Any concluded HRA can only consider the project plans at whatever stage of drafting they are at for in-combination assessments. As the ECP proposals have concluded and published, it will be for other plans, such as Sizewell C to consider finalised plans that could act in-combination with their project.

Relevant appended documents (see section 5):N/A

Representation number:
MCA/AHS1/R/4/AHS0873

Organisation/ person making representation:
[Redacted] for Suffolk Local Access Forum

Route section(s) specific to this representation:
AHS-1-S001 FW to AHS-1-S042 FP

Other reports within stretch to which this representation also relates:
N/A

Representation in full

Thank you for consulting the Suffolk Local Access Forum on the three recently released reports on sections of the England Coast Path in Suffolk. A sub-group of SLAF have examined these reports and are generally pleased with the routes that have been put forward and would like to thank all those involved including Natural England staff, SCC rights of way officers and landowners who have been working together on this project.

We have examined the **Aldeburgh and Hopton-on-Sea report 1** and have set our comments below.

We support the stretch from Aldeburgh to Thorpeness using the promenade and the well walked section of path into the village as well as the proposed exit which will avoid unstable cliffs.

At Sizewell NE are obviously aware of possible issues during the construction of Sizewell C if it goes ahead. SLAF have already made comments to EDF on its concerns relating to access issues both during and after construction involving the possible closure of the coast path route whilst beach landings are in operation and the impact of the construction of new flood defences. We have suggested that these should be made wide enough so the coast path can be relocated on top of defences to future proof it against beach erosion.

SLAF are looking forward to receiving the reports on the final sections of the England Coast Path in Suffolk, the Deben Estuary from Felixstowe Ferry to Bawdsey, and from Bawdsey to Aldeburgh

Natural England's comments

Natural England welcomes the supportive comments of Suffolk Local Access Forum in relation to our report for AHS 1: Aldeburgh to Sizewell.

Section 1.2.18 of our Coastal Access Report identifies how the continuity of access along the England Coast Path can be maintained at Sizewell if the proposed developments there go ahead. This can be done through the provision of a temporary route for use when the main route is unavailable.

We note that the Access Forum have asked EDF to make the new flood defences wide enough to enable the coast path to be relocated on top of them to future proof it against beach erosion.

Relevant appended documents (see section 5): N/A

Representation number: MCA/AHS1/R/5/AHS0862

Organisation/ person making representation:

[Redacted] for Ramblers Association

Route section(s) specific to this representation:

AHS-1-S001 FW to AHS-1-S042 FP

Other reports within stretch to which this representation also relates:

AHS 1, AHS 2 and AHS3

Representation in full

Representation on AHS sections 1 to 3 of Aldeburgh to Hopton-on-Sea

This representation is made on behalf of Suffolk Area Ramblers, and is attached to the representation form for the sections AHS1 to AHS3, annotated number 2.

The Ramblers appreciate the efforts made by NE to keep the proposed coastal access path as close to the sea as possible, with such measures as the addition of a grid between AHS1 So07 and So08, to try and keep users on the proposed route of the path.

With continual erosion of cliff in the area north of Thorpeness, we welcome the creation of new steps at AHS1 So25 to make a clear and easy to use route down from the clifftop.

We also welcome the use of 'dogs on lead' sections in order to make the path available at all times of the year, without resorting to more inland routes.

With a number of alternatives along the Sizewell Cliff area, the majority are happy with the proposed 'mid-level' option adjacent to Forge Cottage, AHS1 So29 northwards.

Also, approval has been expressed for the use of the footpath along the top of the bank just south of Dunwich Heath AHS2 So28 area.

In general, we commend the use of fenced off breeding area restrictions between AHS2 So55 and AHS3 So24, thus allowing the beach-side route to be available all year.

The Ramblers especially appreciate the use of an off-road route through Dunwich Heath National Trust land, as proposed, although disappointment has been expressed that the route has to go around the accepted land from So28 to So47. This inland route was the Ramblers alternative proposal, and overall, we are happy with the planned route in this area.

We are very pleased to see the creation of an off-road section AHS2 So58 to So62, as this had been a concern of our using the narrow road section with poor visibility for pedestrians.

We are also pleased to have the inland route around the saltmarsh area confirmed, north of Dunwich, as this was the Ramblers preferred option, and note the improvement of creating a route along the existing track at AHS So03.

Overall, the Ramblers approve of the proposed coastal access route in this section AHS 1 to 3.

[Redacted]

Suffolk Area Ramblers Coastal Access Officer
13th March 2020

Natural England's comments

Natural England welcomes the supportive comments of Suffolk Area Ramblers in relation to our proposals in report AHS 1: Aldeburgh to Sizewell.

(Natural England's comments on the parts of the representation relating to Chapter Reports AHS 2 and AHS 3 are given separately under our comments for those Chapter reports).

Relevant appended documents (see section 6):N/A

Representation number: MCA/AHS1/R/6/AHS0891

Organisation/ person making representation: [Redacted]
for RSPB

Route section(s) specific to this representation:
AHS-1-S001 FW to AHS-1-S042 FP

Other reports within stretch to which this representation also relates:
N/A

Representation in full

We are content that the route choice and mitigation measures proposed reflect our previous discussions with Natural England and do not give rise to any concerns.

We agree that monitoring of the impacts of the path and the effectiveness of mitigation measures will be required and would welcome discussions with the RO to review the results of this. We wish to note, however, that while we carry out our own monitoring in line with our reserve management plans, we do not have sufficient resource to carry out the additional monitoring needed in relation to the new coast path.

We are also concerned about the effectiveness of mitigation measures, particularly in relation to areas of spreading room excluded under s26 of the Countryside and Rights of Way Act (2000) (nature conservation) and where signage is used to encourage walkers to avoid sensitive areas for wildlife. Whilst we understand that the increase in the numbers of walkers and changes to the patterns of access are likely to be small, we consider it is essential that excluded areas are clearly marked on the ground and that signage is carefully located. We recommend that monitoring of the effectiveness of these measures is carried out and consider that further mitigation may be needed if mapping and signage are not sufficient to enforce these restrictions.

Natural England's comments

We welcome the RSPB's confirmation that our route choice and mitigation measures reflect their discussions with us and raise no concerns for them.

Natural England's statutory purpose is to conserve, enhance and manage the natural environment for the benefit of present and future generations. In keeping with this we aim to strike the right balance in each circumstance between securing opportunities for the public to enjoy the natural environment, and ensuring appropriate protection of it when developing our proposals for the England Coast Path.

A full assessment of any potential impacts of our proposals on wildlife and habitats of local and national importance, and also on the sites and designated features of European importance, was undertaken as part of the preparation of our proposals. Our detailed findings in relation to

ASH1: Aldeburgh to Sizewell were published alongside our proposals in the following documents:

- Assessment of Coastal Access Proposals between Aldeburgh and Sizewell on sites and features of nature conservation concern 29th January 2020,
- Habitats Regulation Assessment of England Coast Path proposals for Aldeburgh to Hopton on Sea on sites of European importance for nature conservation 29th January 2020.

In respect of local and national sites and features of nature conservation concern, the assessment found that in developing the new access proposals the appropriate balance has been struck between Natural England's conservation and access objectives, duties and purposes. In respect of the conservation objectives of European sites, the assessment found that our proposals are fully compatible with the relevant European site conservation objectives and that taking into account any incorporated avoidance and mitigation measures, will not have an adverse effect on their integrity.

These assessments identify the need for clear, effective signage to demarcate preferred routes for walkers to take and interpretation of interest features and positive messaging to encourage behaviours which would protect them. The RSPB are however mistaken in their assertion that these assessments require special measures to be introduced to monitor the impacts of the path and effectiveness of mitigation measures.

Accordingly, our Coastal Access Report for AHS 1: Aldeburgh to Sizewell, proposes the following measures to protect the environment:

- *“A section of geo-cellular grid will be installed between sections AHS-1-S007 and AHS-1-S008 (Map AHS 1b) near Haven House to encourage walkers onto the path and discourage dispersed access onto the areas of vegetated shingle.*
- *Clear signposting of the route of the trail across The Haven between the tarmac surfaced path at section AHS-1-S006 and section AHS-1-S007 (Map AHS 1b) at Haven House will be achieved through the use of discreet, short wooden waymarkers.*
- *Establishment works between sections AHS-1-S026 and AHS-1-S029 (Maps AHS 1d and 1e) to create the England Coast Path will also include revetment work on the “mid-level route” section at the northern end of the SSSI. This will make the route more pleasant for walkers and encourage them to use the trail rather than the vegetated shingle.*
- *A new set of steps at section AHS-1-S025 (Map AHS 1d) linking this mid-level route to the cliff top near Thorpeness Common will also encourage people away from the sensitive areas on the beach. This will form part of the establishment works.”*

The RSPB are also mistaken in their assertion that we propose to exclude areas of spreading room under section 26 of the Countryside and Rights of Way Act 2000 in this Coastal Access Report. No such proposals have been made so there is nothing to monitor in respect of this.

The ongoing management and maintenance of the trail and any infrastructure associated with it, including these mitigation measures, will be undertaken by Suffolk County Council who are the local Access Authority. As a National Trail the England Coast Path will also receive a contribution towards this work from Natural England, in accordance with the national funding arrangements in place at the time.

Relevant appended documents (see section 5):N/A

Other representations

Representations containing similar or identical points

Representation ID

Organisation/ person making representation:

MCA/AHS1/R/1/AHS1469

[Redacted]

MCA/AHS1/R/2/AHS1480

[Redacted] for Friston Parish Council

MCA/AHS1/R/3/AHS1481

[Redacted]

MCA/AHS1/R/7/AHS1484

[Redacted], [Redacted] and [Redacted]

Name of site:

Aldeburgh to Sizewell

Report map reference:

AHS 1a to AHS 1e

Route sections on or adjacent to the land:

AHS-1-S001 FW to AHS-1-S042 FP

Other reports within stretch to which this representation also relates

Summary of point:

Support is expressed for the England Coast Path Project.

Natural England's comment:

Natural welcomes the support for the England Coast Path.

