

Coastal Access – Hunstanton to Sutton Bridge length HSB2



Representations with Natural England’s comments

August 2022

Contents

1. Introduction.....	1
2. Background	1
3. Representations and Natural England’s comments on them.....	1
Length Report HSB2	2
4. Supporting documents.....	42

1. Introduction

This document records the representations Natural England has received on the proposals in length reports HSB2 from persons or bodies. It also sets out any Natural England comments on these representations.

2. Background

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

In total, Natural England received 21 representations pertaining to length report HSB2, of which five 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 16 representations made by other individuals or organisations, referred to as ‘other’ representations. Section 4 contains the supporting documents referenced against the representations.

3. Representations and Natural England’s comments on them

Length Report HSB2

Full representations

Representation number:

MCA/HSB2/R/19/HSB0823

Organisation/ person making representation:

COUNTRY LANDOWNERS ASSOCIATION – [REDACTED]

Route section(s) specific to this representation:

HSB-2-S001 to HSB-2-S062

Other reports within stretch to which this representation also relates:

Reports HSB 3 and HSB 4

Representation in full

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

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

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

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

Natural England’s comments

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

The Scheme says;

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

After the route is open discussions about works would take place with the highways authority that maintains the Coast Path (in Norfolk there is already a dedicated National Trails Officer). Where work is required to take place on land subject to coastal access rights, an application can be made to Natural England who will consider temporarily excluding access to the land for

land management reasons. If an extended period of closure is needed, then this is discussed along with reasons for the need for the closure. The highways authority would also consider the need to close any affected rights of way.

In addition, the Scheme says;

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

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

Representation number:

MCA/HSB2/R/16/HSB0839

Organisation/ person making representation:

NATIONAL FARMERS UNION – [REDACTED]

Route section(s) specific to this representation:

Representation says 'The land from Wolferton Creek to Sutton Bridge' (which covers Reports 2, 3 and 4)

HSB-2-S001 to HSB-2-S062

Other reports within stretch to which this representation also relates:

Reports HSB 3 and HSB 4

Representation in full

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

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

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

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

not only provide wide-coverage flood protection against the increasing risk of sea-level rise but will also provide a safer route for users.

Natural England's comments

The points raised here have also been raised by other respondents and so please refer to the response to the first representation above, from the CLA.

Relevant appended documents (see section 6):

A Water Resources East - Initial Water Resources Position Statement

Representation number:

MCA/HSB2/R/16/HSB0839

Organisation/ person making representation:

NATIONAL FARMERS UNION – [REDACTED]

Route section(s) specific to this representation:

Representation says 'The land from Wolferton Creek to Sutton Bridge' (which covers Reports 2, 3 and 4)

HSB-2-S001 to HSB-2-S062

Other reports within stretch to which this representation also relates:

Reports HSB 3 and HSB 4

Representation in full

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

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

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

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

recommend that a similar approach be taken for the seawall that surround the Wash as this will not only provide wide-coverage flood protection against the increasing risk of sea-level rise but will also provide a safer route for users.

Natural England's comments

The points raised here have also been raised by other respondents and so please refer to the response to the first representation above, from the CLA.

Relevant appended documents (see section 6):

A Water Resources East - Initial Water Resources Position Statement

Representation number:

MCA/HSB2/R/17/HSB0673

Organisation/ person making representation:

RSPB

Route section(s) specific to this representation:

The area seaward of the proposed coast path from HSB-2-S001FP to HSB-2-S061 and including the areas of sand, vegetated shingle, dunes and marshes landward of this stretch of coast path.

The RSPB has specific concerns regarding the impact of the current proposals on the habitats and species present seaward and landward of the section between RSPB Snettisham and South Outmarsh (HSB-2-S054 to HSB-2-S061).

Other reports within stretch to which this representation also relates:

Report 1 (in part)

Representation in full

The RSPB submitted a single representation covering several reports rather than one for each report. Their comments on the proposals about North Beach Heacham and ringed plover have been considered by Natural England in our comments on Report 1. This is a lengthy representation, so for ease of reference we have commented directly into the text in **green**.

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

- the lack of ecological and visitor information presented in the documents;
- the failure to identify all necessary infrastructure needed to manage livestock in areas where there is currently no public access;
- the limited management measures proposed to protect waders, wildfowl and specifically breeding ringed plover using this stretch of coast;

- the over reliance on signage to manage any current and future disturbance from users of the coast path;
- the failure to secure viewing screens for sensitive sections of the route between Snettisham pits and South Outmarsh;
- the lack of a formal monitoring programme to confirm assumptions and ensure adequate measures will be in place to manage any disturbance to sensitive species and habitats (reliance on Wetland Bird surveyors and ad hoc surveys will not provide reliable data when the majority of coast path users would be present); and,
- queries over the proposed budget given the identified additional infrastructure and monitoring that will be required to effectively manage and maintain the route and the protected sites and species which this stretch of coast runs adjacent to and through.

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

1. Project proposal

The RSPB recognises that Natural England has a statutory duty (Under the Marine and Coastal Access Act 2009) to improve access around the English Coast. As a result, Natural England has reviewed access around The Wash. A route has been identified to improve existing access routes, and create additional access routes, to connect the Norfolk Coast Path to Sutton Bridge. A range of mitigation measures have been identified that includes signage, way markers and post and rope fences. Additional gates will be erected in key areas to allow pedestrian access in areas where livestock graze. A budget has been established that includes maintenance and Norfolk County Council will be responsible for the upkeep of the route once it is established.

2. The use of Wetland Bird Survey (WeBS) data

The proposed route follows the edge of The Wash Special Protection Area (SPA) and Ramsar site, as well as The Wash & North Norfolk Coast Special Area of Conservation (SAC). These are underpinned by The Wash Site of Special Scientific Interest (SSSI). The RSPB supports the use of Wetland Bird Survey (WeBS) data to supplement the citations, as these data provide a more accurate understanding of the current importance of The Wash for specific features, which have changed considerably since designations were enacted. The RSPB accepts the data presented in the report provides an accurate understanding of the nature conservation importance of the route where data are available. These data will provide a trend over time to allow an understanding of the relative importance, but only for particular stretches of the coast. For some areas, however, where WeBS data alone are relied upon this may not reflect fully the importance of an area (notably the section between Wolferton Sluice and South Outmarsh) and, as they are carried out monthly, they will only provide a snapshot of bird usage. They also will not reflect the importance of functionally linked areas landward of the proposed coast path which will not be covered by WeBS counts. The lack of appropriate monitoring is a serious concern and we discuss this in more detail below (see Sections 5a and 5c).

Natural England Response: The RSPB has usefully provided this summary and Natural England has responded to each point below.

3. Potential impact on ringed plover

The RSPB is particularly concerned for ringed plover that breed along this stretch of coast, which is an iconic species of the Norfolk Coast Area of Outstanding Natural Beauty (AONB) and listed on Appendix II of the Bern Convention as a Species requiring special protection. Between 1984 and 2005, the number of ringed plover breeding in Norfolk declined by 63%, with a national decline of 47% between 1984 and 2007². Subsequent coordinated counts since 2014³ have raised further concerns that the decline has continued. Norfolk currently supports c.2.8% of the UK population of breeding ringed plover and the number of pairs breeding at Snettisham and Heacham make up c.12% of the Norfolk breeding population (see Appendix 1). The numbers breeding along this stretch of coast have declined over time and coincides with increased pressure from visitors to these locations. Liley & Sutherland (2007)⁴ modelled change in ringed plover numbers based on changes in disturbance levels and determined the degree to which disturbance can depress the population. Of significant concern is the current population level is significantly lower than any of the model predictions. This is of serious concern for this well-studied ringed plover population. The proposed coastal access route offers an opportunity to implement appropriate management along this stretch of coast to better manage visitor disturbance, however, the RSPB is concerned that too much onus is being placed on signage alone to address problems. Monitoring proposals are limited and are unlikely to provide any meaningful data (see Section 5a and 5c below). The RSPB therefore considers the **proposals to manage impacts on this species are inadequate as currently set out.**

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

³ Coordinated counts were started as part of a package work initiated through the Little tern EU LIFE+ project and coordinated by Neil Lawton (NE Support Advisor, Scolt Head Island NNR).

⁴ Liley, D & Sutherland, W.J. (2007). *Predicting the population consequences of human disturbance for Ringed Plovers Charadrius hiaticula: a game theory approach*. Ibis 149 (Suppl.1), 82–94

Natural England Response: A response to this point has been made in Natural England's comments on Report 1, being the section of coast where the ringed plover nest.

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

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

It will also be important to understand whether people **will** adhere to the signage being planned to keep people to the coast path route and away from sensitive habitats and species. We recommend strongly that further consideration is given to support wardens on the ground and a detailed three to five-year programme of monitoring be put in place as part of the project (see detailed comments on proposed mitigation measures in Section 5 below). Such monitoring during the early stages of the project would help to determine if the signage is effective, if adjustments are required, and if additional mitigation is necessary.

During 2020, there was a large increase in visitor numbers to sites in North and West Norfolk. This included significant increases in visitors accessing the RSPB Snettisham reserve. These

were often new visitors, many from Dersingham and nearby villages who were exploring the local area for the first time. Once they had found a good walking and cycling route they spread their findings on social media and this meant that the ringed plovers breeding at Snettisham and Heacham faced a significant increase in disturbance. The evidence suggests that now these routes have been found, and especially given the encouragement to explore the area by tourism bodies, it must be expected that the higher levels of users of the coast will continue. The increased number of visitors must be factored into infrastructure requirements, maintenance costs and, most importantly, monitoring requirements to confirm usage and impacts and ensure any adverse effects on integrity will be avoided.

Natural England Response: The RSPB says that no information is given to show existing usage. The HRA however makes several references to existing survey work including the Footprint Ecology report on surveys at 35 locations within protected sites across Norfolk and data from a NE survey using people counter data loggers. The RSPB has shown concern about 2020 increased recreational pressure and will be aware that it is a wider issue around the Norfolk coast. In Norfolk a Green Infrastructure (GI) and Recreation Avoidance Mitigation Strategy (RAMS) is being discussed by the Councils. This GIRAM Strategy is funded by contributions from housing development and identifies a detailed programme of county wide mitigation measures aimed at delivering the necessary mitigation to avoid adverse effects on the integrity of the Habitat Sites. It is not designed to deal with existing recreational impact issues just those of future predicted impacts, though it will take opportunities to address historic issues, with the aim of achieving no net increase in disturbance.

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

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

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

Outputs of the Strategy include;

- *an audit of signage at Habitat Sites (SPA, SAC and Ramsar), including interpretation as well as appropriate access points, and a budget for new interpretation boards*
- *Working with landowners and partners will be crucial for any fencing needed to protect existing breeding sites e.g. for Little Tern & Ringed Plover populations on the coast,*
- *Bird monitoring surveys will need the RAMS team to work closely with landowners and partners to map key roosts and feeding areas;*
- *Monitoring of sensitive habitats, car park counts, visitor surveys and access management assessments.*
- *setting up a dog related project for the county's Habitat Sites.*

The Strategy states;

3.3.3.1 Visitor engagement

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

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

In addition, there are other initiatives considering recreational impact that are being coordinated by The Wash and North Norfolk Marine Partnership (WNNMP), of which RSPB is a member:

'Managing Visitors with Dogs Project' - guidance to conservation site managers on how to manage visitor expectations by influencing/amending websites that are most likely to appear from pre-visit searches. Engagement with dog-related businesses to raise awareness of protected landscapes, whilst encouraging and supporting best practice.

'Operation Seabird' - a national campaign, being led by local police forces to tackle coastal wildlife disturbance through engagement and education, with police offering "boots on the ground" support to local nature sites.

