

Coastal Access – Felixstowe Ferry to Bawdsey, FFB2 and FFB3



Representations and Natural England’s comments

December 2021

Contents

1. Introduction	1
2. Background.....	1
3. Record of ‘full’ representations and Natural England’s comments on them	3
4. Summary of any similar or identical points within ‘other’ representations, and Natural England’s comments on them	7
5. Summary of ‘other’ representations making non-common points, and Natural England’s comments on them.....	11
6. Supporting documents	30

1. Introduction

This document details representations Natural England have received on the proposals in length reports FFB2 and FFB3. It also sets out any Natural England comments on these representations.

Where representations were made that relate to the entire Felixstowe Ferry to Bawdsey stretch they are included here in so far they are relevant to lengths FFB2 and FFB3 only.

2. Background

Natural England’s compendium of reports setting out its proposals for improved access to the coast from Felixstowe Ferry to Bawdsey was submitted to the Secretary of State on 9th December 2020. This began an eight week period during which representations and objections about each constituent report could be made.

- In relation to the report for **Sandy Lane, Waldringfield to Kyson Point**, Natural England received **19** representations, of which **2** 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 3 of this document together with Natural England’s comments where relevant.

As required by the legislation this document also summarises and, where relevant, comments on the **17** representations submitted by other individuals or organisations, referred to here as 'other' representations. Of those **17** 'other' representations, **12** contain similar or identical points. Natural England's comments on 'other' representations are set out in two parts:

The recurring themes in the **17** 'other' representations have been summarised in section 4 as **4** points, each with our comments on them.

Any of the same 'other' representations that make other, non-common points are then commented on separately in section 5 alongside any remaining 'other' representations.

- In relation to the report for **Kyson Point to Wilford Bridge**, Natural England received **2** representations, of which **0** 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 3 of this document together with Natural England's comments where relevant.

As required by the legislation this document also summarises and, where relevant, comments on the **2** representations submitted by other individuals or organisations, referred to here as 'other' representations. Of those **2** 'other' representations, **0**, contain similar or identical points.

Before making a determination in respect of a coastal access report, the Secretary of State must consider all 'full' representations and our summary of 'other' representations, together with Natural England's comments on each.

3. Record of ‘full’ representations and Natural England’s comments on them

Representation number:	MCA/FFB2/R/64/FFB0625
Organisation/ person making representation:	Royal Society for the Protection of Birds
Route section(s) specific to this representation:	FFB2 – S010
Other reports within stretch to which this representation also relates:	<i>The RSPB have also submitted a representation relating to FFB6</i>
Representation in full	
<p>Section FFB-2-S010 of this section of the coast path leaves the cover of vegetation north of Cross Farm and goes onto the open area between the lagoons to the west and area of saltmarsh behind the break in the sea wall to the east. Although screening has been suggested to prevent disturbance of birds in the adjacent saltmarsh by recreational users, it still seems a very high-risk option to introduce recreational users here when there appear to be other possible routes, such as to the west of the lagoons inland, north of Rudd’s Barn, as represented on Map FFB 2a.</p> <p>A reminder of the importance of this area for birds, as summarised in Mason, Excell and Meyer (2014), page 16:</p> <p><i>“This section has developed in importance since the river wall was breached and the area at TM277460 has become flooded. There is always water present even when the tide is out. It has developed so much that <u>it must remain free from human disturbance</u>...”</i></p> <p><i>The area is very good for <u>Redshank</u>... Other waders include Grey Plover, Dunlin, Black-tailed Godwit and Turnstone... <u>The saltmarsh may have loafing Brent Geese</u>...”</i></p> <p>Note that dark-bellied brent goose is a feature of the Deben Estuary SPA and Ramsar site. Redshank occur in nationally important numbers on the estuary, and have been chosen as Suffolk Coast and Heath AONB’s flagship species for its Nature Recovery Plan (in development) which will recognise the importance of minimising disturbance to estuary birds.</p> <p>The RSPB considers that re-routing this section inland, as described above would be the lowest risk option to minimise potential recreational disturbance to an important area of saltmarsh which is part of the Deben Estuary SPA and Ramsar site.</p>	
Natural England’s comments	
<p>This is a complex area in the stretch and very significant time and effort was spent by Natural England assessing the originally planned route north of Cross Farm, which ran past the lagoons then east to the Footpath on the river wall and north to Martlesham. After several weeks (including discussion with Nick Mason and Andrew Excell, from Suffolk Wildlife Trust) it was agreed that the best alignment would be to run the route north of the lagoons inland of the seawall. This was because this route avoids the vast majority of the important saltmarsh area, and</p>	

Natural England concluded that installing a screen at a vulnerable point east of the lagoon would avoid disturbance there.