Relevant appended documents (see Section 5):

Representations containing similar or identical points

Representation ID

Organisation/ person making representation:

MCA/AHS1/R/1/AHS1469

[Redacted]

MCA/AHS1/R/2/AHS1480

[Redacted] for Friston Parish Council

MCA/AHS1/R/3/AHS1481

[Redacted]

MCA/AHS1/R/7/AHS1484

[Redacted], [Redacted] and [Redacted]

Name of site:

Aldeburgh to Sizewell

Report map reference:

AHS 1a to AHS 1e

Route sections on or adjacent to the land:

AHS-1-S001 FW to AHS-1-S042 FP

Other reports within stretch to which this representation also relates

Summary of point:

Concern is expressed about the impact of the proposed construction of Sizewell C which would block the path for a decade.

Natural England's comment:

Natural England acknowledges that if the proposed construction of Sizewell C is approved it could impact on the route of the England Coast Path for a number of years. However, there are powers under section 55I of the 1949 Act to provide temporary routes for the trail, at times when access to the ordinary route is unavailable. This is outlined in Figure 17 of The Coastal Access Approved Scheme.

Section 1.2.18 of our Coastal Access Report AHS 1: Aldeburgh to Sizewell identifies that this power can be used to provide a temporary route to ensure the continuity of access along the England Coast Path at Sizewell if the proposed developments there go ahead.

Relevant appended documents (see Section 5):

Representations containing similar or identical points

Representation ID

Organisation/ person making representation:

MCA/AHS1/R/1/AHS1469

[Redacted]

MCA/AHS1/R/2/AHS1480

[Redacted] for Friston Parish Council

MCA/AHS1/R/3/AHS1481

[Redacted]

MCA/AHS1/R/7/AHS1484

[Redacted], [Redacted] and [Redacted]

Name of site:

Aldeburgh to Sizewell

Report map reference:

AHS 1a to AHS 1e

Route sections on or adjacent to the land:

AHS-1-S001 FW to AHS-1-S042 FP

Other reports within stretch to which this representation also relates

Summary of point:

The report hasn't taken into account the detrimental effect of the further offshore wind projects, which will affect this stretch of the coast path.

Natural England's comment:

Our report to the Secretary of State aims to take full account of any change in the use of the land across which we propose to align the coast path which can reasonably be foreseen at the time that we prepare our initial proposals to the Secretary of State.

East Anglia One North and East Anglia Two offshore windfarms were at pre application stage when we were developing our proposals for this stretch of coast. Natural England considered the impact they could have on the England Coast Path and commented on this in the pre application advice we offered. We did not identify any impacts that required us to make any special provisions in our proposals. We apologise for not mentioning these developments in our Overview document.

It should be noted that there are powers in the legislation which enables the England Coast Path to cope with any developments that occur after the new coastal access rights have commenced such as:

- Powers to provide temporary routes for the trail, at times when access to the ordinary route is unavailable, such as when a development is taking place. These are outlined in Figure 17 of The Coastal Access Approved Scheme.
- Powers to amend the route after the report is confirmed, if this is necessary as a result of changes in the use of affected land which could not be foreseen at the time when we

made our initial proposals. We do this by submitting a variation report to the Secretary of State as outlined in section 5.5.4 of The Coastal Access Approved Scheme.

Relevant appended documents (see Section 5):

Representation ID:

MCA/AHS1/R/8/AHS0475

Organisation/ person making representation:

[Redacted] of Thorpeness Coastal Futures Group

Name of site:

Thorpeness Village

Report map reference:

AHS 1c

Route sections on or adjacent to the land:

AHS-1-S013 FP to AHS-1-S021

Other reports within stretch to which this representation also relates

Summary of representation:

Thorpeness Coastal Futures Group is promoting a Community Interest Company to protect and enhance the unique heritage and recreational value of Thorpeness as a seaside holiday Village. There is currently a coast path along the beach with good sea views which they would like to maintain. They do not support Natural England's proposals to realign it through the village.

They have engaged Hawkins Brown Architects to prepare alternative designs that would maintain the current coast route which are provided. They have liaised with Mott MacDonald engineers to establish that these proposals are practical and affordable. They have reviewed the coastal access routes being proposed for infrastructure development in the vicinity by Scottish Power, EDF and others, which can be repurposed as future pedestrian and cycle routes to connect with the Coastal Path.

They would like these proposals to form the Coastal Path at Thorpeness. This would retain the existing path position overlooking the beach and enhance step free access for locals and visitors alike.

Natural England's comment:

Where there is a choice of route, such as at Thorpeness, Natural England is required to propose the one that best balances the public and private interests described in sections 4 and 5 of the Coastal Access Approved Scheme, whilst also ensuring the protection of key sensitive features.

The vision put forward in the designs provided by Hawkins Brown Architects includes the creation of an integrated sea defence to protect the village and coastline on which a wide board walk would be created to enable access and provide space for the community to enjoy. Whilst

we agree that the route would be closer to the sea than the proposed route and would have excellent sea views, the provision of a sea defence structure appears to be integral to its design and this sits outside the scope of The England Coast Path programme. We cannot therefore consider it as a viable option for our purposes.

When aligning the trail we did however give careful consideration to aligning route sections AHS-1-S013 to AHS-1- S025 of the coast path along the beach. Our findings are given in Section 1.3.2 of our proposals for AHS 1. In particular we found it would involve a long, avoidable section of challenging walking on soft sand/shingle which would be inconvenient for walkers to use, particularly those with reduced mobility. We also found it would be less easy for walkers to access the onward cliff top sections. Section 4.3 of the Scheme – ‘Adjustments for disabled people and others with reduced mobility’ guides our approach to aligning the trail to ensure that it is as inclusive as possible. In line with this we only align the trail on a sandy beach where there are no other suitable route options.

The proposed route follows existing public rights of way or highway on the seaward side of the village so no beach walking is required and it also avoids fragile vegetated shingle on beach which is designated as part of Leiston – Aldeburgh SSSI. It was therefore determined that the proposed route struck the best balance between private and public interests and protected the vegetated shingle on the beach.

We would like to make it clear that we are not proposing to realign the existing coast path. Under our proposals, all existing walked routes along the beach in this location would remain available for people to use as part of the spreading room seaward of the proposed route, so walkers can continue to use these as they do now. In addition all existing public rights of way would remain in place and would be unaffected by our proposals.

Relevant appended documents (see Section 5):

Length Report AHS2

Full representations Representation

number:

MCA/AHS Stretch/R/3/AHS0857

Organisation/ person making representation:

[Redacted] for Suffolk CC

Route section(s) specific to this representation:

All

Other reports within stretch to which this representation also relates:

N/A

Representation in full

If you require more space for your comments, please continue on a separate sheet.

See first instance of representation under AHS1.

Natural England's comments

See first instance of representation under AHS1.

Relevant appended documents (see section 5): N/A

Representation number:

MCA/AHS Stretch/R/1/AHS0862

Organisation/ person making representation: [Redacted]
for Ramblers Association

Route section(s) specific to this representation:

All

Other reports within stretch to which this representation also relates:

Representation in full

Representation on AHS sections 1 to 6 of Aldeburgh to Hopton-on-Sea

See first instance of representation under AHS1.

Natural England's comments

Natural England welcomes the supportive comments of Suffolk Area Ramblers in relation to our proposals in Coastal Access Reports AHS 1to 6.

Relevant appended documents (see section 5):N/A

Representation number:

MCA/AHS Stretch/R/2/AHS0891

Organisation/ person making representation:

[Redacted] for RSPB

Route section(s) specific to this representation:

All

Other reports within stretch to which this representation also relates:

N/A

Representation in full

See first instance of representation under AHS1.

Natural England's Comments

See first instance of representation under AHS1.

Relevant appended documents (see section 5):N/A

Representation number: MCA/AHS2/R/3/AHS0873

Organisation/ person making representation:

[Redacted] for Suffolk Local Access Forum

Route section(s) specific to this representation: AHS-2-S001

FP to AHS-2-S064

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Thank you for consulting the Suffolk Local Access Forum on the three recently released reports on sections of the England Coast Path in Suffolk. A sub-group of SLAF have examined these reports and are generally pleased with the routes that have been put forward and would like to thank all those involved including Natural England staff, SCC rights of way officers and landowners who have been working together on this project.

We have examined the **Aldeburgh and Hopton-on-Sea report 2** and have set our comments below.

At Sizewell NE are obviously aware of possible issues during the construction of Sizewell C if it goes ahead. SLAF have already made comments to EDF on its concerns relating to access issues both during and after construction involving the possible closure of the coast path route whilst beach landings are in operation and the impact of the construction of new flood defences. We have suggested that these should be made wide enough so the coast path can be relocated on top of defences to future proof it against beach erosion.

SLAF are looking forward to receiving the reports on the final sections of the England Coast Path in Suffolk, the Deben Estuary from Felixstowe Ferry to Bawdsey, and from Bawdsey to Aldeburgh.

Natural England's comments

Natural England welcomes the supportive comments of Suffolk Local Access Forum in relation to our report for AHS 2: Sizewell to Dunwich.

Section 1.2.18 of our Coastal Access Report identifies how the continuity of access along the England Coast Path can be maintained at Sizewell if the proposed developments there go ahead. This can be done through the provision of a temporary route for use when the main route is unavailable.

We note that the Access Forum have asked EDF to make the new flood defences wide enough to enable the coast path to be relocated on top of them to future proof it against beach erosion.

Relevant appended documents (see section 5): N/A

Representation number:

MCA/AHS2/R/4/AHS0862

Organisation/ person making representation: Nigel

Meadows for Ramblers Association

Route section(s) specific to this representation: AHS-2-S05

to AHS-2-S064

Other reports within stretch to which this representation also relates:

AHS 1 and AHS 3

Representation in full

See first instance of representation under AHS1.

Natural England's comments

Natural England welcomes the Rambler Association's support for key aspects of our proposals in Chapter Report AHS 2: Sizewell to Dunwich.

Unfortunately, we were not able to propose a cliff top route from section AHS-2-S028 to AHS2S047 because large areas of the cliff top were covered by buildings and their curtilage and also areas used as garden. Figure 1 in the Coastal Access Approved Scheme outlines that these land categories are excepted from coastal access rights. We did consider a beach alignment here, as detailed in section 2.3.2 of our proposals, however we observed there was no access from the beach to the cliff top to enable an onward journey, so opted for the proposed inland route on the cliff top.