Limits of Acceptable Change Study - a project to carefully monitor and manage increased recreational pressure, to ensure that conservation features within the area are not negatively impacted.

WNNMP and Norfolk Coast Partnership, with PROWAD LINK funding, will be conducting a collaborative study that will enable:

- **acceptable levels of visitor presence to be established** for nature sites - for their future planning and subsequent management.
- **sector-specific recommendations** - provide stakeholders with clear guidance on how best to protect local sites and to reduce pressure on nature 'hotspots' and/or support the promotion/creation of alternative sites
- **engagement with local communities** - to enhance connections with local nature sites and encourage best practice
- **engagement with local businesses** - to develop nature-based products/experiences.

These examples show that although the RSPB rightly has concerns over the recreational impact across the whole area it isn't a concern that is being ignored, but it is being carefully assessed through several projects.

5. Comments on the Habitats Regulations Assessment

a) Approach to monitoring

The RSPB is not convinced by the reliance on WeBS counters and ad hoc surveys to monitor the compliance of visitors to the coast path. We have particular concerns about the monitoring proposed for the section between RSPB Snettisham and South Outmarsh (HSB-2-S054 to HSB-2-S061).

WeBS counters have been asked to monitor compliance (or not) with regard to whether coast path users stay off the seawall adjacent to the saltmarsh, and therefore reduce any potential disturbance to birds on the saltmarsh. They have not been asked to monitor any other sections of the path or wider areas that are not being counted as part of the WeBS sectors. These surveys will also not be carried out when the majority of visitors will be using the coast path. This means that any data collected will be limited in understanding whether coast path users are creating disturbance to sensitive species and habitats. This is particularly important for sections where no current public access is permitted, notably the section between Wolferton Sluice and South Outmarsh (HSB Report 2, Maps HSB 2c-2g, pp.16-20). The WeBS data present a snapshot of bird numbers and demonstrates that this is an important area. However,

no formal monitoring programme has been identified to better understand the importance of the area and assess disturbance levels created by opening this up to public access. This is especially important where it would, for example, allow dogs to access this area (many of which are likely to be off leads based on Panter & Liley (2016)).

Natural England Response: The WeBS (wetland bird survey) counts are done by a number of volunteers, including the RSPB's North Norfolk Reserves Manager and the NE Senior Reserve Manager for North Norfolk National Nature Reserves. Natural England accepts that these ECP people counts, by the WeBS recorders, along with other daytime visits by the RSPB Manager are informal but they are part of the first level of data collection, along with people counters, anecdotal evidence from landowners and co-ordination with GIRAMS. As the RSPB note, this measure is in response to the specific concerns regarding this section of the route – such an approach is not applied more generally (and it would clearly not be realistic to ask WeBS counters to monitor areas beyond their survey sectors). Similarly, the timing of these surveys is set by WeBS, with this section expected to have low ECP usage due to the long distances involved (whilst visitor numbers may increase somewhat in summer there would be less bird concern than during the breeding season or later, with larger autumn roosts). Some long-distance walkers (not just out over summer) may well be walking the route at the same time as WeBS surveys are in progress.

The HRA, on pages 71 and 72 gives details of possible future responses '*Given the length of path at the foot of the seawall it would be appropriate to monitor the response of visitors in the early years of the path to quantify non-compliance and its effect and whether additional mitigation is required*' and '*A review of the monitoring to be carried out after 2 years of the opening of the path to decide whether additional mitigation is required and whether the monitoring should continue*'. If issues are identified then this may trigger a range of responses including further monitoring, changes to infrastructure, restrictions and ultimately a change to the route.

In addition, Natural England proposes monitoring of the vegetated shingle habitat within the RSPB reserve (HRA pages 9, 65, 81 and 82) using survey methods to decide whether further infrastructure is needed. An initial survey of the shingle has already been completed to provide a baseline against which to measure possible future change

The RSPB is concerned about walkers going on the bank rather than using the route on the landward side. In response to an objection about the published route where cattle graze (section HSB-2-S061) Natural England has proposed a modification to the route. If accepted it would mean that the ECP is on the edge of an arable field, taking walkers off the inland edge of the bank and so reducing the likelihood of walking on the bank.

Experience of the area has also found that trespass onto the top of the seawall would be possible to use as a vantage point, particularly for raptors. Over the years we've had white-tailed eagle, pallid harrier and black-eared kite viewable over the farmland and saltmarsh south of the Snettisham pits. The birds could all be viewed from the south end of the pits, or on the seawall by the Wolferton pumping station, but with the establishment of the coast path, trespass onto the seawall could take place anywhere along its route. Official viewing points on top of the seawall may help to prevent this (see section 5c below).

Natural England Response: People with an interest in the raptors mentioned by the RSPB are by definition people with a specific interest in birdwatching, who have been made aware of the appearance of unusual species and are normally infrequent visitors. While Natural England recognises that some birdwatchers may cause disturbance, NE hopes that many/most are

aware of their potential impact and would take note of signage to this effect. NE aims to manage access in the area through signage and existing fencing, following the principle of least restrictive option but if this is not successful then will review the situation and consider the need for restrictions.

As stated above a modification to the alignment is being proposed away from the base of the bank which would mean a reduced likelihood of being on the bank in section HSB-2-S061.

This is an area of acknowledged uncertainty and is a significant failing of the current proposal and HRA conclusions that more is not being done to investigate this issue. Data loggers are not even proposed as an initial way to start gathering data, yet they were deployed on the Peter Scott Way. **There is an urgent need to review the monitoring proposed for this section** and the whole of the coast path to ensure future use will be appropriately managed and greater certainty that adverse effects on integrity will be avoided. This will also determine whether the proposed budget being made available to install and maintain the path is appropriate.

Natural England Response: The RSPB says that '*Data loggers are not even proposed as an initial way to start gathering data, yet they were deployed on the Peter Scott Way.*' Natural England refers to the HRA (pages 9, 65 and 81) where NE proposes a people counter (data logger) at Snettisham RSPB reserve '*to monitor the usage of this sensitive area and provide evidence should further infrastructure be necessary (e.g. a boardwalk)*'. NE proposes another counter on the sea bank between RSPB Snettisham and South Outmarsh to monitor compliance with walking the correct route (page 72). All work needed to prepare the route for opening is fully funded by Natural England and ongoing maintenance is funded by a formula agreed with all National Trails.

b) Certainty of the effectiveness of signage and the voluntary acceptance of messages to avoid sensitive areas

The HRA acknowledges that increases in visitor numbers could result from the coastal access route:

"Based on this we predict only small increases in use above current baseline levels except on the stretch from Wolferton pumping station to King's Lynn where there is currently no access." (Section D3.1, p.49)

It is of concern that the "small" increases have not been quantified and a lack of consideration has been made of the effect of existing pressures. For example, significant declines in ringed plover have occurred, as reflected in the national survey in 2007 and subsequent coordinated counts since 2014 (see Appendix 1). Any increase in walkers, especially those with dogs, will exacerbate the situation. This concern is referenced only a few paragraphs beforehand:

"Dog control will be a key theme: there is a body of evidence that suggests that disturbance to waterbirds is more significant when dogs are allowed to roam freely [Jenkinson, 2016]. On The Wash a high proportion of dogs have been recorded off lead [Panter & Liley, 2016]." (Section D3.1, p.48)

Worryingly, there is a high degree of trust put in visitors immediately reading signage and altering their behaviours:

*"We expect most **new** users to adopt the required patterns of behaviour from the outset, either because they remain on the England Coast Path or because they read the signs and consciously adopt the desired behaviour. In the long-term we expect a reduction in disturbance to waterbirds as existing users moderate their behaviour in response to the information we give them."* (Section D3.1, p.49 – emphasis added)

Section 4 above highlights the RSPB's experience of visitors using this stretch of coast, including an up-date on the 2020 season. The experience from 2020 must be considered in

assessing likely use of this stretch of coast, the effectiveness of current measures that include signage and the willingness of new and existing visitors to follow messages without having a warden presence to reinforce messaging. It is understood that signage when delivered in the right way has a role to play in managing the coast, but this needs to be reinforced by other means. The only means to **effectively** influence behaviour has been to establish volunteer wardens to ensure daily coverage of the reserve to engage with visitors to achieve a change in behaviours. This was clearly demonstrated at RSPB Snettisham during 2020 where many visitors were new visitors, did not appreciate the area supported sensitive species and habitats and appeared to pay little if any notice of any signage that was erected. Given no warden presence is recommended or budgeted for and any monitoring of visitor numbers and the significant impacts on beach nesting birds such as ringed plover already occurring on this stretch of coast, this highlights a current gap in the proposal for the coast path and is an area that requires urgent review.

Natural England Response: The RSPB refers to visitor numbers and in the HRA sections D3.2D and D3.2E Natural England discusses possible numbers by using a comparison to the Peter Scott Walk, a similarly remote route but being an already-promoted route on a public footpath. The 2020 season has attracted a new audience to countryside visits who may not be familiar with appropriate behaviour. New signage will introduce information on why the area is special and how to visit responsibly. In the 2015 Panter and Liley survey mentioned above 69% of local people and 72% of holidaymakers do not know about the sensitivities of the Wash, with two survey points being at Snettisham.

The RSPB refers to the current and historic impacts of visitor numbers on ringed plover. NE has responded to this point in Report 1. Their response to the potential for disturbance, on an already very popular beach was to propose the route on an inland public footpath.

The RSPB is concerned about the effectiveness of signage and NE will consider if there are any lessons to be learnt from the RSPB and NE co-branded signs at Winterton Dunes National Nature Reserve and Great Yarmouth South Denes advising on little terns.

The RSPB has requested eleven signs including those shown on Map 2b (shown below) that have already been identified in the HRA e.g. page 9 and NE will discuss these locations with the landowner. Elsewhere in the HRA NE says that '*Information boards will be installed at appropriate points along the walk to inform visitors of the biodiversity interest of The Wash and the sensitivity of habitats and species to disturbance*' and NE welcomes RSPB's suggestion of locations. NE notes in the conclusion below that the RSPB considers communication between interested parties '*is essential to ensure an appropriate level of signage is erected and to ensure that there is continuity in messaging*'.

The ECP is not able to propose a system of wardening but will work with the Norfolk GIRAM Strategy.

c) Failure to secure an option for viewing screens to provide views of The Wash in sensitive areas whilst minimising potential disturbance

The HRA states that alongside signage to highlight the importance of The Wash and appropriate behaviours to avoid impacting sensitive species and habitats, "...*additional physical measures such as guide fencing, which act as a visual clue to encourage people to stick to the way-marked route, or fences/screens which make it much more difficult for people or dogs to leave it*" (Section D3.1, p.49). We note that viewing platforms are costed within the budget in Report HSB2 (Section 2.2.22, p.6). However, the HRA states that:

“In planning this section the inclusion of two viewpoints had been considered to enhance the experience for visitors which would also lessen the residual risk of people accessing the top of the seawall. Unfortunately, to date it has not been possible to progress this with the EA.”
(Section D3.2D.III, p.71)

This is particularly worrying given the limitations of the proposed monitoring, which is relying on WeBS counters and ad hoc surveys. As highlighted in section 5a above, peak times when the path will be used will not be monitored. There can therefore be no confidence placed in the proposed monitoring and that appropriate measures will be in place to avoid disturbance of SPA and SSSI features, as a result of opening this area up to public access.

The lack of infrastructure to manage path users on this section and the lack of adequate monitoring raises serious questions about the confidence that can be placed in a conclusion of no adverse effects on integrity. This is also a concern given the reliance on WeBS data to understand the importance of this section of the path (see section 2 above). No additional bird data appears to have been collected to inform decisions. This is particularly important for the area landward of The Wash which is not captured within the WeBS surveys. The RSPB consider it is essential that the monitoring gaps are addressed and that the viewing screens must be secured before this section of the coast path can be approved.

Natural England Response: As stated in their response to RSPB's point 5a above Natural England says the RSPB has under-recognised the level of monitoring both on the RSPB reserve and in other areas. The RSPB notes the intention to create viewing points in the HRA. The intention remains but constraints created by not compromising the flood-defence function of the wall and the need to maintain access for the landowner meant that at the time of writing the HRA and publishing the proposals a design had not been agreed. NE will continue discussions with the Environment Agency.

d) Incomplete in-combination assessment, specifically tourism strategies

Having reviewed the in-combination assessment, it would appear that there are a number of gaps in the plans and projects that the coast path has been considered against to understand the full impact of the proposed route. We set out in Table 1 below plans we have identified that must be considered in the HRA to ensure the full impact of the proposed coast path has been adequately assessed. This is vital to ensure that the appropriate types and scale of mitigation measures have been identified to demonstrate that adverse effects on integrity will be avoided.

Table 1: Plans or projects not identified, or that do not appear to have been considered fully, in the HRA in-combination assessment and which should be reviewed to demonstrate that adverse effects on integrity will be avoided.

Plan or project	Reason for including in the in-combination assessment
West Norfolk Destination Management Plan 2016-2020	<p>This document has been referenced in the HRA but does not appear in the in-combination assessment. This is essential given the focus of this plan is:</p> <p><i>“...the northern coastline from Snettisham round to Holkham provides an outstanding coastline with many fine beaches. The resort of Hunstanton and neighbouring Old Hunstanton is a well-established resort although it needs to develop and diversify its product to attract wider audiences beyond its role as a family summer resort and to attract more visits and spending from people visiting other neighbouring parts of West Norfolk.”</i></p> <p>The text on ‘Walking’ is particularly pertinent (emphasis added):</p> <p><i>“Walking tourist activity can be divided into 3 categories; centre based walking, short walks up to 2 miles and longer walks/rambling. More people identify going for a long hike or ramble as part of a day visit than either short walks or centre based walks. The GB Day Visits Survey (4) clearly demonstrates the significance of this market, with more people estimated to make a day trip for a long walk than visiting heritage attractions.</i></p> <p><i>West Norfolk benefits from offering walking trails, including the Norfolk Coast Path and Peddars Way National trails plus regional trails The Nar Valley Way, Fen Rivers Way and Peter Scott Walk.</i></p>

	<p><i>As part of the English Coast path project, current plans to extend the Norfolk Coast Path to King's Lynn, provide a very significant opportunity to promote King's Lynn and Hunstanton as gateways to Norfolk Coast Path. Work with businesses within the footpath corridor is important to enhance the product presented to visitors as well as continued and wide promotion of the walking product."</i></p>
Connecting Norfolk - the county transport plan to 2026, as well as the emerging new Transport Plan for Norfolk.	Connecting Norfolk is the county transport plan to 2026, but identifies developing access to improve sustainable tourism opportunities. This has not been considered in the assessment. https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/roads-and-travel-policies/local-transport-plan .
New Anglia Local Enterprise Partnership (LEP) work on tourism and measures to develop Tourism.	<p>Consideration has been made of the Greater Lincolnshire Local Enterprise Partnership's Economic Strategy, thus making the case for also considering other relevant LEPs.</p> <p>There are aspirations for 5% growth in visitor numbers. This needs to be considered in the assessment, as the coastal footpath will be an opportunity to encourage new visitors to West Norfolk, as highlighted by the Destination Marketing Plan.</p>
Greater Cambridgeshire and Peterborough LEP work on tourism and measures to develop Tourism.	<p>Consideration has been made of the Greater Lincolnshire Local Enterprise Partnership's Economic Strategy, thus making the case for also considering other relevant LEPs.</p> <p>As the attraction of the area extends to these areas and has been recognised in the WNDMP.</p>
Norfolk Green Infrastructure Strategy	These strategies are emerging but highly relevant to the Coast Path. It needs to be clarified how the coast path proposals relate to these strategies to understand mitigation requirements and ensure appropriate governance.
Norfolk Recreation Avoidance and Mitigation Strategy (RAMS)	

Visit Norfolk and other associated forums	Visit Norfolk and other sites are actively promoting the Norfolk coast as a good place to visit. Whilst mention is made of the sensitive areas, increases in visitor numbers have already caused disturbance to species with the result that, for example, ringed plovers face significant challenges at Heacham despite the historic importance of this site. The work being done to promote visits must be considered in the in-combination assessment.
Planning applications seeking extension to holiday parks opening	There have been a large number of applications submitted to King's Lynn & West Norfolk Borough Council for the extended opening of holiday parks to offset the impact of Covid through 2020. Whilst the reasons for this are fully understood, it is essential that all proposals that could result in increased visitor numbers be carefully assessed to ensure appropriate measures will be in place to protect sensitive species and sites. If this was a permanent change this could result in more visitors during the winter period who could make use of the coast path. This needs to be considered in the HRA.

The RSPB recommends that the in-combination assessment be revisited to ensure **all** plans and projects related to developing tourism in west Norfolk is included to ensure the evidence base used to inform the HRA is as robust as possible and will reflect fully the increasing visitor numbers and tourism aspirations for west Norfolk.

Natural England Response: The HRA for this ECP stretch considered more than 20 projects and plans. It is unfortunate that some plans were omitted in error and Natural England thanks RSPB for bringing them to their attention. As NE have been aware of these projects and some are referred to elsewhere in the HRA (e.g. GIRAMS), NE can confirm that consideration of these other plans does not alter the conclusions of the HRA. As the ECP is referred to by some of these projects (e.g. the WNDMP) there is an element of built-in circularity here, plus strong links between most of the projects mentioned. Tourism will remain an important part of the Norfolk coastal economy, but much of this Coast Path route will only be attractive to long-distance walkers, given the distances between parking facilities or bus stops.

On the final point, regarding possible extended Holiday Park opening in response to covid, it is impossible to know how long such changes may last for. Should this lead to significant permanent changes at specific locations, these would be assessed in the future as part of the normal ECP review process.

6. Additional comments on the proposed route

a) Greater detail is needed on the route maps to identify designated sites and where proposed new infrastructure will be erected

The maps of the entire proposed coast path route do not provide a clear indication of the protected sites which the coast path will run adjacent to. This would help identify the relationship between the coast path and sensitive locations. We recommend that protected sites be added to the maps.

The RSPB's Snettisham reserve will have the coast path running through it, but the reserve boundary is not marked on the map. We request that the boundary of the reserve be added to make it clear to anyone looking at the route that there will be specific requirements for anyone accessing this section of the coast path to ensure that sensitive species and habitats that we manage will not be adversely affected.

Whilst the HRA provides some indication of where signs, interpretation panels and fencing will be erected, this is not included on the maps. It would be helpful if this information was provided to understand at a glance what is being proposed and understand the implications for areas we manage or where we know sensitive features are present.

The maps in the HRA indicate where signage and interpretation panels are being proposed along the coast path. However, they are not indicated on the maps contained within the reports on each section. It would be helpful to have maps that have all this detail in one place to enable an easy review of the proposals to determine if the proposals are appropriate.

Natural England Response: The RSPB has made suggestions about improvements to maps that were produced for the Natural England proposal process and suggests that protected sites be added to the maps. NE says that maps showing the international and national designations, along with the route are shown in the HSB stretch Overview on Maps C1 and C2.

Those maps however were only produced for the Reports and Overview as part of the Proposals phase and do not have any future purpose (once the route is open) so there is no value in making changes to them.

The RSPB has requested that *'the boundary of the reserve be added to make it clear to anyone looking at the route that there will be specific requirements for anyone accessing this section of the coast path to ensure that sensitive species and habitats that we manage will not be*

adversely affected.' As above, the maps have no future purpose, however when a route is approved it is added to Ordnance Survey maps but only OS controls the information that goes on their maps and currently the specific boundaries of RSPB reserves are not shown on OS 1:25000 maps. Natural England believes that adding a boundary line would have limited value because it would not give any further details of the 'specific requirements' mentioned by RSPB.

Instead NE is proposing to install site information boards which will help with the lack of knowledge. The HRA noted on page 71 '*Surveys of visitors to The Wash at Snettisham and Sutton Bridge*' (Panter, Liley & Lowen, 2016 and Panter & Liley, 2016] show that many visitors are either unaware or unsure of the nature conservation importance of The Wash and the sensitivity of wildlife to disturbance (see D2 above).' As mentioned above, around 70% of people do not know about the sensitivities of the area.

At time of drafting the HRA there were no information boards at the RSPB reserve on the public footpath from the north and so the ECP proposals will improve the situation of information provision. Currently, there is no access from the south (King's Lynn) to Snettisham RSPB reserve and so there is no RSPB signage at that future access point. In Appendix 2 the RSPB has suggested (on Map 2b) that signage is needed at the southern end of the reserve to highlight vegetated shingle. This has already been highlighted and agreed in the HRA.

NE notes that the HRA (pages 9, 63, 64, 67, 71 and 82) proposes new interpretation boards to be installed within the RSPB reserve and relating to the sections where access is not on the sea wall. The exact locations have not been decided with the RSPB and so were not included on the maps.

The HRA page 62 gives more detail:

These information boards should:

- *Include a map of the site*
- *Highlight the significance of the site nationally / internationally*
- *Explain the sensitivities on site (birds, other species, saltmarsh and vegetated shingle)*
- *Highlight that the saltmarsh and flats are unsuitable for access*
- *Highlight where the England Coast Path and other paths are*
- *Request visitors to keep to paths and keep dogs on leads.*

NE believes that information boards on site will have more value than a boundary on a map that walkers may not be using.

NE will work with the RSPB to create a joint message for walkers going through the reserve.

b) Proposed fencing at Snettisham on Common Land

The RSPB is supportive of the proposed fenced areas at Snettisham. The detail on the proposed post and rope fences is helpful and provides a clear indication of the design against which impacts can be assessed. However, the RSPB recognises that there are Common Rights on the area where Natural England are advising the fences are erected to protect shingle habitat. Clarity is required on the process needed to work through this issue and the role of the landowner. The RSPB would expect Natural England to take the lead on consultation or the legal process involving the placement of structures on the Common and not place this responsibility onto the Landowner.

Natural England Response: Prior to receiving this representation from RSPB on these ECP proposals NE had clarified this position with the RSPB's Rural Surveyor. The process will not be

led by RSPB or Natural England but will be done as part of the implementation work by Norfolk County Council.

c) Revision needed of the proposed gates that will be required between Wolferton Sluice and South Outmarsh

Having reviewed the maps, we have identified some inaccuracies in the proposed infrastructure that would be required to enable public access along the Wolferton Creek to South Outmarsh section of the coast path. On map 2c there is an area where water troughs are positioned for cattle that graze this section. In order to allow grazing to continue and pedestrian access along the proposed route additional gates will be required that have not been identified. We have marked the location for these gates in Appendix 2.

Map 2d has a pedestrian gate identified as needing to be erected on this stretch of the coast path. However, we consider a kissing gate would be most appropriate at this location (see Appendix 2). We are happy to discuss and review options.

Natural England Response: Natural England welcomes the RSPB's observation on gates – the requirement for a gate on map 2c had been recorded but had been omitted in error from the proposal maps. Should the Secretary of State approve the proposals Natural England would be happy to provide the required gates. Prior to the implementation phase Norfolk County Council will survey the route and have discussions with landowners and managers about the specific infrastructure.

d) Confirmation that liabilities for the coast path and its upkeep do not sit with the landowner

The RSPB understands that as the Coast Path will form part of the National Trails its management and maintenance will fall to the Highways Authority, in this instance Norfolk County Council, to undertake this activity. As a consequence, liabilities for the implementation and maintenance of the coast path fall to Norfolk County Council. The RSPB expects this to be confirmed should the coast path be approved.