Relevant appended documents (see section 5):N/A

Representation number:

MCA/AHS2/R/5/AHS0891

Organisation/ person making representation:

[Redacted] for RSPB

Route section(s) specific to this representation:

AHS 2 – Sizewell to Dunwich, Map AHS 2e
(stretch including RSPB Dingle - South)

Other reports within stretch to which this representation also relates:

N/A

Representation in full

We support the proposed route which seeks to avoid Coast Path users having to walk along the road between sections AHS-2-S058 and AHS-2-S064. We seek confirmation that the responsibility for management and maintenance of any new structures installed (including the bridge) does not transfer to the RSPB. We also seek to agree with NE an appropriate specification for these works, given our need to graze this field. Signage instructing walkers to keep dogs on leads when livestock are present should be provided. We also note that at this point, it would be possible for walkers to walk across the nature reserve and therefore request that the signage is also clear that walkers should stay on the path and that a short section of fence is provided to prevent access onto the reserve and to provide appropriate separation between walkers and livestock and ensure appropriate levels of biosecurity.

We also recommend that additional signage is provided to encourage walkers to use the Coast Path route inland rather than walk along the beach at the junction with a path to the beach near AHS-3-S009 FP and near Beach Road at AHS-2-S053FP.

We agree that monitoring of the impacts of the path and the effectiveness of mitigation measures will be required and would welcome discussions with the RO to review the results of this. We wish to note, however, that while we carry out our own monitoring in line with our reserve management plans, we do not have sufficient resource to carry out the additional monitoring needed in relation to the new coast path.

We are also concerned about the effectiveness of mitigation measures, particularly in relation to areas of spreading room excluded under s26 of the Countryside and Rights of Way Act (2000) (nature conservation) and where signage is used to encourage walkers to avoid sensitive areas for wildlife. Whilst we understand that the increase in the numbers of walkers and changes to the patterns of access are likely to be small, we consider it is essential that excluded areas are clearly marked on the ground and that signage is carefully located. We recommend that monitoring of the effectiveness of these measures is carried out and consider that further mitigation may be needed if mapping and signage are not sufficient to enforce these restrictions.

Natural England's comments

We welcome the RSPB's support for our proposed route between sections AHS-2-S058 and AHS-2-S064 and can confirm that the responsibility for management and maintenance of any new structures installed (including the bridge) does not transfer to the RSPB. The ongoing management and maintenance of the trail and any infrastructure associated with it will be undertaken by Suffolk County Council who are the local Access Authority. As a National Trail the England Coast Path will also receive a contribution towards this work from Natural England, in accordance with the national funding arrangements in place at the time.

Fencing

Section 8.2 of The Coastal Access Approved Scheme states "*A great deal of land grazed by cattle has public access, showing that the two uses are generally compatible. Concerns are significantly more likely where people bring dogs with them. Two national requirements help to address these concerns: It is an offence under the Dogs (Protection of Livestock) Act 1953 to allow dogs to attack or chase livestock. On land with coastal access rights, people are required to keep dogs on short leads in the vicinity of livestock – see section 2.4.*" In light of this we do not feel fencing will be necessary in order to separate walkers from livestock.

The Access Authority, Suffolk County Council, will liaise with the RSPB at establishment stage to agree an appropriate specification for the establishment of the trail between route sections AHS-2-S058 and AHS-2-S064, including clear waymarking and signage asking walkers to stay on the path and instructing them to keep dogs on leads when livestock are present. Should the RSPB experience any significant problems associated with people straying off the path despite clear signage asking them to stay on it, further informal management provisions can be explored in liaison with Suffolk County Council. In addition to this Natural England can consider an application for a direction to restrict or exclude access to areas of spreading room seaward of the trail on nature conservation grounds under chapter II of The Countryside and Rights of Way Act 2000 should this prove necessary.

Signage and Interpretation

Section 2.2.7 for AHS 2: Sizewell to Dunwich outlines the measures we propose to protect the environment. These include a new interpretation panel at Coastguard Cottages to discourage walkers from using the beachfront at Minsmere Haven, but if they do use this route, to walk at low tide below the high tide line in order to protect the vegetated shingle and strandline habitats. They also include signage of key access points where walkers can cross the beach to access the water. The location of this signage will be agreed with the Responsible Officer at establishment stage.

In the report we note that there are a number of existing interpretation panels along this beach front, and rather than propose additional signage, such as near Beach Road at AHS2-S053FP, which we feel would clutter up the beach front, we propose that land managers involve the Natural England's Responsible Officer when these panels need to be reviewed to ensure future signs reflect the same advice.

Monitoring

Section 2.2.7 of our proposals for AHS 2: Sizewell to Dunwich outlines where future management of the site after the new coastal access rights have commenced will involve monitoring the effectiveness of the proposed measures.

Natural England's Responsible Officer for the site will work with site managers on this once the proposals have been approved by the Secretary of State. This is in line with 4.9.16 of the government's approved Coastal Access Scheme which states that we will use or adapt existing monitoring activity wherever possible to achieve this, working closely with local and national partners to build on existing best practice in encouraging the participation of local people and users of the trail in helping to identify and solve issues.

Relevant appended documents (see section 5):N/A

Representation number:

MCA/AHS2/R/6/AHS0891

Organisation/ person making representation:

[Redacted] for RSPB

Route section(s) specific to this representation: AHS-2-S007
to AHS-2-S021

Other reports within stretch to which this representation also relates:

N/A

Representation in full

As raised in earlier consultations, to the south of the sluice (AHS-S007-FP to AHS-2-S011), the proposed coastal margin would not be likely to cause ecological concerns, but from a practical point of view, it should be noted that much of the area is inaccessible due to the scrub habitat present.

We welcome the selection of the path at the bottom of the dunes between AHS-2-S011 and AHS-2-S017 rather than the dune ridge, however, the desire line for walkers follows the dune ridge. Interpretation should therefore be provided to discourage use of the ridge and explain its conservation importance.

If alternative routes (to the Minsmere frontage) are required due to roll back arising from coastal change, we request that options are discussed with RSPB.

We are concerned about the proposed locations of signage to discourage route users from walking the whole beach frontage at Minsmere Haven and their likely effectiveness. The proposals include signage and interpretation to indicate key access points where route users can cross the beach to the water without affecting vegetated shingle habitats, however, the signage at and around these access points does not appear to be indicated on the relevant maps. The interpretation at Coastguard Cottages will not be sufficient to ensure that these

access points alone will be used, as not all walkers will access the beach from this location and those that do may not be able to identify the exact locations where access is encouraged without further signs to highlight these points. Given that the habitat along this frontage supports annual vegetation of drift lines and perennial vegetation of stony banks, which are features of the Minsmere to Walberswick Heaths and Marshes Special Area of Conservation, we consider that additional signage (and monitoring of their effectiveness) will be required.

We note the statement (Table 2.2.7, Report AHS 2) that: Future management of the site after the new coastal access rights have commenced will involve monitoring the effectiveness of signage measures and levels of trampling of route and wider margin. This will be reviewed on a regular basis in agreement between the RO and site managers, with the RO to address any issues raised. We agree that monitoring of the impacts of the path and the effectiveness of mitigation measures will be required and would welcome discussions with the RO to review the results of this. We wish to note, however, that while we carry out our own monitoring in line with our reserve management plans, we do not have sufficient resource to carry out the additional monitoring needed in relation to the new coast path.

We are also concerned about the effectiveness of mitigation measures, particularly in relation to areas of spreading room excluded under s26 of the Countryside and Rights of Way Act (2000) (nature conservation) and where signage is used to encourage walkers to avoid sensitive areas for wildlife. Whilst we understand that the increase in the numbers of walkers and changes to the patterns of access are likely to be small, we consider it is essential that excluded areas are clearly marked on the ground and that signage is carefully located. We recommend that monitoring of the effectiveness of these measures is carried out and consider that further mitigation may be needed if mapping and signage are not sufficient to enforce these restrictions.

Natural England's comments

We acknowledge that some areas of the coastal margin will be inaccessible due to the presence of scrub. Section 4.8.2 of The Coastal Access Approved Scheme advises that there is no duty on Natural England to make it possible for the public to reach all parts of the coastal margin on foot. Accordingly, we do not propose to undertake any scrub clearance in the coastal margin on the section of coast covered by our proposals in Coastal Access Report AHS 2: Sizewell to Dunwich.

Signage and Interpretation

We welcome the RSPB's support for our proposed route at the bottom of the dunes between sections AHS-2-S011 and AHS-2-S017. This route was carefully chosen in liaison with local stakeholders to protect the sensitive features of the site and will be clearly waymarked to make it easy for walkers to stick to the trail. The dune ridge sits within the coastal margin seaward of the trail and is already well walked by local people. We do not expect the patterns and levels of access here will change significantly as a result of the introduction of the new coastal access rights and therefore haven't proposed any new interpretation on the ridge itself.

Section 2.2.7 for AHS 2: Sizewell to Dunwich outlines the measures we propose to protect the environment. These include a new interpretation panel at Coastguard Cottages to discourage walkers from using the beachfront at Minsmere Haven, but if they do use this route, to walk at low tide below the high tide line in order to protect the vegetated shingle and strandline habitats. They also include signage of key access points where walkers can cross the beach to access the water. The exact locations of these signs cannot be shown accurately on our report maps, but we would like to reassure the RSPB that they will be identified on the ground in liaison with the Natural England's Responsible Officer at establishment stage.

In this section of the report, we note that there are a number of existing interpretation panels along this beach front, and rather than propose additional signage which we feel would clutter up the beach front, we propose that land managers involve Natural England's Responsible Officer when these panels need to be reviewed to ensure future signs reflect the same advice.

Roll back

Natural England can confirm that if it is no longer possible to find a viable route seaward of the designated sites at Minsmere's SSSI, SAC, SPA, and Ramsar, we will choose a new route after detailed discussions with the relevant experts and with any potentially affected owners or occupiers. This is outlined in section 2.3.3 of our proposals for AHS 2: Sizewell to Dunwich.

Monitoring

Section 2.2.7 of our proposals for AHS 2: Sizewell to Dunwich outlines where future management of the site after the new coastal access rights have commenced will involve monitoring the effectiveness of the proposed measures.