Natural England Response: Natural England can confirm that the management and maintenance of the ECP will be undertaken by Norfolk County Council, along with the liabilities for the implementation and maintenance. For the landowner there is a low level of occupiers' liability, detailed at 4.2.2 of the Scheme:

7. Conclusions

Having reviewed the proposal documents the RSPB does not object to the principle of the proposed route. However, the RSPB considers insufficient information has been provided to demonstrate that appropriate mitigation and management measures will be implemented to ensure that sensitive species and habitats will not be adversely affected by increased recreational pressure. The RSPB is particularly concerned by the lack of resource that will be provided to monitor effectively this section of the coast path. We have identified errors in the proposed infrastructure that will be put in place and we do not consider enough resource has been provided to ensure adequate monitoring and engagement with coast path users will be in place to mitigate impacts of coast path users on the protected species and habitats of this stretch of coast. This is of specific concern between Shepherd's Port and South Outmarsh, as well as the beach area between north beach (Heacham) and Snettisham beach.

The RSPB has been working on coastal access issues relating to beach nesting birds for many years and we would be happy to help develop signage and interpretation materials. We are currently undertaking a project focussing on ringed plovers and other beach nesting birds between Heacham and Snettisham through 2021 and consider it important to maintain

communication to ensure that plans for the coast path and the work that we and others, such as the Norfolk Coast Partnership and The Wash & North Norfolk Coast Marine Partnership, are fully coordinated. We consider this essential to ensure an appropriate level of signage is erected and to ensure that there is continuity in messaging.

If additional information is provided to support the proposal, we will review our position.

Natural England Response: The HRA has proposed monitoring by expanding existing systems as well as new processes with people counters (data loggers) and the opportunity for future review.

Natural England welcomes the ringed plover project which is referred to in the response to Report 1. This is part of a Species Recovery Project that is jointly funded by NE, RSPB, and Footprint Ecology. This will help address the existing pressures on breeding birds that are beyond the scope of the ECP.

The RSPB has concerns over impacts around South Outmarsh. NE has considered an objection where the proposed route would put walkers together with cattle near the bank and is proposing a modification to the route which would mean a reduced possibility that walkers would be on top of the bank in section HSB-2-S061.

With respect to the Coast Path, the route will benefit by being managed to National Trail quality standards, that include regular monitoring of trail condition and associated signage or other new infrastructure. Should wider circumstances affecting the site change at any time in the future, Coast Path management can be adapted as necessary to avoid or reduce any possible negative impacts on sensitive sites. A key feature of ongoing National Trail management is to work closely with relevant landowners and managers to identify and resolve any issues that might arise at an early stage.

Relevant appended documents (see section 4):

Appendix: plover numbers (not included as the NE response is made within Report 1)

Appendix B: Comments on Maps 2b, 2c and 2d indicating where the RSPB considers additional or alternative infrastructure is required to manage footpath users and livestock.

Representation number:

MCA/HSB2/R/6/HSB0824

Organisation/ person making representation:

RAMBLERS ASSOCIATION

Route section(s) specific to this representation:

HSB-2-S001 to HSB-2-S062

Other reports within stretch to which this representation also relates:

N/A

Representation in full

HSB-2-S001 to HSB-2-S052: We support Natural England's proposed route.

HSB-2-S053 to HSB-2-S061: We accept that the route cannot be seaward of the sea wall, nor on top of it. However, given the length of this section, we believe that it will be essential to install information boards to explain why this is so, and provide ways in which people can look over the bank from time to time. It will also be necessary to ensure people are made aware of the absence of places to leave the path until the further end has been reached.

HSB -2-S062: We support Natural England's proposed route.

Natural England's comments

Natural England welcomes the support of the Ramblers Association for the proposed route. NE thanks them for their comments on information boards to explain the location of the route. NE has recognised the importance of this within the HRA so that information boards will inform visitors of the biodiversity interest of The Wash and the sensitivity of habitats and species to disturbance and so help visitors understand why a route on top of the bank has not been possible in all places.

The HRA says (page 71) '*In planning this section the inclusion of two viewpoints had been considered to enhance the experience for visitors which would also lessen the residual risk of people accessing the top of the seawall.*' NE will actively consider how to provide locations for people to look over the bank, but constraints created by not compromising the flood-defence function of the wall and the need to maintain access for the landowner meant that at the time of writing the HRA and publishing the proposals a design had not been agreed. NE will continue discussions with the Environment Agency.

Other representations

Representation ID

Organisation/ person making representation:

MCA/HSB2/R/11/HSB0844

[REDACTED]

MCA/HSB2/R/10/HSB0373

[REDACTED]

MCA/HSB2/R/14/HSB0842

[REDACTED]

MCA/HSB2/R/13/HSB0843

[REDACTED]

MCA/HSB2/R/3/HSB0096

[REDACTED]

Name of site:

Snettisham Beach

Report map reference:

Map 2a

Route sections on or adjacent to the land:

HSB-2-S001 to HSB-2-S047

Other reports within stretch to which this representation also relates

N/A

Summary of points:

Residents who submitted representations are concerned about the proposed route of the ECP. Several issues have been raised that all relate to the proposal to have the ECP on an existing public footpath which is on a concrete-surfaced sea bank. Seaward of the bank is a beach. Landward are a range of chalet-style buildings and caravans, mainly used as holiday accommodation by their owners (some of whom also own the bank).

Privacy

Concerns about increased use of the path given the publicity and promotion of it.

Privacy has been affected by the existing PRoW; one respondent does not feel comfortable in her sitting room anymore. An increase in footfall has made things worse when people walk past and gaze in. The eye contact is disturbing.

Properties are not fenced due to a covenant in the title deeds. Footpath users use the gaps between the houses to get to the inland access road, infringing on privacy.

The footpath is on privately owned land, and the access road is also a private road. Therefore, designated access points need to be clearly stated, in information to users as well as private areas. Good signs may help but, in the past, they have been ripped out.

Access points from North to South given as:

1 from Heacham

2 from car park at HSB-2-S001FP

3 from RSPB car park behind Shepherd's Port Caravan Site and associated paths at HSB-2-S009FP, HSB-2-S048FP, HSB-2-S049/50FP

If the ECP is approved, the public should be made aware that inland land and the road is private. People already using this land are damaging the sea defences.

Users must be made aware of the boundary of the footpath.

Request that public information (printed or online and social media) carries a clear message to address the points raised in these representations. If correct information can be given at the start, then a clear understanding will be established so at least the majority of owners and walkers have a mutual respect for each other.

Suggestions for amendments to the proposed route

Respondents made two route suggestions:

1. the width of the ECP should be defined a 1.5m from the westside of the bank top (the side nearest the sea). This should be accompanied by a reminder that the bank is sited on the respondent's property/land.
2. instead use 'the RSPB path' that goes inland from HSB-2-S048. It then goes north on the landward side of the lagoon then landward of the Shepherds' Port caravan site, near the RSPB car park. This would be better for residents and would also reduce erosion of sea defences (see points below and Supporting Document C)

Other uses of the footpath

The existing footpath is a linear route allowing access from A to B (HSB-2-S011FP to HSB-2-S047FP) and should not be used for recreational purposes e.g. bird watching, resting, picnics, refreshment etc.

Existing misuse of public footpath

Cycling and other vehicles

Increasing number of cyclists use the footpath, many at high speed and oblivious to walkers and other users. Motor vehicles and quad bikes also use the footpath. Near misses with children of property owners. The County Councillor with responsibility for the environment has confirmed that cycling will not be allowed on ECP.

Dogs

Dogs – some owners are responsible, but many dogs are let off their leads causing nuisance and leaving mess (or discarded poo bags).

Leaving the route

People leave the public footpath to join the private road at the rear (easier walking). In the worst cases the spaces between the houses are used as toilets as there are none between Heacham and King's Lynn.

Crossing between the bank and road means they are damaging the sea defence. If owners block the short cuts with branches etc they are removed. In 2013 the sea broke through the weakened points and caused thousands of pounds of damage and there is a concern it will happen again.

Natural England's comment

The proposed route for sections HSB-2-S011 to S047 is on a hard-surfaced protective sea bank. The top of the bank, where Natural England has proposed the route should be aligned, was confirmed as a public footpath (Snettisham FP35) in 2014 after a public inquiry.

At the landward base of the bank is a row of domestic properties that are mainly used as second homes.

This public footpath is described within the Definitive Map Statement (July 2014) (link to [Definitive Statements - Norfolk County Council](#) (King's Lynn) as having a width of 4 metres.



Privacy

This bank has been used for access for many years, as confirmed by the creation of the public footpath. The area has a sandy beach, large car park, over 400 caravans as well as the permanent homes and is close to Heacham and Hunstanton. These factors mean that the route is already well-used and so NE does not think that the ECP will create a significant change to the current levels of access and hence no significant change to the current privacy situation.

A suggestion was made to reduce the width of the ECP to keep walkers to the seaward side of the top of the bank to protect the privacy of residents. However, Natural England does not have any power to restrict access in this way as the top of the bank will not be subject to new coastal access rights because it is excepted land by virtue of its existing status as a public footpath. The public right of way has a definitive width of 4 metres and so the top of the bank is already accessible to the public.

Suggestion was also made to have the ECP 'on the RSPB route' and is shown in a supporting document. Such a route is up to around 500m inland of the proposed route and so does not fulfil the core ECP criteria of being close to the sea, having views of the sea or being reasonably direct.

Comment is made that the route passes over private land however this is no different to the general situation of land ownership with a public right of way on it.

Natural England has however used the discretion afforded under 55D(2) of the 1949 Act to clarify the extent of people's rights to the landward slope of the bank nearest to the properties. Certain coastal land types are included automatically in the coastal margin where they fall landward of the trail if they touch it at some point. 'Bank' is one of these land types, so its landward slope would fall into the coastal margin by default, giving people a right of access to it. When NE assessed the route, it was found that the landward slope of the bank had various uses including garden, steps, decking and in places it was infilled to create a flat area. NE considered that these various features did not provide a particularly clear boundary for walkers and that the landward edge of the interlocking concrete blocks that make up the surface of the

public footpath provide a much clearer and recognisable boundary. NE therefore used the discretionary power under section S55D of the National Parks and Access to the Countryside 1949 Act, to propose that the landward boundary of the coastal margin should be the 'landward edge of the path'. This means that if the proposals are approved by the Secretary of State no coastal access rights would be created on the landward slope of the bank that is closest to the properties.

The proposed line of the trail follows an existing public footpath which is popular and already well used. If approved by the Secretary of State, Natural England would work with Norfolk County Council to establish the ECP along this route, ensuring that it is clearly signed and waymarked in order to steer walkers past areas where there is no right of access e.g. between the houses.

Natural England's duty under the legislation is confined to the trail and associated coastal margin. NE is not required to sign access points onto the trail.

Landowners can if they wish erect signage clarifying people's access rights in relation to their land, taking their own legal advice on this as necessary.

Other uses and misuse of the footpath and area

Natural England's response above clarifies that proposed route sections HSB-2-S011 to S047 are aligned along an existing public footpath and coastal access rights would not apply here.

The Ramblers Association says [Rights of way law - Ramblers](#) '*Your legal right is to "pass and repass along the way". You may stop to rest or admire the view, or to consume refreshments, providing you stay on the path and do not cause an obstruction. You can also take with you a "natural accompaniment" which includes a pram, or pushchair.*' Some activities therefore mentioned by [REDACTED] and [REDACTED] are permissible through the footpath designation and might also be enjoyed by property owners.