Natural England's Responsible Officer for the site will work with site managers on this once the proposals have been approved by the Secretary of State. This is in line with 4.9.16 of the government's approved Coastal Access Scheme which states that we will use or adapt existing monitoring activity wherever possible to achieve this, working closely with local and national partners to build on existing best practice in encouraging the participation of local people and users of the trail in helping to identify and solve issues.

Relevant appended documents (see section 5):N/A

Representation number:

MCA/AHS2/R/9/AHS0857

Organisation/ person making representation:

[Redacted] for Suffolk County
Council

Route section(s) specific to this representation: AHS-2-S001

FP to AHS-2-S064

Other reports within stretch to which this representation also relates:

N/A

Representation in full

Suffolk County Council welcome these proposals for the England Coast Path from Sizewell to Dunwich.

We welcome the use of roll back as this will enable the continued existence and use of the trail in conjunction with coastal processes, without reliance on public rights of way that have fixed positions.

Mitigation works

We welcome that some of the measures being proposed to protect the environment will be maintained by the reserve managers.

However, the County Council is concerned that other implementation works proposed as mitigation in order to fulfil the objectives of the Habitat Regulations, are not included in the maintenance grant funding formula for National Trails and believe that they should be.

This includes:-

- 20-30m rope fence on Dunwich beach in the coastal margin and not on the main trail (AHS-2e north of AHS-2-S54)

As a public body the County Council must have regard to the purpose of conserving biodiversity (NERC Act 2006), so this could result in disproportionate pressure on the use of the maintenance funding for this stretch.

Overall, the County Council believes that the proposals for improving coastal access on this stretch of the coast strikes the appropriate balance between public and private interests and recreational and environmental objectives as required by the approved coastal access scheme.

Natural England's comments

Natural England welcomes Suffolk County Council's support for our proposals between Sizewell and Dunwich.

Natural England would like to clarify that the rope fence referred to in this representation, is proposed on Dunwich beach in the coastal margin seaward of route sections AHS-2-S055 to AHS-2-S064, Map AHS 2e. Its purpose is to demarcate a seasonal exclusion in the margin between 1st April and 31st August each year to protect ground nesting birds. This is explained in the table at section 2.2.7 of our report AHS 2: Sizewell to Dunwich.

Natural England funds all the costs associated with the establishment of the trail and any associated mitigation works identified in both our Habitats Regulation Assessment and Nature

Conservation Assessments. Thereafter we make a regular contribution to the ongoing management and maintenance of the trail and any infrastructure associated with it. This contribution is made in accordance with the national funding arrangements in place at the time.

Natural England don't 'specify' how National Trail maintenance funding should be spent and in the early years we are not expecting newly installed infrastructure to need much maintenance. As the Access Authority, Suffolk County Council can therefore use their contributions in the early years to stockpile materials that could be used to replace structures such as the rope fence on Dunwich beach further down the line.

The current funding formula is due to be reviewed in the light of the experiences of developing the England Coast Path and given the need to maintain mitigation works associated with Habitat Regulation Assessments. Natural England expect this to happen next year which means it would coincide with the completion of England Coast Path establishment.

Relevant appended documents (see section 5):N/A

Other representations

Representations containing similar or identical points

Representation ID

Organisation/ person making representation:

MCA/AHS2/R/7/AHS1484

[Redacted], [redacted] and [redacted]

MCA/AHS2/R/1/AHS1480

[redacted]

MCA/AHS2/R/2/AHS1481

[redacted]

Name of site:

Sizewell and Thorpness

Report map reference: AHS

2a to 2e

Route sections on or adjacent to the land: AHS-2-S001

FP to AHS-2-S064

Other reports within stretch to which this representation also relates

N/A

Summary of point:

Support is expressed for the England Coast Path Project.

Natural England's comment:

Natural welcomes the support for the England Coast Path.

Relevant appended documents (see Section 5):N/A

Representations containing similar or identical points

Representation ID

Organisation/ person making representation:

MCA/AHS2/R/7/AHS1484

[Redacted], [redacted] and [redacted]

MCA/AHS2/R/1/AHS1480

[redacted]

MCA/AHS2/R/2/AHS1481

[redacted]

Name of site:

Sizewell and Thorpness

Report map reference: AHS

2a

Route sections on or adjacent to the land: AHS-2-S001

FP to AHS-2-S007 FP

Other reports within stretch to which this representation also relates

N/A

Summary of point:

Concern is expressed about the impact of the proposed construction of Sizewell C which would block the path for a decade.

Natural England's comment:

Natural England acknowledges that if the proposed construction of Sizewell C is approved it could impact on the route of the England Coast Path for a number of years. However, there are powers under section 551 of the 1949 Act to provide temporary routes for the trail, at times when access to the ordinary route is unavailable. These are outlined in Figure 17 of The Coastal Access Approved Scheme.

Section 1.2.18 of our Coastal Access Report AHS 1: Aldeburgh to Sizewell identifies that these powers can be used to provide a temporary route to ensure the continuity of access along the England Coast Path at Sizewell if the proposed developments there go ahead.

Relevant appended documents (see Section 5):

Representations containing similar or identical points

Representation ID

Organisation/ person making representation:

MCA/AHS2/R/7/AHS1484

[Redacted], [redacted] and [redacted]

MCA/AHS2/R/1/AHS1480

[redacted]

MCA/AHS2/R/2/AHS1481

[redacted]

Name of site:

Sizewell and Thorpness

Report map reference: AHS

2a

Route sections on or adjacent to the land: AHS-2-S001

FP to AHS-2-S007 FP

Other reports within stretch to which this representation also relates

N/A

Summary of point:

The report hasn't taken into account the detrimental effect of the further offshore wind projects, which will effect this stretch of the coast path.

Natural England's comment:

Our report to the Secretary of State aims to take full account of any change in the use of the land across which we propose to align the coast path which can reasonably be foreseen at the time that we prepare our initial proposals to the Secretary of State.

East Anglia One North and East Anglia Two offshore windfarms were at pre application stage when we were developing our proposals for this stretch of coast. Natural England considered the impact they could have on the England Coast Path and commented on this in the pre application advice we offered. We did not identify any impacts that required us to make any special provisions in our proposals. We apologise however for not mentioning these developments in our Overview document.

It should be noted that there are powers in the legislation which enables the England Coast Path to cope with any developments that occur subsequently such as:

- Powers to provide temporary routes for the trail, at times when access to the ordinary route is unavailable, such as when a development is taking place. These are outlined in Figure 17 of The Coastal Access Approved Scheme.
- Powers to amend the route after the report is confirmed, if this is necessary as a result of changes in the use of affected land which could not be foreseen at the time when we made our initial proposals. We do this by submitting a variation report to the Secretary of State as outlined in section 5.5.4 of The Coastal Access Approved Scheme.

Relevant appended documents (see Section 5):

Representation ID:

MCA/AHS2/R/8/AHS1485

Organisation/ person making representation:

[Redacted] for The Woodland Trust

Name of site: Greyfriar's

Wood

Report map reference: AHS

2e

Route sections on or adjacent to the land: AHS-2-S048

Other reports within stretch to which this representation also relates

AHS 4

Summary of representation:

The Woodland Trust requests that the impact of the route on the ancient woodland is limited as far as is possible, because ancient woodland is irreplaceable.

The Trust asks that where possible, no new infrastructure or paths are constructed within any areas of ancient woodland. Similarly, we ask that for any proposed upgrades to paths within ancient woodland, the footprint of the existing path is not extended into the sensitive ancient woodland soils.

If the creation of new infrastructure or paths within ancient woodland is unavoidable, the Trust requests that compaction of the soil is limited by reducing access to heavy machinery, and there is no unnecessary removal of woodland vegetation.

Natural England's comment:

Natural England agree with the Woodland Trust that the impact of the trail on the ancient woodland should be limited as far as possible. We have therefore ensured our proposals reflect the current patterns of access within the woodland.

The proposals table in our report AHS 2: Sizewell to Dunwich in section 2.3.1 outline that route section number AHS-2-S048 shown on Map AHS 2e will follow an existing walked route on the seaward edge of Greyfriars Wood. The only path upgrade we propose is a small set of steps installed on an existing walked slope on the seaward edge of the woods to make it easier for walkers to negotiate.

Whilst we propose the whole woodland comes into the coastal margin, we do not propose that any new infrastructure or paths are created within the main body of the woodland itself. There is on-going erosion along this length of coast so we have also proposed that the route should roll back inland as the coast changes, in a way that maintains the coast path on the seaward side of the woodland.

Relevant appended documents (see Section 5):N/A

Representation ID:

MCA/AHS2/R/11/AHS1458

Organisation/ person making representation:

[Redacted] for Disabled Ramblers

Name of site:

Sizewell to Dunwich

Report map reference:

Maps AHS 2a to AHS 2e

Route sections on or adjacent to the land: AHS-2-S001

FP to AHS-2-S064

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

Report AHS 2: Maps 2d and 2e, all route sections generally

There are a significant and increasing number of people with reduced mobility using all-terrain mobility scooters and other mobility vehicles to enjoy routes on rugged terrain in the countryside. 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.

These people have the same legitimate right of access that walkers do, so Natural England should ensure that any existing or new infrastructure along the Coast Path does not present a barrier to their ability to progress along the Coast Path. Natural terrain will, in places, prevent access and this is unavoidable, however man-made infrastructure can be changed.

Paths should be maintained at a sufficient width for use by all-terrain mobility vehicles, including where the Coast Path route follows field edges. New paths should be planned and built with mobility vehicles in mind.

There are instances where Natural England's maps show it is intended to retain structures or introduce new ones. Careful consideration must be given to those with limited mobility, particularly those using mobility vehicles. Disabled Ramblers requests that Natural England:

- address with the necessary parties involved, the issue of existing man-made structures that are a barrier to those who use mobility vehicles and enable changes to be made to allow people who use these vehicles to enjoy the England Coast Path in this area.
- ensure that all existing and proposed new structures along the Coast Path are suitable for those who use large mobility vehicles, changing infrastructure as needed, and complying with *British Standard BS5709: 2018 Gaps Gates and Stiles*.
- comply with the Equality Act 2010 (and the Public Sector Equality Duty within this act)
- comply with the Countryside Rights of Way Act 2000
- follow the advice in the attached document *Disabled Ramblers*

Map AHS 2e, Route sections AHS-2-S044 to AHS-2-S058

At AHS-2-S048 new steps are proposed, and at AHS-2-S053 there are existing steps. These are a barrier to those who use mobility vehicles.

Disabled Ramblers request that a signed diversion is created for users of mobility vehicles to allow them to continue along the coast path. The diversion would begin at AHS-2-S044, divert along Westleton Road and St Janes Street, and re-join the trail at AHS-2-S058.

However, at the end of the diversion, where route section AHS-2-S058 is joined, there is an existing field gate, and it is proposed that a new kissing gate is installed beside it.

To be accessible to mobility vehicles, the new kissing gate would need to be a large kissing gate (see attached *Disabled Ramblers Notes on Infrastructure*) which would take up a lot of room. Disabled Ramblers request that a two way self-closing pedestrian gate is installed instead beside the field gate.

Natural England's comment:

Section 4.3 of the Scheme – ‘Adjustments for disabled people and others with reduced mobility’ guides our approach to aligning the trail to ensure that it is as inclusive as possible. ” Section 4.3.8 states,

“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 (see section below). Where there is a choice of routes (after taking into account all the key principles in chapters 4 and 5 of the Scheme), we favour the one that is accessible to the widest range of people or most easily adapted for that purpose.

Throughout the trail, we avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.”

Natural England can confirm that we have adhered to this guide in developing our proposals in report AHS 2: Sizewell to Dunwich.

The framework within which Natural England deliver the England Coast Path does not give us the scope to put in place diversions from the main route, where it's not suitability for mobility scooters, in order to enable them to continue along the coast. The Disabled Ramblers can however explore this idea with the Access Authority, Suffolk County Council, to see if it can be achieved as part of future route enhancements.

Relevant appended documents (see Section 5):N/A

Representation ID:

MCA/AHS2/R/10/AHS1422

Organisation/ person making representation:

[Redacted] for EDF Energy

Name of site: Sizewell

Report map reference:

Map AHS 2a

Route sections on or adjacent to the land: AHS-2-S003
to AHS-2-S007

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

EDF Energy ('EDF') is the owner and operator of the Sizewell B power station, and EDF (SZC C.) is proposing to build a new nuclear power station (Sizewell C) to the north of Sizewell B.

We understand and support the legal duty, under section 296 of the Marine and Coastal Access Act 2009, on Natural England to secure a route around the whole of the English coast within a margin of land for the public to enjoy. We also though believe that issues arising from routing the England Coast Path through our landholding at Sizewell need to be very carefully considered, to ensure that there is no impact on the security, safe operation and future decommissioning of Sizewell B power station; and also as it is routed through land that is a nominated site in the Government's National Policy Statement for Nuclear Power Generation (NPS EN-6), and will form part of the application for our proposed Sizewell C power station.

We welcome the commitment in Section 6e) of the Overview report that "*Protection of the nuclear power station at Sizewell is important to the national interest*" and also in Section 7 to the alternative routes that would be used during the proposed construction (and occasionally post-construction) of Sizewell C.

Our representation is for the following points to be formally addressed as part of this determination stage:

1. Map AHS 2a shows the proposed landward coastal margin extending up to the edge of the existing Sizewell B and proposed Sizewell C power stations. From the plan it is not possible to accurately confirm where the coastal margin would extend to on its landward, western edge, but we understand it is proposed to be the physical boundary of Sizewell B Power Station. The Sizewell B Nuclear Site Licence (NSL) boundary extends beyond the physical boundary of the Station and, as such, it needs to be made clear that all land within the NSL would be excepted land, in line with the provisions of the Countryside and Rights of Way Act 2000 "*The following land categories are excepted in full... land covered by works used for the purposes of a statutory undertaking (other than flood defence works or sea defence works) or the curtilage of such land*". This would also be applicable in future to the proposed Sizewell C power station. As such, EDF require that the exact alignment of the landward, western edge of the coastal margin is defined accurately on the ground, ensuring that all

land within the NSL and curtilage of Sizewell B is excepted, before it is agreed and finalised, and the map modified accordingly.

2. During the implementation phase of the new Coast Path, we would need this to take full account of our requirements in respect to the safe and secure operation of Sizewell B power station (including during maintenance outages and future decommissioning), and construction of Sizewell C, as well as full account of the emergency planning arrangements for the power stations, in which Suffolk County Council has a role.
3. In line with Point 2, we would require all implementation works, including any intrusive works, on our landholding to be agreed with ourselves in advance, and fully risk assessed by us to ensure there is no impact on our power station services, infrastructure or safety case.
4. We request that any new way-marking only demarcates the Coast Path itself, and all reasonable provisions are made to ensure no one strays beyond the Coast Path, and its associated coastal margin (noting our comment in respect to the 'coastal margin' in Point 1 above). It should also be noted that our land at Sizewell is policed by the Civil Nuclear Constabulary, in line with the provisions of The Nuclear Industries Security Regulations 2003; this should be made explicit in all relevant documents, maps and authorisations, as appropriate, so that it is clear to all relevant parties.
5. We request confirmation that Suffolk County Council, on behalf of Natural England would be responsible for maintenance of all infrastructure installed for the Coast Path.

Natural England's comment:

Natural England can confirm that we have not proposed that the landward boundary of the coastal margin adjacent to route sections AHS-2-S003 to AHS-2-S007 is the physical boundary of Sizewell B Power Station.

The proposals table in section 2.3.1 of our report AHS 2: Sizewell to Dunwich indicates that dune is present immediately landward of route sections AHS-2-S003 to AHS-2-S007 and this is a coastal land type that's included automatically in the coastal margin where it falls landward of the trail if it touches it at some point. This abuts land included within Sizewell B Nuclear Site Licence (NSL) which as mentioned in the representation would be excepted from coastal access rights under Schedule 1 to CROW.

It is EDF Energy's responsibility to mark the full extent of the land covered by their Nuclear Site Licences (NSL) on the ground. Natural England would however be happy to provide them with signage indicating that there is no right of access over this land, which can be installed in conjunction with this before the new coastal access rights commence.

Should Natural England's proposals be approved by the Secretary of State the next step would be for Suffolk County Council to discuss the implementation of the proposals on the ground with the relevant owners and managers of the affected land. At this stage EDF energy can discuss the risk assessments required in association with this establishment work. Suffolk County Council will liaise with EDF Energy at this stage to ensure full account is taken of their operational requirements for Sizewell B power station, the construction of Sizewell C, and the emergency planning arrangements for them.

Natural England can confirm that the coast path will be waymarked so walkers can follow it with ease, and that we can also provide signage to mark the extent of people's access rights in the landward margin. We can also confirm that Suffolk County Council will manage and maintain

the coast path, supported by a contribution from Natural England made in accordance with the national funding arrangements in place at the time.

Relevant appended documents (see Section 5):N/A

Length Report AHS3

Full representations Representation

number:

MCA/AHS Stretch/R/3/AHS0857

Organisation/ person making representation:

[Redacted] for Suffolk CC

Route section(s) specific to this representation:

All

Other reports within stretch to which this representation also relates:

N/A

Representation in full

If you require more space for your comments, please continue on a separate sheet.

See first instance of representation under AHS1.

Natural England's comments

See first instance of representation under AHS1.

Relevant appended documents (see section 5): N/A

Representation number:

MCA/AHS Stretch/R/1/AHS0862

Organisation/ person making representation:

[Redacted] for Ramblers Association

Route section(s) specific to this representation:

All

Other reports within stretch to which this representation also relates:

Representation in full

Representation on AHS sections 1 to 6 of Aldeburgh to Hopton-on-Sea

See first instance of representation under AHS1.

Natural England's comments

Natural England welcomes the supportive comments of Suffolk Area Ramblers in relation to our proposals in Coastal Access Reports AHS 1 to 6.

Relevant appended documents (see section 5):N/A

Representation number:

MCA/AHS Stretch/R/2/AHS0891

Organisation/ person making representation:

[Redacted] for RSPB

Route section(s) specific to this representation:

All

Other reports within stretch to which this representation also relates:

N/A

Representation in full

See first instance of representation under AHS1.

Natural England's Comments

See first instance of representation under AHS1.

Relevant appended documents (see section 5):N/A

Representation number:

MCA/AHS3/R/1/AHS0862

Organisation/ person making representation:

[Redacted] for the Ramblers Association

Route section(s) specific to this representation:

AHS-3-S0001 BW to AHS-3-S0080 FW

Other reports within stretch to which this representation also relates:

AHS 1, AHS 2 and AHS3

Representation in full

See first instance of representation under AHS1.

Natural England's comments

Natural England welcomes the Ramblers support for our proposals in report AHS 3: Dunwich to Southwold.

Relevant appended documents (see section 5):N/A

Representation number:

MCA/AHS3/R/2/AHS0891

Organisation/ person making representation:

[Redacted] for the RSPB

Route section(s) specific to this representation:

AHS-3-S001 BW to AHS-3-S080 FW

Other reports within stretch to which this representation also relates:

Representation in full

We welcome the proposals to exclude access to the coastal margin between Dunwich and Walberswick and to parts of the beach used by nesting birds in the breeding season. We recommend that “no access to beach” signage is provided at gateways and other points along the path where access onto the nature reserve would be possible. This is because we are concerned that reliance on marking excluded areas on maps alone may mean that many route users will not be aware of such exclusions.

We also note that around AHS-3-S006 the path can be muddy and difficult to pass throughout the year. Surfacing may be required in this area.

We agree that monitoring of the impacts of the path and the effectiveness of mitigation measures will be required and would welcome discussions with the RO to review the results of this. We wish to note, however, that while we carry out our own monitoring in line with our reserve management plans, we do not have sufficient resource to carry out the additional monitoring needed in relation to the new coast path.

We are also concerned about the effectiveness of mitigation measures, particularly in relation to areas of spreading room excluded under s26 of the Countryside and Rights of Way Act (2000) (nature conservation) and where signage is used to encourage walkers to avoid sensitive areas for wildlife. Whilst we understand that the increase in the numbers of walkers and changes to the patterns of access are likely to be small, we consider it is essential that excluded areas are clearly marked on the ground and that signage is carefully located. We recommend that monitoring of the effectiveness of these measures is carried out and consider that further mitigation may be needed if mapping and signage are not sufficient to enforce these restrictions.