If any landowners find that significant nuisance is being caused by people (or dogs) using the path in a way which is not permissible under the legislation, they should bring it to the attention of Norfolk County Council, who maintains the public footpath and will also be taking on the ongoing management of the coast path.

The proposed ECP route does not bring any change to the current access rights already existing along sections HSB-2-S011 to S047.

The bank is maintained by the Environment Agency as a flood-defence structure in the knowledge that it is a well-used public right of way. The Agency did not make any representations about the ECP being proposed on the public footpath and any likely erosion effect.

Relevant appended documents (see Section 4):

C: Inland route suggestion

Representation ID:

MCA/HSB Stretch/R/1/HSB0834

Organisation/ person making representation:
BRITISH HORSE SOCIETY

Name of site:

Whole report

Report map reference:

Maps HSB 2a to HSB 2g

Map HSB E2: Directions to exclude/restrict access – as proposed for area covered by Report HSB2

Route sections on or adjacent to the land:

HSB-2-S001 to HSB-2-S062

Other reports within stretch to which this representation also relates

Reports 1,3 and 4

Summary of representation:

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

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

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

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

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

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

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

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

a. Recognition of equestrians as vulnerable road users

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

b. Inclusion of equestrians in the Norfolk Local Transport Plan

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

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

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

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

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

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

e. Reference to Norfolk's Access Improvement Plan

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

Equestrianism is a popular activity in this part of Norfolk, and one which contributes significantly to the local economy. The equestrian community in Norfolk currently has many difficulties in finding safe access within the area, as identified in Norfolk's policies. Many of these issues could be addressed and resolved through good planning of future routes.

BHS hopes that the England Coast Path: Hunstanton to Sutton Bridge will include equestrians for its entirety.

Natural England's comment:

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

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

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

Relevant appended documents (see Section 6):

E British Horse Society – infrastructure specifications

Representation ID:

MCA/HSB2/R/12/HSB0089

Organisation/ person making representation:

[REDACTED] AND [REDACTED]

Name of site:

Soft shingle flood defence bank marked on map HSB 2a as trail using existing public right of way or highway.

Report map reference:

Map 2a

Route sections on or adjacent to the land:

HSB-2-S001 FP to HSB-2-S011 FP

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

This section of the sea defence is a soft shingle bank which was badly breached in December 2013. People walking along this bank are already eroding it considerably. It is suggested that the path is re-routed to the RSPB path on the inland side of the gravel pits or the intended roll back position from the earliest opportunity to avoid further erosion.

The area below the mean high-water mark is currently regularly used to recharge the beach in the Heacham area. The resulting loss of sand and height means there is an increased risk of a breach in this section of the beach where the eroded bank is our only line of defence.

These issues put the RSPB reserve lakes and surrounding habitat at risk and the many properties in the area.

The respondent supports a coastal path in principle but requests it is routed in an area where it will not increase an already worrying rate of erosion.

Natural England's comment:

The proposed route for the ECP is on a public footpath that was designated in 2014. It fulfils the core criteria of being close to and having views of the sea.

The bank is maintained by the Environment Agency as a flood defence structure and so is regularly inspected. The beach recharge work is also overseen by the Environment Agency. The Agency did not make any representations about the route of the ECP being proposed on the shingle bank, that they already maintain as a popular public footpath.

Representation ID:

MCA/HSB2/R/18/HSB0008

Organisation/ person making representation:

DISABLED RAMBLERS

Name of site:

Whole report

Report map reference:

Map HSB 2a to Map HSB 2g

Route sections on or adjacent to the land:

1. Report HSB 2: Accessibility statement at 2.2.7 and all route sections generally.
2. Map HSB 2g Route section HSB-2-S062

Other reports within stretch to which this representation also relates

Summary of representation:

Comment 1

Report HSB 2: Accessibility statement at 2.2.7 and all route sections generally.

Paragraph 2.2.7 of the Report states:

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

- The trail would follow an uneven grass or bare soil path along the top of banks;
- *it would be necessary to ascend/descend the bank by a set of steps and an earth slope.*

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

that users of all-terrain mobility scooters are used to managing. Modern batteries are now available that allow a range of up to 60 miles on one charge.

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

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

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

Disabled Ramblers requests:

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

Comment 2

HSB 2g Route section HSB-2-S062

Paragraph 2.2.7 of the Report goes on to state:

Walkers using the trail to the east will have become used to villages every few miles but in this section the distance between Shepherd's Port and King's Lynn is 18km and so walkers are remote from local facilities and support.

Disabled Ramblers accepts Natural England's comment regarding the remoteness of a significant part of the route between Shepherd's Port and King's Lynn. However, it is entirely reasonable for a user of an all-terrain mobility vehicle to set out from King's Lynn to go as far as they wish and are able to do so. It is important therefore that the infrastructure along the route does not prevent them from doing this.

A field gate is proposed on section HSB-2-S062. Disabled Ramblers requests that a suitable pedestrian gate is also provided, positioned beside the field gate, otherwise, a York gate for off-road mobility vehicles.

Natural England's comment:

Response to Comment 1

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

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

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

NE also notes the Disabled Ramblers' pertinent advice regarding the larger/ all-terrain mobility vehicles and believes that many parts of the Hunstanton to Sutton Bridge Stretch, including the great majority of the alignment covered by Report HSB 2, lend themselves to use by such vehicles.

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

Response to Comment 2

NE accepts the Disabled Ramblers' comment about replacing the gate at HSB-2-S062 and should the Secretary of State approve the proposals Natural England would be happy to provide the required gates.

Relevant appended documents (see Section 4):

The Disabled Ramblers Document: *Man-made Barriers and Least Restrictive Access*

Representation ID:

MCA/HSB2/R/9/HSB0841

Organisation/ person making representation:

[REDACTED]

Name of site:

Snettisham saltmarsh

Report map reference:

Map HSB 2b, HSB 2c to HSB2g, HSB E2

Route sections on or adjacent to the land:

HSB-2-S053

HSB-2-S055 to HSB-2-S062

Other reports within stretch to which this representation also relates

N/A

Summary of representation:Saltmarsh

[REDACTED] wishes to protest at the exclusion of access to the whole area of saltmarsh south of the RSPB reserve and north of Wolferton Creek.

He says that historically this area has been available to local people for informal recreation - to walk, picnic and sunbathe: the creek forms a well-defined natural boundary, and density of scrub vegetation limits extent of access and excessive use of the area.

Fencing

[REDACTED] says there seems little point fencing off well established paths at section HSB-2-S053. He says it will inevitably result in the creation of new routes over previously unwalked areas.

Route

[REDACTED] says that on Maps HSB 2c to HSB 2g it seems contrary to align the route on the landward side of the sea wall as the main attraction is to ornithologists.

Natural England's comment:

[REDACTED] raises several points:

Saltmarsh

[REDACTED] says that historically this area has been available to local people for informal recreation - to walk, picnic and sunbathe.

The Scheme, in 6.6.12 gives grounds on which NE can restrict or exclude coastal access rights. In Report 2 Sec 2.2.12 NE has proposed excluding access to saltmarsh because they are satisfied that it is unsuitable for public use.

In the proposal report NE explains that these directions will not prevent or affect:

- any use of the land by existing right; such use is not covered by coastal access rights,
- use of any registered rights of common or of any individual or local rights that operate at common law or by Royal Charter etc.; or
- any use that people already make of the land with the express permission of the landowner, or where such permission is implied by existing signage, site management arrangements etc.

Any such use that already takes place locally is not prohibited or limited by these arrangements - though it remains open to the landowner, as now, to vary any existing permissions.

The proposals therefore do not change the historic use that local people have enjoyed.

Fencing

When Natural England investigated the area of the RSPB reserve at HSB-2-S053 they found several paths had developed in the vegetation going seaward of the proposed ECP route. NE was concerned that users of the ECP may, by accident follow these paths that go further into areas of saltmarsh that are dead ends. The Habitats Regulations Assessment aims to identify, manage, and mitigate potential impacts of the England Coast Path and NE has identified that these unofficial paths may create a potential impact (HRA pg 63). NE has proposed that directional signage and short lengths of fences across these paths (possibly temporary) will reduce the amount of use by walkers following false 'desire' lines in the vegetation.

The aim is to allow these paths to re-vegetate if they have been created by accidental use. NE will work with the RSPB to assess future use and management of the area.

Route

Please refer to the NE response to the RSPB above about the proposed route alignment on maps 2c to 2g. A route on top of the bank for much of this length was not supported by the HRA because of the potential for disturbance to designated bird species on the seaward side of the bank.

Representation ID:

MCA/HSB2/R/4/HSB0836

Organisation/ person making representation:

CYCLING UK - [REDACTED]

Name of site:

Whole report

Report map reference:

HSB 2

Route sections on or adjacent to the land:

HSB-2-S001 to HSB-2-S062

Other reports within stretch to which this representation also relates

Reports 1 and 3

Summary of representation:

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

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

Cycling UK is developing new Cycle Hubs across Norfolk as part of the EXPERIENCE tourism project in conjunction with Norfolk County Council, to boost visitor numbers and equip local businesses to better attract cycle tourists. It is exploring potential hub locations along the north west Norfolk coast and will promote local cycle routes and itineraries as part of this. Cycling access on this stretch of England Coast Path would allow cyclists to visit local tourism businesses (who Cycling UK is training to be Cycle Friendly as part of this project) and promote the appeal of the regional identity of north west Norfolk to the cycling community.

Natural England's comment:

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

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

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

Relevant appended documents (see Section 6):

Map of suggested route within Report 2

Representation ID:

MCA/HSB2/R/5/HSB0612

Organisation/ person making representation:

[REDACTED]

Name of site:

Area between Wolferton and South Outmarsh

Report map reference:

Maps HSB 2c, HSB 2d, HSB 2e

Route sections on or adjacent to the land:

Path lengths HSB-2-S055 to HSB-2-S059

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

Information boards are mentioned in the HRA for the path lengths HSB-2-S055 to HSB-2-S059 where the path is to be on the landward side of the sea-bank. These boards need to fully and carefully explain the reasons why the path is in the position it is. At the same time walkers need to be provided with a safe and reasonable means of periodically being able to look out over the top of the bank at the saltmarsh and its inhabitants.

[REDACTED] suggests that these should take the form of open bird hides (i.e. no roof) on the landward edge of the bank with steps up from the path, with space so that 2 people at a time could look through a viewing slot while keeping their outlines concealed from the birds. He suggests at least 1 hide for each half kilometre would be needed generally but more frequently near the north and south ends of these lengths as people try them out.

If viewing opportunities are not offered, he thinks that despite any warning notices, people will keep climbing up the bank to look over it. After all a basic criterion of the path is to be within sight of the sea.

Natural England's comment:

Natural England welcomes the detailed thought that [REDACTED] has given to ways for people to view the birds in the Wash. There are practical considerations of the design and positioning of any viewing platforms, so they don't compromise the flood defence function of the bank. The HRA says that viewing platforms have been considered and NE will continue to work to that aim. Walkers will have views from the top of the bank at the junction of HSB-2-S054 and HSB-2-S055.

Representation ID:

MCA/HSB2/R/2/HSB0661

Organisation/ person making representation:

[REDACTED]

Name of site:

Area of Wootton Marsh, North Wootton.

Report map reference:

Maps 2e and 2f

Route sections on or adjacent to the land:

HSB-2-S059 and HSB-2-S060

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

There is no existing public access to the coast between Snettisham RSPB reserve and South Outmarsh, King's Lynn.

However, the junction of HSB-2-S059 and HSB-2-S060 is an obvious point to join the proposed coast path via North Wootton village.

A minor road (North Wootton to Estuary Farm) ends ~1.5km from the proposed ECP route. There are many farm tracks in this area, including between Marsh Road and the proposed ECP, which are used for walking by local people. This use has been traditionally tolerated by the owners and occupiers.