Natural England’s comments

We welcome the RSPB’s support for our proposed access restrictions between Dunwich and Walberswick. It would be inappropriate however for us to erect signage saying “no access to the beach” at gateways and access points, because our proposed restrictions do not include the restriction of year round access to the whole beach as this would suggest.

Our proposed restrictions and exclusions are outlined in sections 3.2.7 and 3.2.12 of our report AHS 3: Dunwich to Southwold and illustrated on Map E. These state that we propose to exclude

access to the saltmarsh seaward of route sections AHS-2-S055 to AHA-3-S034 at Dingle Marshes all year round, and that we proposed to restrict access to the margin within the fenced areas on the beach around breeding birds seaward of the same route sections from 1 April to 31st August each year. These fenced areas will be signed.

The proposed main path between Dunwich and Southwold sits behind the marshland here and offers no route across the marshland towards the beach. Consequently we do not expect use of the shingle areas to change from its existing levels with the establishment of the England Coast Path. We therefore believe the proposed fencing of the Little tern breeding colonies, localised signage explaining its purpose and continued wardening, will be sufficient to avoid walker and dogs entering the nest sites.

We agree that the path at proposed route section AHS-3-S006 can be muddy and difficult to pass throughout the year. Our proposals include surface improvements here as noted in the key of Map AHS 3b - Dingle Marshes North.

We welcome the RSPB's interest in liaising with the Responsible Officer for this section of coast to review the impacts of the path and effectiveness of mitigation, and we note that they do not have sufficient resource to carry out the additional monitoring needed in relation to the new coast path.

A full assessment of any potential impacts of our proposals on wildlife and habitats of local and national importance, and also the sites and designated features of European importance, was undertaken as part of the preparation of our proposals. Our detailed findings in relation to ASH3: Dunwich to Southwold were published alongside our proposals in the following documents:

- Habitat Regulations Assessment of England Coast Path Proposals between Aldeburgh and Hopton on Sea on Sites of European importance for nature conservation 29th January 2020.
- Assessment of Coastal Access Proposals from Sizewell to Dunwich and Dunwich to Southwold on sites and features of nature conservation concern 29th January 2020.

These assessments identified the need for some additional measures to protect the natural environment and we have proposed these in our coastal access report AHS 3: Dunwich to Southwold. We have outlined here where signage and interpretation are proposed and also where future management of the site after the new coastal access rights have commenced will involve monitoring the effectiveness of the proposed measures.

In respect of local and national sites and features of nature conservation concern, the assessment found that in developing the new access proposals the appropriate balance has been struck between Natural England's conservation and access objectives, duties and purposes. In respect of the conservation objectives of European sites, the assessment found that our proposals are fully compatible with the relevant European site conservation objectives and that taking into account any incorporated avoidance and mitigation measures, will not have an adverse effect on their integrity.

Relevant appended documents (see section 5):N/A

Other representations

Representation ID:

MCA/AHS3/R/3/AHS1458

Organisation/ person making representation:

[Redacted] for the Disabled Ramblers

Name of site:

Dunwich to Southwold

Report map reference:

AHS 3a to 3f

Route sections on or adjacent to the land:

AHS-3-S001 BW to AHS-3-S080 FW

Other reports within stretch to which this representation also relates

Summary of representation:

Comment 1.

Report AHS 3: Maps AHS 3a to AHS 3f, all route sections generally

There are 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 walls 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.

These people have the same legitimate right of access that walkers do, so Natural England should ensure that any existing or new infrastructure along the Coast Path does not present a barrier to their ability to progress along the Coast Path. Natural terrain will, in places, prevent access and this is unavoidable, however man-made infrastructure can be changed. Paths should be maintained at a sufficient width for use by all-terrain mobility vehicles, including where the Coast Path route follows field edges. New paths should be planned and built with mobility vehicles in mind.

There are instances where Natural England's maps show it is intended to retain structures or introduce new ones. Careful consideration must be given to how those with limited mobility, particularly those using mobility vehicles will manage these structures. Disabled Ramblers requests that Natural England

- address with the necessary parties involved, the issue of existing man-made structures that are a barrier to those who use mobility vehicles, and enable changes to be made to allow people who use these vehicles to enjoy the England Coast Path in this area.
- ensure that all existing and proposed new structures along the Coast Path are suitable for those who use large mobility vehicles, changing infrastructure as needed, and complying with *British Standard BS5709: 2018 Gaps Gates and Stiles*.
- comply with the Equality Act 2010 (and the Public Sector Equality Duty within this act)

- comply with the Countryside Rights of Way Act 2000
- follow the advice in the attached document *Disabled Ramblers Notes on Infrastructure* which gives general notes with regard to access for users of mobility vehicles.

Comment 2.

Maps AHS 3e and AHS 3f, Route sections AHS-3-S066 to AHS-3-S071 Diversion

Disabled Ramblers request that a signed diversion is created for users of mobility vehicles to allow them to avoid the sand. The diversion would leave the main route at AHS-3-S066 and pass along Ferry Road to re-join the main route at AHS-3-S071

Natural England's comment:

Section 4.3 of the Scheme – ‘Adjustments for disabled people and others with reduced mobility’ guides our approach to aligning the trail to ensure that it is as inclusive as possible.” Section 4.3.8 states,

“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 (see section below). Where there is a choice of routes (after taking into account all the key principles in chapters 4 and 5 of the Scheme), we favour the one that is accessible to the widest range of people or most easily adapted for that purpose.

Throughout the trail, we avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.”

Natural England can confirm that we have adhered to this guide in developing our proposals in report AHS 3: Dunwich to Southwold.

The legislative framework within which Natural England deliver the England Coast Path does not enable us to put in place diversions from the main route, where it’s not suitable for mobility scooters, in order to enable them to continue along the coast. The Disabled Ramblers can however explore this idea with the Access Authority, Suffolk County Council, to see if it can be achieved as part of future route enhancements.

Relevant appended documents (see Section 5): Disabled Ramblers Notes on Infrastructure

Length Report AHS5

Full representations Representation

number:

MCA/AHS Stretch/R/3/AHS0857

Organisation/ person making representation:

[Redacted] for Suffolk CC

Route section(s) specific to this representation:

All

Other reports within stretch to which this representation also relates:

N/A

Representation in full

If you require more space for your comments, please continue on a separate sheet.

See first instance of representation under AHS1.

Natural England's comments

See first instance of representation under AHS1.

Relevant appended documents (see section 5): N/A

Representation number:

MCA/AHS Stretch/R/1/AHS0862

Organisation/ person making representation: [Redacted]

for Ramblers Association

Route section(s) specific to this representation:

All

Other reports within stretch to which this representation also relates:

Representation in full

Representation on AHS sections 1 to 6 of Aldeburgh to Hopton-on-Sea

See first instance of representation under AHS1.

Natural England's comments

Natural England welcomes the supportive comments of Suffolk Area Ramblers in relation to our proposals in Coastal Access Reports AHS 1to 6.

Relevant appended documents (see section 5):N/A

Representation number:

MCA/AHS Stretch/R/2/AHS0891

Organisation/ person making representation:

[Redacted] for RSPB

Route section(s) specific to this representation:

All

Other reports within stretch to which this representation also relates:

N/A

Representation in full

See first instance of representation under AHS1.

Natural England's Comments

See first instance of representation under AHS1.

Relevant appended documents (see section 5):N/A

Representation number:

MCA/AHS5/R/3/AHS0862

Organisation/ person making representation: [Redacted]
for the Ramblers Association

Route section(s) specific to this representation: AHS
5

Other reports within stretch to which this representation also relates:
AHS 4 and 6

Representation in full

Representation on AHS sections 4 to 6 of Aldeburgh to Hopton-on-Sea

This representation is made on behalf of Suffolk Area Ramblers, and is attached to the representation form for the sections AHS4 to AHS6, annotated number 3.

We would like to commend the section AHS4 So06 to So09 as an improvement over the inland track originally surveyed.

We also commend the cliff top route made available at AHS4 So16 as being much better than the routes through the woods that were initially considered.

We welcome the fact that the use of paths through the Denes in AHS4 has been made possible by including restricted access proposals, and support the proposals.

It is appreciated that since the original surveys, sea water has breached the proposed route in three places around Benacre, Covehithe and Easton broads. The Ramblers are therefore happy with the proposal to create the coastal path with three alternative inland routes which will be made available at times when the proposed coastal path is not available. It is assumed that the majority of coastal path users will prefer to be able to walk the route along the beach and will therefore do so at suitable tide times and in reasonable weather. We welcome the use of fenced off areas during the bird breeding season, to accommodate the use of the beach routes.

We are very pleased that NE have been able to find a route through the holiday centre and positive cliff top routes around the Crazy Mary's Hole area and AHS6 So01 and So02, thus avoiding the busy A12.

Members have expressed some disappointment that the route is proposed along a major road south of Corton Cliffs AHS6 So14 to So30, where this holiday village is accepted land, but we are unable to propose an acceptable alternative.

We do however, completely agree that the inland section proposed from AHS So34 to So39 is a more suitable alternative to the bottom of the cliff, and overall approve of the proposed coastal access route in this section.

[Redacted]

Suffolk Area Ramblers Coastal Access Officer
13th March 2020

Natural England's comments

We welcome the Ramblers Association's support for our proposals between Pakefield and Lowestoft.

Relevant appended documents (see section 5):

Representation number:

MCA/AHS5/R/2/AHS0873

Organisation/ person making representation: [Redacted]

for the Suffolk Local Access Forum

Route section(s) specific to this representation: AHS-5-S001

to AHS-5-S038 RD

Other reports within stretch to which this representation also relates:

AHS 5

Representation in full

Thank you for consulting the Suffolk Local Access Forum on the three recently released reports on sections of the England Coast Path in Suffolk. A sub-group of SLAF have examined these reports and are generally pleased with the routes that have been put forward and would like to thank all those involved including Natural England staff, SCC rights of way officers and landowners who have been working together on this project.

We have examined the **Aldeburgh and Hopton-on-Sea report 5** and have set our comments below.