For local people this route is more attractive than using the King's Lynn bypass to join the ECP at South Outmarsh.

[REDACTED] says there is also potential for a circular route using the ECP to link the Woottons with Wolferton/Sandringham Estate and Castle Rising.

He understands that Natural England does not have a duty to create points of access.

He says that this ECP report could underline the likelihood of increased walking in this area and communicate the impact of the ECP to Norfolk County Council and landowners. Recognition and dialogue would aid in pre-empting owner/occupier concerns that arise because of increased visitor numbers.

[REDACTED] thinks that creating rights of way/permissive path may be unnecessary. Minimal signage though would enable joining the ECP at this point more safely and without disrupting ongoing environmental/land management in the area.

Natural England's comment:

Natural England welcomes this pro-active consideration of how the ECP might increase access to the coast.

However, as [REDACTED] mentions Natural England does not have any role or mandate to create any other route that might link with the ECP or any current tolerated access. Now the reports have been published there is no opportunity to make amendments to them to mention a potential increase in walkers from the Woottons.

The creation of circular routes off the ECP is outside Natural England's remit in its coast path work however NE has passed these comments on to Norfolk County Council (Norfolk Trails) who will separately consider circular routes, as it has done previously with open sections of the ECP.

Representation ID:

MCA/HSB2/R/7/HSB0613

Organisation/ person making representation:

[REDACTED]

Name of site:

South Outmarsh

Report map reference:

Maps 2f and 2g

Route sections on or adjacent to the land:

HSB-2-S061 to HSB-2-S062

Other reports within stretch to which this representation also relates

N/A

Summary of representation:

[REDACTED] explained the annual management of his cattle to provide a background on what he saw were the concerns about the alignment proposal:

- start turning cattle out on 1st April, to loading pen then onto the landward side of the bank. They are held on a 0.8-mile section from the loading pen, to just beyond the first water trough (both water troughs are at the foot of the bank land side).

The marsh is brown and boggy, whereas the bank is lush and green and so cows and calves spend all their time on the bank, where there is more fresh grass land side than anywhere else.

- bulls are introduced in early May, cows and calves up until July.
- by the end of April, the herd is on the whole marsh, the cow's will not take their calves onto the marsh until they are strong enough.
- as the marsh gets green and dryer the cows with older calves start grazing the tidal marsh and they generally stay in the area of marsh between the two water troughs. Grazing salty grass and being in full lactation means these cows return to the water troughs at the foot of the bank land side to drink every couple of hours, often spending hours around the troughs.
- during excessive hot weather the herd will often sit on the top of the bank, probably for the breeze and relief from the flies, also they are not far from their water supply.
- during periods of heavy rain or strong winds the herd will take shelter at the foot of the bank, sometimes for several days.
- in September, to make removing the herd easier feeders are positioned at the foot of the bank land side, near the first water trough; also, the cows are fed from the truck on top of the bank so eventually they follow the truck.
- at the end of October, the whole herd is confined to the first 0.8-mile section to be removed in November. If there were any walkers near the loading pen, the cattle would not go in. Tides are generally larger in November, and so it is easier to get the herd into the loading pen on high tides, the presence of walkers anywhere near the loading pen would deter them from going in.

Concerns

[REDACTED] says that cows are very protective of their calves and it would be dangerous for a walker to go anywhere near them. He says that walkers could easily find themselves trapped

between cows and calves, or two large groups of cattle with the tidal marsh on one side and a large water-filled drain on the landward side. He says that if the walkers have a dog with them even if it was on a lead, the dog and the walkers would certainly be chased. The dog would be faster than the cattle, but they would be faster than any walker.

The bulls are also an issue, they are most active from May to August. Cattle are timid by nature, and presence of walkers, near the water troughs, would deter them from going for water. There is also the risk they could be frightened by walkers and falling into a creek where they can get stuck and die, both are important welfare issues.

If the footpath is permitted, [REDACTED] says there should be clarity on who will take responsibility for the death and injuries of walkers. [REDACTED] says that councils and government departments must be fully aware of how many walkers are killed and seriously injured while using foot paths through field containing cattle. The cattle involved in these tragedies, do not purposely attack walkers, they are merely defending themselves and their calves from the threat walkers poses to them, the solution to prevent these deaths is not permit public access in or near field's containing cattle.

In 2022 there will be 200 cows and calves together with 5 mature bulls grazing on the bank and marsh, although [REDACTED] does not have a problem with any of them, strangers especially with dogs would have an altogether different reaction.

The bank is only 30 metres wide, on high tides the whole herd is concentrated on that narrow strip of land. Anything over a 5.5 metre tide has the potential to cover the marsh and push the cattle on to bank. [REDACTED] says it is irresponsible and reckless to expect walkers to negotiate their way through the herd without issue. Regrettably it will be a case of when a walker gets killed (most likely more than one) rather than if.

[REDACTED] has attached an article from Farmers Weekly (included below). He noticed it mentioned that up to 24% of injuries involved the farming community but didn't mention the other 76%. [REDACTED] noted the final paragraph that non farmers are also at risk, particularly in England where a considerable network of public footpaths crosses farms and fields. He said that comments like those are also under-reported and awareness should be raised of the public health risk and should be a cause for concern.

[REDACTED] has noticed that the proposals include notice boards to explain how to react around the cattle but, other than ask people not to walk on proposed area, [REDACTED] is unclear what can be done to protect walkers from the herd.

Wildlife

[REDACTED] does not think that walkers will stay at the foot of the bank land side, as the route is not coastal, with a bank on one side and arable fields on the other side. On the other side of the Great Ouse he has seen many people wondering all over the tidal marsh, often with dogs, with no regards for nesting birds or their own safety. There are a large number of nesting birds in the grazing area, given the constant disturbance over the river and if the footpath is permitted [REDACTED] thinks the walkers will be everywhere regardless of whatever signs are in place, the nesting window between the high tides in the summer is short, by the time Bird wardens / staff realise there is a problem the damage will have been done, the birds will have nowhere safe to nest.

The only way to protect wildlife is to keep this area private. Permitting walkers on top of the bank in the central area will still cause disturbance.

Other impacts

When walkers have been on the bank there is often litter and other waste left behind, they don't close the gates either, if the herd were to escape, they could cause thousands of pounds worth of damage to crops on the farm, this would make the farm want to stop grazing the marsh.

At present [REDACTED] runs a closed herd, the prospect of walkers from all over the country walking over grazing grass, has the potential to spread disease, (those coming from a Tb 1 area are the most dangerous) he states it is an unacceptable risk, and should not be permitted.

The land agents and farm owners do not want the footpath / walkers on any of the farm's internal tracks for health and safety reasons, as there is a lot of large farm machinery using these tracks. [REDACTED] can fully understand why, although the majority of people seem to use the farm tracks and the level surface, no cattle and less flies might be the reason why; some of the walkers have been multi-generational families, they would not be safe on the bank.

[REDACTED] says the farm does not want the footpath on the farm tracks, and so, if another route cannot be found, he is concerned grazing would be stopped. It would be devastating for his business, also for managing the marsh for the benefit of birds, both conservationists and wild fowlers, have explained the benefits of grazing cattle.

A far better alternative would be to complete the cycle path from Kings Lynn to Hunstanton this would bring more benefit to the area.

Natural England's comment:

Natural England has considered the new information provided in the representation and objection. The Scheme says that the ECP may cross land grazed by cattle and that cattle will normally avoid people but it also says that exceptionally the trail may be aligned to avoid fields with cattle. The details of the objection show that the sea bank and landward area are used by cattle and make the point that in those situations walkers do not have an option of being distanced from them. NE discussed its concerns with the agent (who through a related company is also the agricultural tenant) and asked how the concerns could be mitigated, but did not receive a response.

Having reviewed the position and options in the light of this new information based on the current grazing regime, NE considers there is scope for a change of alignment at this point that would avoid the feared conflict, without imposing any real detriment on the public interest or on any other relevant interest in land.

On the assumption that the current grazing regime is to remain in place, NE therefore proposes in the objection for HSB-2-S061 to move the route from the landward edge of the bank to the seaward edge of the inland arable field. The original proposal and the new route do not have any view of the sea and so there is no detriment in these terms, and the change could be done at minimal cost. The field has previously been cultivated with a wide uncropped margin (photo attached). This would link at both ends with adjacent route sections.

NE recognises that the owner of the bank and field, together with their agricultural tenant (for the arable field), would prefer the route to be on/near the bank, but we do not consider there would be any significant impact from such an alignment on their operations.

[REDACTED] raises concerns about the impact of wildlife, as he thinks walkers will be on the bank top rather than on the route at the landward base of the bank. Natural England has

considered this situation and is proposing information boards so walkers can understand the reasons for the route and the implications of being on the bank. Should these prove ineffective then restrictions and ultimately a change to the route will be considered.

[REDACTED] is concerned about the spread of TB to his cattle but the incidence of TB is rarely recorded in dogs so the risk of a pet dog firstly coming into contact with the infection through eating infected cow products and then walking in this area while exhibiting symptoms is very low.

[REDACTED] - Cattle injuries – Farmers' Weekly article

Representation ID:

MCA/HSB2/R/1/HSB0369

Organisation/ person making representation:

[REDACTED]

Name of site:

Whole report

Report map reference:

Maps 2a to 2g

Route sections on or adjacent to the land:

HSB-2-S001 to HSB-2-S062

Other reports within stretch to which this representation also relates

Reports 1 and 3

I fully support the proposals of creating a public right of way along the proposed route between King's Lynn and Hunstanton that currently do not exist. I believe this will be a major attraction and will help the local economy with tourism. It will also provide a fantastic amenity for residents to explore new areas of the local environment which are currently "off-limits" with no public access. As a keen walker myself I fully welcome the opportunity to walk this stretch of coast where no such opportunity has previously existed.

Summary of representation:

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

Natural England's comment:

Natural England welcomes this support for the ECP.

Representation ID:

Organisation/ person making representation:

Water Management Alliance - King's Lynn Internal Drainage Board – [REDACTED]

Name of site:

Whole report

Report map reference:

HSB-2-S001 to HSB-2-S062

Route sections on or adjacent to the land:

HSB-2-S001 to HSB-2-S062

Other reports within stretch to which this representation also relates

Reports 3 and 4

Summary of representation:

There is appreciation that there has been engagement between the IDB and Coast Path staff.

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

IDB said that the currently proposed route is close to Board drainage infrastructure including several pumps and multiple Adopted watercourses. Any works (including posts and gates) within 9 metres of said infrastructure generally require consent to relax Byelaw 10 (no works within 9 metres of the edge of drainage or flood risk management infrastructure), however officers believe that in this case an exemption may be more suitable in accordance with the Boards Byelaw 26.

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

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

Natural England's comment:

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

Representation ID:

MCA/HSB2/R/8/HSB0837

**Organisation/ person making representation:
WASH FRONTAGES GROUP**

Name of site:
Whole report

Report map reference:
Maps 2a-2g

Route sections on or adjacent to the land:

HSB-2-S001 to HSB-2-S062

Other reports within stretch to which this representation also relates
Reports 3 and 4

Summary of representation:

In response to 4.2.18 - 'Natural England is able to propose that the route of the trail would be able to change in the future, without further approval from the Secretary of State, in response to coastal change'.

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

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

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

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

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

Natural England's comment:

The points raised here have also been raised by other respondents and so please refer to the response to the first representation above, from the CLA.

4. Supporting documents

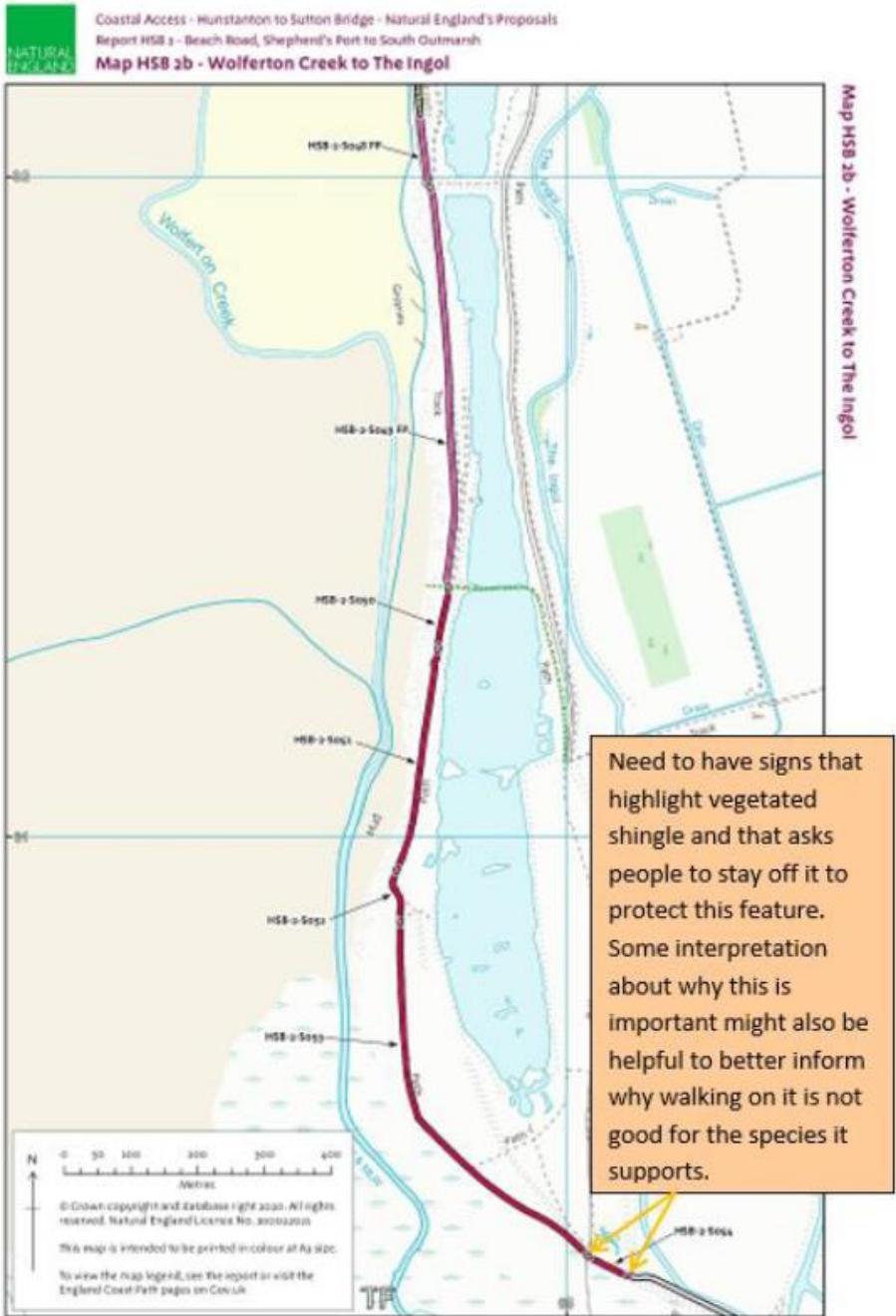
A National Farmers Union

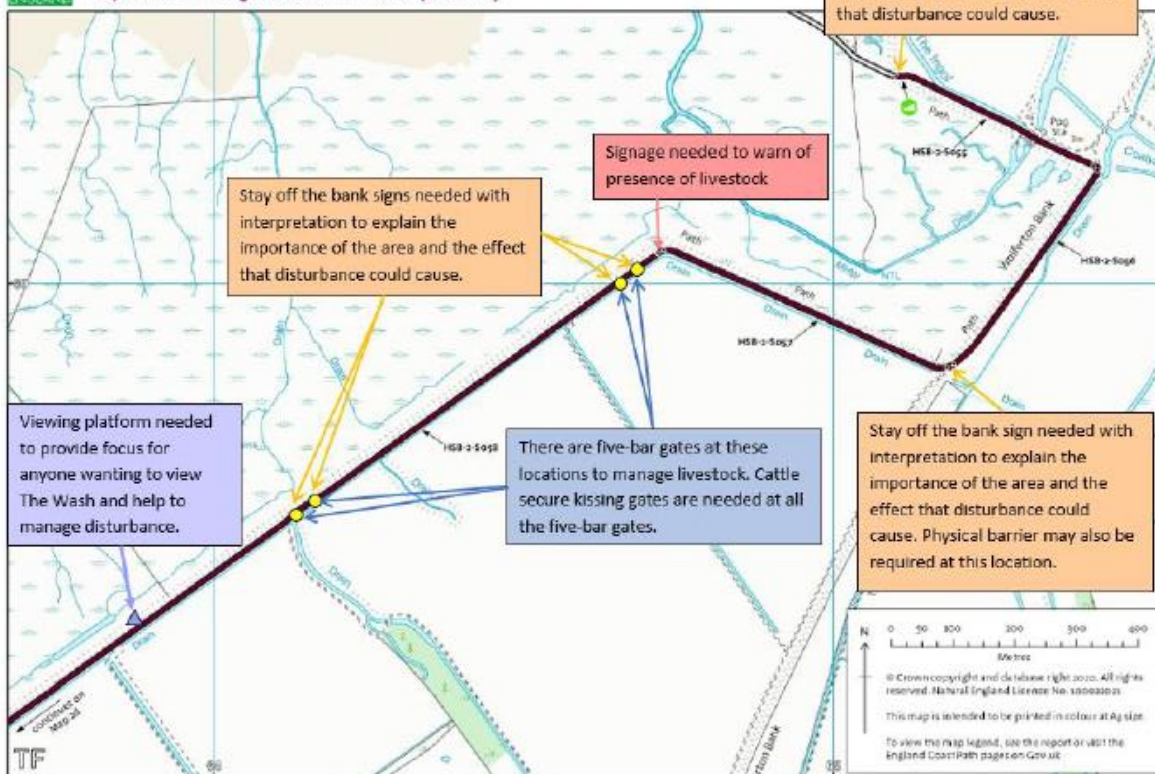
Water Resources East - Initial Water Resources Position Statement

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

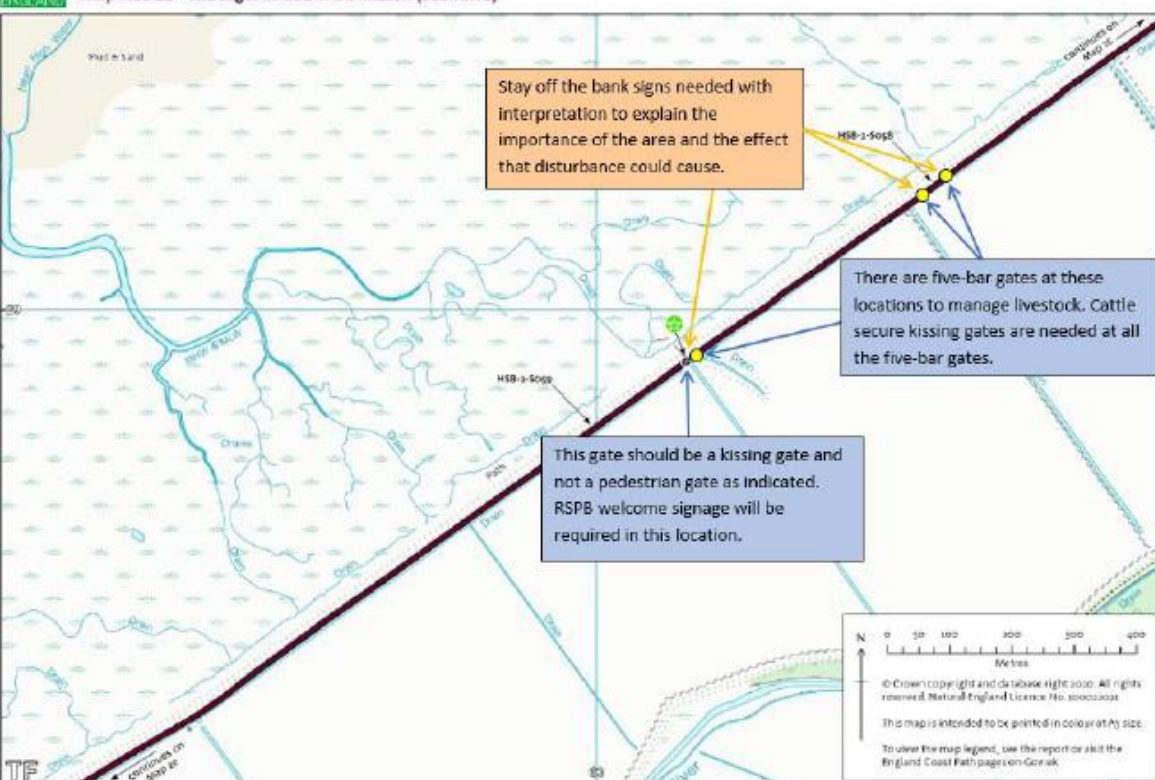
B RSPB

Appendix 3: Comments on Maps 2b, 2c and 2d indicating where the RSPB considers additional or alternative infrastructure is required to manage footpath users and livestock.



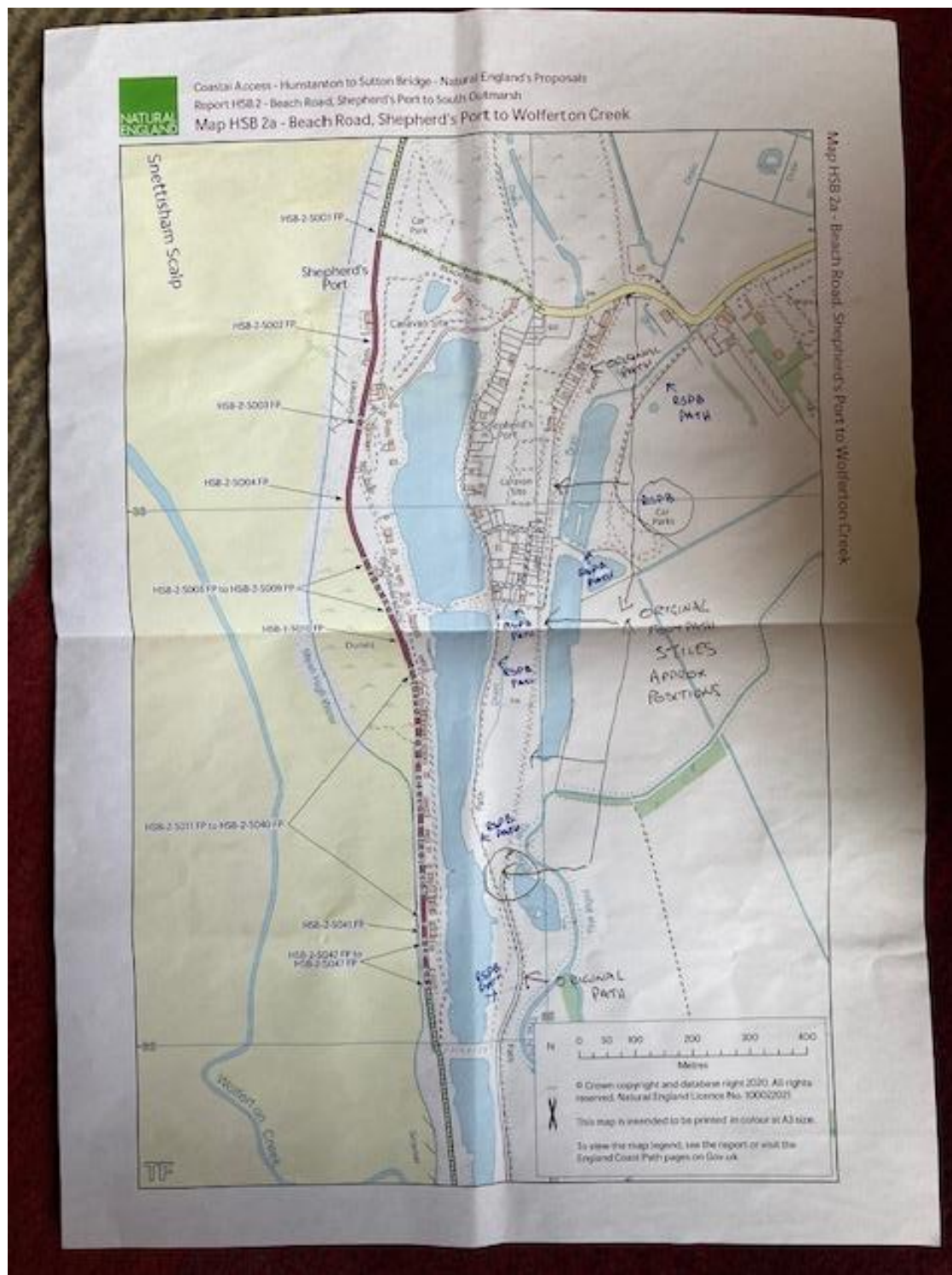


Map HSB 2c - The Ingol to South Outmarsh (Section 1)