We welcome the decision to keep the English Coast Path adjacent to the sea from Southwold and Lowestoft as the use of roll-back will enable the path to remain as the cliffs are eroded over time.

We have no comments to make regarding the route through Lowestoft and beyond.

SLAF are looking forward to receiving the reports on the final sections of the England Coast Path in Suffolk, the Deben Estuary from Felixstowe Ferry to Bawdsey, and from Bawdsey to Aldeburgh.

Natural England's comments

We welcome Suffolk Local Access Forum's support for proposals between Pakefield and Lowestoft.

Relevant appended documents (see section 5):N/A

Representation number:

MCA/AHS5/R/1/AHS0119

Organisation/ person making representation: [Redacted]

for East Suffolk Council

Route section(s) specific to this representation: AHS-5-S001

to AHS-5-S038 RD

Other reports within stretch to which this representation also relates:

AHS 5

Representation in full

From an economic regeneration perspective, we have no objections as we hope to see the benefit of the path being used by locals and visitors and therefore increasing the number of visitors to our coastal towns and villages. In North Lowestoft Heritage Action Zone Delivery Plan, the coastal path is highlighted as a benefit to the project area and will create ease of pedestrian transition.

We raise a comment / concern that from Ness Point to Hamilton road, there is scope to prevent public access to at Hamilton Road to support / extend the existing port offer.

Representation made on behalf of the Economic Regeneration Team at East Suffolk Council.

Natural England's comments

We welcome East Suffolk Council's support for proposals between Pakefield and Lowestoft.

Section 5.5 of The Coastal Access Approved Scheme looks at changes in the use of affected land and explains that:

5.5.2 There are powers to amend the access arrangements on a section of coast after the report is confirmed, if this is necessary as a result of changes in the use of affected land which could not be foreseen at the time when we made our initial proposals.

Should the trail need to be realigned to enable an extension of the port, Natural England will work with affected landowners and local stakeholders to vary the route of the trail and submit a variation report to the Secretary of State recommending a change to it.

Relevant appended documents (see section 5):N/A

Other representations

Representation ID:

MCA/AHS5/R/4/AHS1458

Organisation/ person making representation:

[Redacted] for the Disabled Ramblers

Name of site:

Pakefield to Lowestoft

Report map reference:

AHS 5a to AHS 5d

Route sections on or adjacent to the land:

AHS-5-S001 to AHS-5-S038 RD

Other reports within stretch to which this representation also relates

AHS 6

Summary of representation:

Comment 1.

Report AHS 5, Maps AHS 5a to AHS 5d: all route sections generally

There are 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, cliff tops and some sea walls 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.

These people have the same legitimate right of access that walkers do, so Natural England should ensure that any existing or new infrastructure along the Coast Path does not present a barrier to their ability to progress along the Coast Path. Natural terrain will, in places, prevent access and this is unavoidable, however man-made infrastructure can be changed. Paths should be maintained at a sufficient width for use by all-terrain mobility vehicles, including where the Coast Path route follows field edges. New paths should be planned and built with mobility vehicles in mind.

There are instances where Natural England's maps show it is intended to retain structures or introduce new ones. Careful consideration must be given to how those with limited mobility, particularly those using mobility vehicles will manage these structures.

Disabled Ramblers requests that Natural England

- address with the necessary parties involved, the issue of existing man-made structures that are a barrier to those who use mobility vehicles, and enable changes to be made to allow people who use these vehicles to enjoy the England Coast Path in this area.
- ensure that all existing and proposed new structures along the Coast Path are suitable for those who use large mobility vehicles, changing infrastructure as needed, and complying with *British Standard BS5709: 2018 Gaps Gates and Stiles*.
- comply with the Equality Act 2010 (and the Public Sector Equality Duty within this act)
- comply with the Countryside Rights of Way Act 2000
- follow the advice in the attached document *Disabled Ramblers Notes on Infrastructure* which gives general notes with regard to access for users of mobility vehicles.

Comment 2.

Map AHS 5d, Car park near AHS-5-S037 and AHS-5-S038: access to Coast Path This car park is well positioned to allow those using pavement scooters and manual wheelchairs to access the Coast Path to the south, and to allow those using all-terrain mobility vehicles to access the Coast Path to the north. However accessing the Coast Path in either direction is not possible.

A. On the coast side of the car park there is a raised kerb between the car park and the Coast Path route preventing access to the south for those with pavement scooters or manual wheelchairs:



Disabled Ramblers requests that non-stepped access points are provided at intervals along the length of the car park, and that they are marked to prevent cars parking beside them and blocking the way. B. Across the road from the car park there is a kissing gate preventing access to the north for those with all-terrain mobility vehicles:



Disabled Ramblers requests that this structure is replaced with a gap, or a structure suitable for use by large mobility vehicles (see attached Disabled Ramblers Notes on Infrastructure).

Natural England's comment:

Section 4.3 of the Scheme – ‘Adjustments for disabled people and others with reduced mobility’ guides our approach to aligning the trail to ensure that it is as inclusive as possible. ” Section 4.3.8 states, *“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 (see section below). Where there is a choice of routes (after taking into account all the key principles in chapters 4 and 5 of the Scheme), we favour the one that is accessible to the widest range of people or most easily adapted for that purpose.*

Throughout the trail, we avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.”

Natural England can confirm that we have adhered to this guide in developing our proposals in report AHS 5: Pakefield to Lowestoft.

The framework within which Natural England deliver the England Coast Path does not give us the scope to improve access onto the trail across land where no coastal access rights are proposed. The Disabled Ramblers can however explore this idea with the Access Authority, Suffolk County Council and the owners of the car park to see if it can be achieved as part of future route enhancements.

Natural England have contacted Suffolk Wildlife Trust who own and manage Gunton Warren which is accessed by the kissing gate at the start of route section AHS-6-S001. They have advised us that the site suffers greatly from illegal quad bike and motor bike use which they feel would increase by removing or widening this structure. We therefore are unable to agree to this proposed modification to our proposals.

Relevant appended documents (see Section 5):

Disabled Ramblers notes on Infrastructure

Length Report AHS6

Full representations Representation**number:**

MCA/AHS Stretch/R/3/AHS0857

Organisation/ person making representation:

[Redacted] for Suffolk CC

Route section(s) specific to this representation:

All

Other reports within stretch to which this representation also relates:

N/A

Representation in full

If you require more space for your comments, please continue on a separate sheet.

See first instance of representation under AHS1.

Natural England's comments

See first instance of representation under AHS1.

Relevant appended documents (see section 5): N/A

Representation number:

MCA/AHS Stretch/R/1/AHS0862

Organisation/ person making representation: [Redacted]

for Ramblers Association

Route section(s) specific to this representation:

All

Other reports within stretch to which this representation also relates:

Representation in full

Representation on AHS sections 1 to 6 of Aldeburgh to Hopton-on-Sea

See first instance of representation under AHS1.

Natural England's comments

Natural England welcomes the supportive comments of Suffolk Area Ramblers in relation to our proposals in Coastal Access Reports AHS 1 to 6.

Relevant appended documents (see section 5):N/A

Representation number:

MCA/AHS Stretch/R/2/AHS0891

Organisation/ person making representation:

[Redacted] for RSPB

Route section(s) specific to this representation:

All

Other reports within stretch to which this representation also relates:

N/A

Representation in full

See first instance of representation under AHS1.

Natural England's Comments

See first instance of representation under AHS1.

Relevant appended documents (see section 5):N/A

Representation number:

MCA/AHS6/R/1/AHS0119

Organisation/ person making representation: [Redacted]

East Suffolk Council

Route section(s) specific to this representation: AHS-6-S001

to AHS-6-S041CP

Other reports within stretch to which this representation also relates:

N/A

Representation in full

From an economic regeneration perspective, we have no objections as we hope to see the benefit of the path being used by locals and visitors and therefore increasing the number of visitors to our coastal towns and villages. In North Lowestoft Heritage Action Zone Delivery Plan, the coastal path is highlighted as a benefit to the project area and will create ease of pedestrian transition.

We raise a comment / concern that from Ness Point to Hamilton road, there is scope to prevent public access to at Hamilton Road to support / extend the existing port offer.

Representation made on behalf of the Economic Regeneration Team at East Suffolk Council.

Natural England's comments

We welcome East Suffolk Council's support for proposals between Lowestoft and Hopton-on-Sea.

Section 5.5 of The Coastal Access Approved Scheme looks at changes in the use of affected land and explains that:

5.5.2 There are powers to amend the access arrangements on a section of coast after the report is confirmed, if this is necessary as a result of changes in the use of affected land which could not be foreseen at the time when we made our initial proposals.

Should the trail need to be realigned to enable an extension of the port, Natural England will work with affected landowners and local stakeholders to vary the route of the trail and submit a variation report to the Secretary of State recommending a change to it.

Relevant appended documents (see section 5):

Representation number:

MCA/AHS6/R/2/AHS0862

Organisation/ person making representation: [Redacted]

for the Ramblers Association

Route section(s) specific to this representation: AHS-6-S001

to AHS-6-S041CP

Other reports within stretch to which this representation also relates:

AHS 4 and AHS 5

Representation in full

See first instance of representation under AHS5.

Natural England's comments

We welcome the Ramblers Association's support for our proposals between Lowestoft and Hopton-on-Sea.

Relevant appended documents (see section 5):

Other representations

Representation ID:

MCA/AHS6/R/4/AHS1458

Organisation/ person making representation:

Rhiannon Robinson for the Disabled Ramblers

Name of site:

Lowestoft to Hopton-on-Sea

Report map reference:

AHS 6a to AHS 6c

Route sections on or adjacent to the land:

AHS-6-S001 to AHS-6-S041CP

Other reports within stretch to which this representation also relates

Summary of representation:

If you require more space for your comments, please continue on a separate sheet.

Comment 1.

Report AHS 6 , Maps AHS 6a to AHS 6c: all route sections generally

There are 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, cliff tops and some sea walls 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.

These people have the same legitimate right of access that walkers do, so Natural England should ensure that any existing or new infrastructure along the Coast Path does not present a barrier to their ability to progress along the Coast Path. Natural terrain will, in places, prevent access and this is unavoidable, however manmade infrastructure can be changed.

Paths should be maintained at a sufficient width for use by all-terrain mobility vehicles, including where the Coast Path route follows field edges. New paths should be planned and built with mobility vehicles in mind.