Map HSB 2d - The Ingol to South Outmarsh (Section 2)

C Snettisham - Inland route suggestion

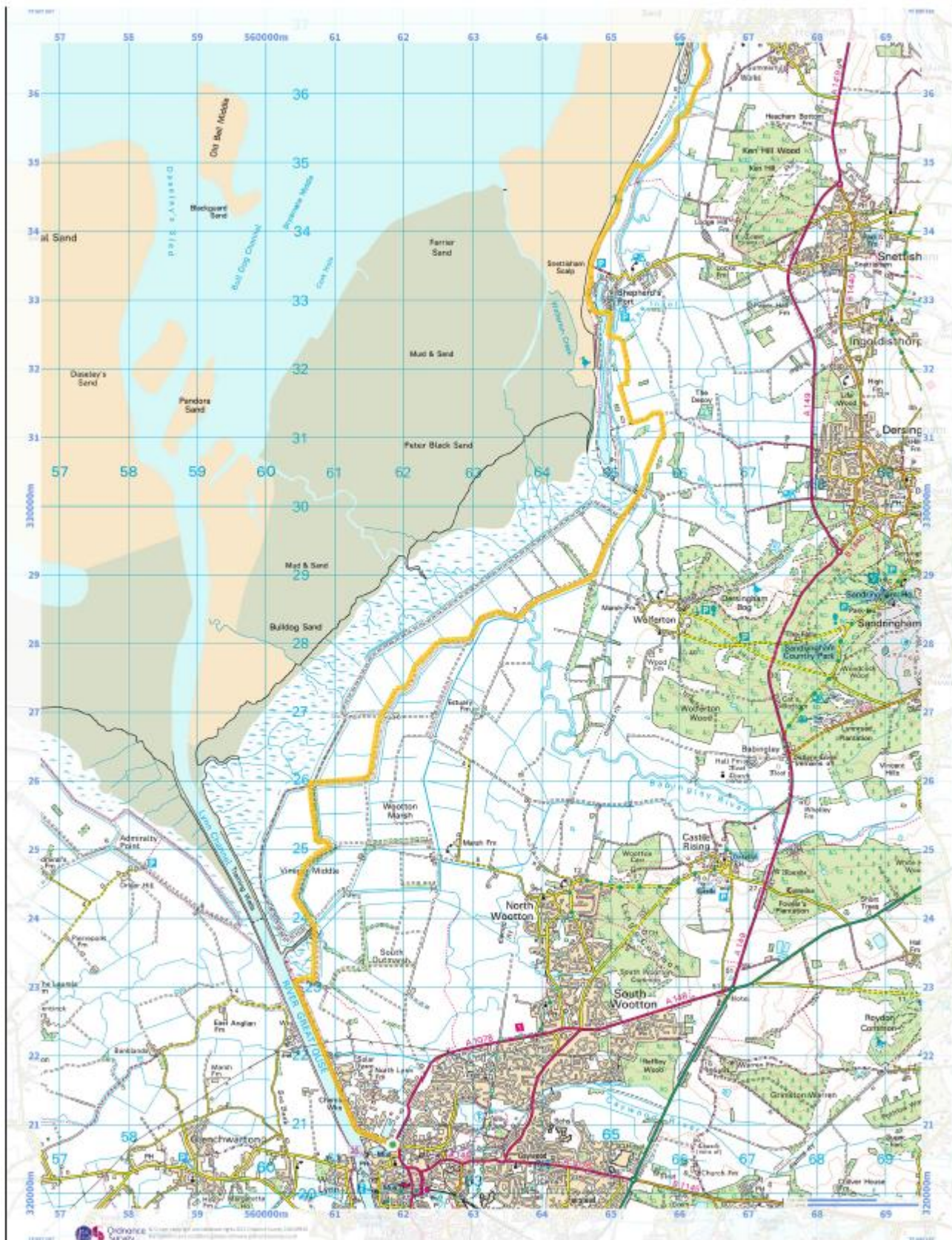


D British Horse Society - Infrastructure specifications

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

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

Cycling UK – suggested route within Report 2



Route Information

Route Name

Route Summary

Total Distance	26.0km (16.1mi)	Walk	5h 30min
Elevation	3m at lowest point	Run	2h 21min
	7m at highest point	Cycle	1h 36min
Total Ascent	48m		

Elevation Profile



Route Card

#	OS Grid Ref	Dist from start	Latitude	Longitude	Elevation
1	TF 618 207	0.00km	52° 45' 35" N	0° 23' 49" E	6m
Dist to next: 25.98km, Bearing to next: 14°, Ascent to next: 48m					
2	TF 668 400	25.98km	52° 55' 55" N	0° 28' 51" E	4m

F Disabled Ramblers: *Man-made Barriers and Least Restrictive Access*



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

Registered Charity Number 1103508

Man-made Barriers & Least Restrictive Access

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

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

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

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

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

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

Disabled Ramblers campaign for:

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

Useful figures

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

Gaps

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

Bollards

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

Pedestrian gates

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

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

Field gates

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

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

Bristol gates

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

Kissing gates

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

Note about RADAR locks on Kissing gates

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

- Rider cannot get off mobility vehicle to reach the lock
- Rider cannot reach lock from mobility vehicle (poor balance, lack of core strength etc.)
- Position of lock is in a corner so mobility vehicle cannot come alongside lock to reach it, even at an angle
- RADAR lock has not been well maintained and no longer works properly
- Not all disabled people realise that a RADAR key will open the lock, and don't know how these kissing gates work. There must be an appropriate, informative, label beside the lock.

Board walks, Footbridges, Quad bike bridges

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

Sleeper bridges

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

Steps

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

Cycle chicanes and staggered barriers

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

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

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

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

Stepping stones

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

Stiles

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

Urban areas and Kerbs

In urban areas people with reduced mobility may well be using pavement scooters which have low ground clearance. Where the path follows a footway (e.g. pavement) it should be sufficiently wide for large mobility vehicles, and free of obstructions. The provision and correct

positioning of dropped kerbs at suitable places along the footway is essential. Every time the path passes over a kerb, a dropped kerb should be provided.

Disabled Ramblers March 2020

G [REDACTED]- Cattle injuries – Farmers' Weekly article

NEWS

Injuries from cattle 'as bad as high-speed car accidents'

By Johann Tasker

Farm accidents involving cattle are resulting in injuries as severe as those seen in high-speed car crashes, says a surgeon.

Injuries among farmers arriving at hospital A&E departments following cattle-related incidents include spinal trauma, broken limbs and crushed chests and abdomens.

"Some of these injuries are equivalent to high-velocity car crashes," said John-Henry Rhind, an orthopaedic surgeon at Royal Stoke University Hospital in Staffordshire. "It is quite alarming and something many people aren't aware of."

Mr Rhind said he was so concerned about the nature and extent of the injuries that he wrote an academic paper examining the subject.

Severe injuries

Mr Rhind reviewed 67 cattle-related accidents over a five-year period. Findings from his study – the first of its kind – are due to be published in *The Journal of Emergency Medicine and Shock*.

Seventy per cent of patients required overnight hospital admission, two died despite receiving hospital treatment. Half of those farmers arriving at A&E after a cattle accident required an operation. These ranged from broken bones requiring the insertion of a metal plate to serious spinal surgery and chest wall reconstruction.

Cattle-related injuries are a significant cause of severe morbidity and mortality, the study says. They are also under-reported and awareness should be raised of the public health risk.

"Patterns of injury are similar to high-velocity road traffic collisions," the study says. "Bull-related injuries, or trampling in particular, should alert the clinician to more significant trauma."

Fractures were the most common injury associated with bovine trauma, followed by cardiothoracic and neurological damage. The study also highlights the significant chest and head injuries most associated with fatalities.



The study found that a significant number of farmers injured by cattle required an operation

CASE STUDY: RICHARD ISAAC

Woolf and sheep farmer Richard Isaac suffered three broken ribs in an accident involving a heifer at his farm near Yvysyawl in Mid-Glamorgan.

Mr Isaac said he always put farm safety first – but was taken by surprise on this occasion when a normally docile animal panicked and tried to force her way through a gate.

The gate sprang forward, throwing Mr Isaac face-down on the ground. He was helped to his feet, but an X-ray later showed he had three broken ribs.

Urging others to take care when working with cattle, Mr Isaac said: "The accident could have been so much worse. I could easily have lost the ability to work altogether, but I am confident that in time, I should get back to full strength."

Trampling injuries were most common, with 86% of trampled patients suffering major trauma. Indirect injuries included being crushed against a farm gate.

Up to 24% of the injuries involved farmers and farmworkers or their family members. Older farmers are more likely to be involved in a cattle-related accident, the study suggests, with men over 50 being the most common demographic. Injuries among older farmers were also more severe, consisting of multiple traumatic injuries.

But the paper says non-farmers are also at risk, particularly in England where a considerable network of public footpaths crosses farms and fields.

Vegans 'more likely to suffer bone fractures'

Vegans are more likely to suffer bone fractures compared with people who eat meat, new Oxford University research has shown.

The results from an 18-year study reveal that vegans, vegetarians and pescatarians have a higher risk of any type of fracture compared with meat eaters, and non-meat eaters have a significantly greater risk of hip fractures.

"This is the first comprehensive study on the risks of both total and site-specific fractures in people of different diet groups," said lead author Tammy Tong, a nutritional epidemiologist at the Nuffield Department of Population Health.

"We found that vegans had a higher risk of total fractures, which resulted in close to 20 more cases per 1,000 people over a 10-year period compared to people who ate meat."

Possible reasons given were the typically lower body mass index of non-meat eaters, and the lower intake of calcium and protein.

The results of the Epic-Oxford research project were based on data from nearly 55,000 men and women living in the UK recruited between 1993 and 2001, including about 2,000 vegans. Almost 4,000 fractures occurred in total during the 18-year period.

The AHDB pointed to the nutritional benefits of red meat and dairy, which are a good source of a number of vitamins and minerals that support health and wellbeing, including calcium, zinc and phosphorus, which are key to maintaining strong and healthy bones.

14 FARMERSWEEKLY 27 NOVEMBER 2020