There are instances where Natural England's maps show it is intended to retain structures or introduce new ones. Careful consideration must be given to how those with limited mobility, particularly those using mobility vehicles will manage these structures. Disabled Ramblers requests that Natural England

- address with the necessary parties involved, the issue of existing man-made structures that are a barrier to those who use mobility vehicles, and enable changes to be made to allow people who use these vehicles to enjoy the England Coast Path in this area.
- ensure that all existing and proposed new structures along the Coast Path are suitable for those who use large mobility vehicles, changing infrastructure as needed, and complying with *British Standard BS5709: 2018 Gaps Gates and Stiles*.
- comply with the Equality Act 2010 (and the Public Sector Equality Duty within this act)
- comply with the Countryside Rights of Way Act 2000
- follow the advice in the attached document *Disabled Ramblers Notes on Infrastructure* which gives general notes with regard to access for users of mobility vehicles.

Comment 2.

Maps 6a AHS-6-S001 to AHS-6-S009: Gunton Warren , Dunes and Cliff

Much of this area is not accessible to mobility vehicles, and it is not possible to progress in a linear route, so a diversion for mobility vehicles should be signed from the car park at AHS-6S001 on Map 6a, along Links Road, Corton Road, re-joining the Coast Path at AHS-6-S009

Natural England's comment:

Section 4.3 of the Scheme – ‘Adjustments for disabled people and others with reduced mobility’ guides our approach to aligning the trail to ensure that it is as inclusive as possible. ” Section 4.3.8 states, *“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 (see section below). Where there is a choice of routes (after taking into account all the key principles in chapters 4 and 5 of the Scheme), we favour the one that is accessible to the widest range of people or most easily adapted for that purpose.*

Throughout the trail, we avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.”

Natural England can confirm that we have adhered to this guide in developing our proposals in report AHS 6: Lowestoft to Hopton on Sea.

The legislative framework within which Natural England deliver the England Coast Path does not enable us to put in place diversions from the main route, where it’s not suitability for mobility scooters, in order to enable them to continue along the coast. The Disabled Ramblers can however explore this idea with the Access Authority, Suffolk County Council, to see if it can be achieved as part of future route enhancements.

Relevant appended documents (see Section 5):

Disabled Ramblers notes on Infrastructure

5. Supporting documents

Design Proposal to increase step free access to the beach, MCA/AHS1/R/8/AHS0475 - [redacted] of Thorpeness Coastal Futures Group.

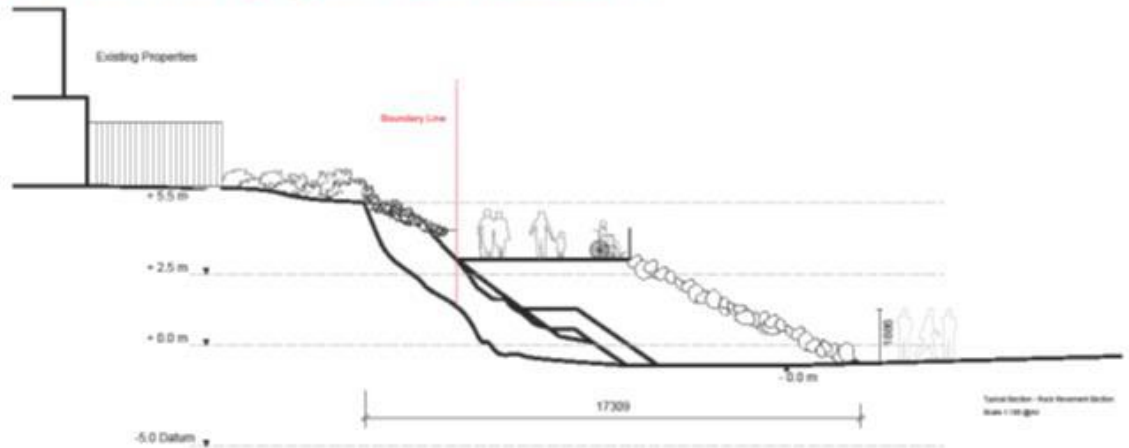
2 Proposal
2.1 Improved access to Thorpeness



3 Proposal
3.2 Improved access beach for users: zones



3 Proposal
3.1 Rock Armour to reinforce existing dunes that can provide step free access routes



1 Celebrate Thorness as traditional holiday village



2 Create an integrated sea defence that protects the village and coastline.



3 Improved access and space for the community to enjoy



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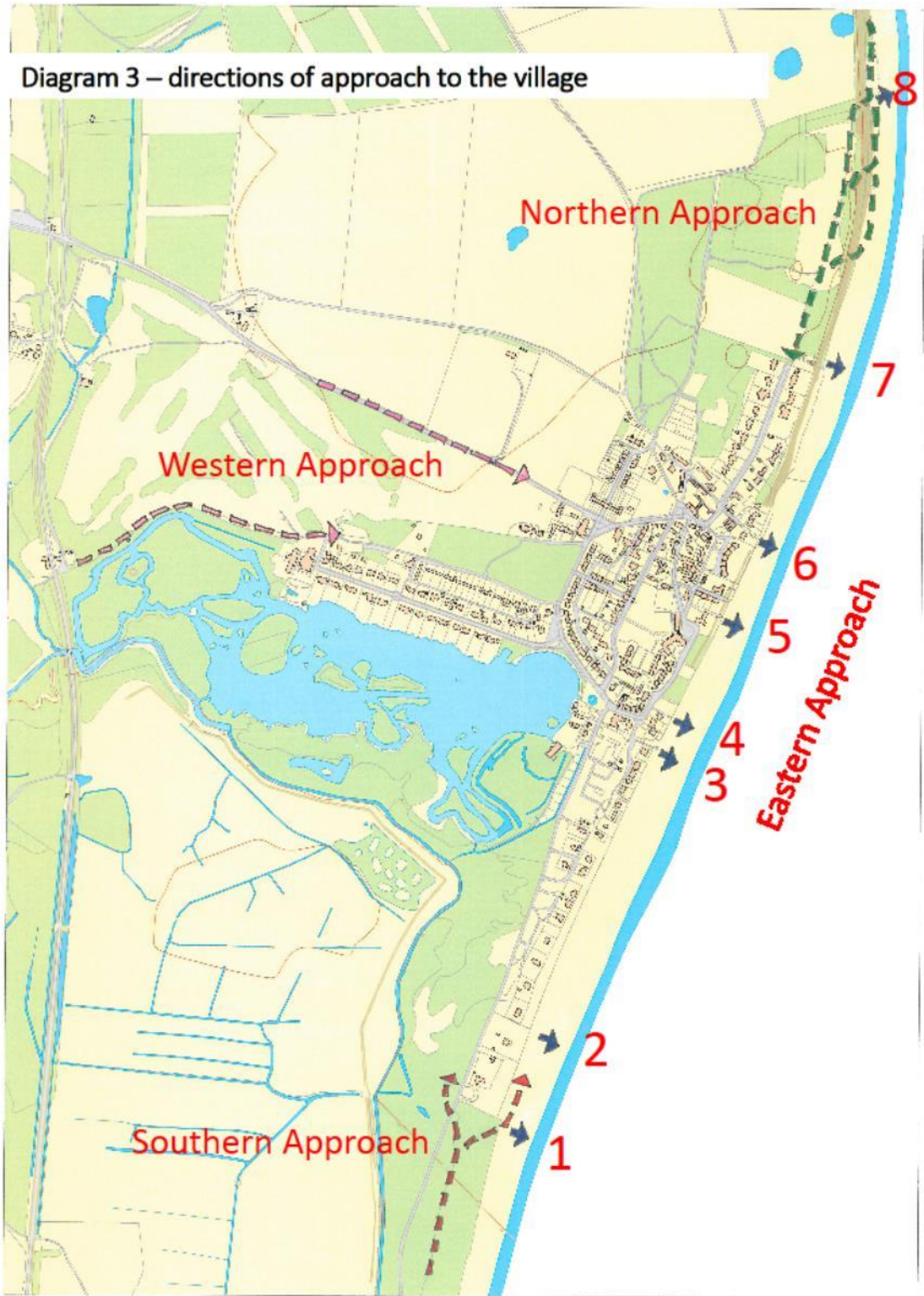
Diagram 1 : extent of long-term sea defences



Diagram 2 - public realm and development initiatives



Diagram 3 – directions of approach to the village



DISABLED RAMBLERS NOTES ON INFRASTRUCTURE

Useful figures Mobility Vehicles

- o **Legal Maximum Width of Category 3 mobility vehicles: 85cm** Same width is needed all the way up to pass through any kind of barrier to allow for handlebars, armrests and other bodywork.
- o **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

Infrastructure

Infrastructure on the route of the England Coast Path should be assessed by Natural England for suitability for those with limited mobility, and particularly for those riding large or all-terrain mobility vehicles. The assumption should always be that these individuals will be alone, and will need to stay sitting on their mobility vehicle, ie they will not be accompanied by someone who could open a gate and hold it open for them. The principle of the least restrictive option should always be applied.

New infrastructure New infrastructure should comply with Bristol Standard with BS 5709: 2018 Gaps, Gates and Stiles.

Existing infrastructure The creation of the England Coast Path provides a perfect opportunity to improve the trail to make it as accessible as possible. Unsuitable existing infrastructure could be removed now and, where necessary, replaced with new, appropriate infrastructure in line with BS 5709: 2018 Gaps, Gates and Stiles.

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-for-2-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 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/york2in-1/> could be an alternative, with a self-closing, two-way opening and yellow handles and EASY LATCH.

Bristol gates

(Step-over metal gate within a larger gate.) These are a barrier to mobility vehicles, as well as to pushchairs, 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-2-in-1/> could be an alternative, with a self-closing, two way opening, and 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. Many 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 recommend the Centrewire Woodstock Large Mobility kissing gate, fitted with a RADAR lock, which can be used by those riding mobility vehicles. NB this is the only type 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
- 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 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 historic reasons, 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 suitable alternative infrastructure. If there are good reasons to retain the stile, such as historic reasons, 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 trail follows a footway (eg 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 trail passes over a kerb, a dropped kerb should be provided.

Disabled Ramblers March 2020