Natural England felt this was a fair solution to largely avoiding the sensitive saltmarsh area, whilst recognising that the arable fields close to the final route are also used in winter by curlew and black-tailed godwit, among others. Natural England understood that [Redacted] and [Redacted] were pleased that this route had been chosen, rather than following the river wall.

In relation to the trail, Natural England is required by section 297(2) of the 2009 Act to have specific regard to the desirability of it adhering to the periphery of the coast and provide views of the sea. The Coastal Access Scheme also guides us to propose the least restrictive option. In this instance Natural England believe we have met these two aims without putting the designated features at risk. The proposed screen by the lagoons will be regularly checked and repaired as necessary. Should new information come to light, or circumstances change, then the England Coast Path route and restrictions can be reviewed in the future.

Relevant appended documents (see section 6):	
Representation number:	<i>MCA/FFB2/R/89/FFB0453</i>
Organisation/ person making representation:	The Ramblers
Route section(s) specific to this representation:	<i>FFB-2-S001 to FFB-2-S038</i>
Other reports within stretch to which this representation also relates:	<i>The Ramblers have also submitted representations relating to FFB 4 and the Whole stretch</i>
Representation in full	
<p>This representation is made on behalf of Suffolk Area Ramblers, and are attached to the general representation form for the whole section.</p> <p>All of this section was surveyed by members of Suffolk Area Ramblers in the winter of 2018 - 2019, and meetings were held with the relevant Suffolk County Council Rights of Way Officers.</p> <p>Following further discussion with interested members of the Ramblers in the area, maps of the Ramblers suggested route, together with a detailed report of why we were recommending this route, and what works we considered to be necessary, were then submitted to Natural England in March 2019.</p> <p>Subsequently I have been in regular contact with the Natural England representatives for this section, and have made some further visits to the proposed section of path as changes in the situation occur. Also, I have been appraised regularly of the differences between our initial suggestions and the Natural England preferred route, all of which changes have been explained and the reasons for alternative routes discussed.</p> <p>Finally, the Report published on Wednesday 9th December 2020 has been made available to all interested parties in the Ramblers and local area groups. The responses from those consulted have been generally favourable, and any</p>	

comments I have felt worthwhile in passing on to you for consideration, are on the accompanying notes 2 and 3.

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

[Redacted]

Suffolk Area Ramblers Coastal Access Officer
28th January 2021

2.This representation is made on behalf of Suffolk Area Ramblers, and refers to the representation form for the sections FFB2.

The Ramblers would like to commend the section FFB2 as a major improvement over the initially suggested inland route using a public highway, or adjacent field edges.

We welcome the fact that the proposed route is now all off road.

Some members have however expressed disappointment that the route is not linking up to the existing public right of way along the river edge from FFB-2-5022 down to the river wall just northeast of the point FFB-2-5010, which would in practice, be just a very short link.

However, we understand that including this route could potentially have an adverse environmental effect as it would mean a much greater footfall along the existing public right of way, which is currently a cul-de-sac route, and following on from our survey, a considerable amount of work would be needed on the ground to bring it up to coastal path standard.

One member queried if the existing cul-de-sac route could be marked as a coast path cul-de-sac, which might be worth considering, although I personally am happy with the current status, which means that the path is not over-used, but remains accessible for those few keen nature watchers who know it is there, and accessible although difficult in parts.

[Redacted]

Suffolk Area Ramblers Coastal Access Officer
28th January 2021

Natural England’s comments

Natural England welcome the Suffolk Area Rambler’s supportive comments.

Section 2.3.2 of Natural England’s Coastal Access Report outlines the other route options considered between route sections FFB-2-S001 and FFB-2-S022. Natural England did not consider repairing the breach in the seawall to enable the route to follow the footpath on the seaward edge of the estuary. Natural England felt the costs of doing so would exceed the public benefit given that the sea wall has a limited lifespan, so the route was unlikely to be sustainable over the long term. In addition, this alignment could have had a significant adverse effect on bird species on the adjacent salt marsh and grazing marsh. This breach in the seawall is noted on page 19 of the Nature Conservation Assessment (NCA) published alongside our proposals as being *“the estuary’s most important roost site for waders, supporting large numbers of a range of species, including grey plover, dunlin, bar-tailed godwit, curlew and redshank (Excell and O’Mahony, 2013, and Mason,*

Excell & Meyer, 2014)." The NCA goes into further detail regarding the value of this breached section in sections D2.1 and D2.2.

Natural England's duty under the Marine and Coastal Access Act 2009 only extends to proposing the route of the England Coast Path and associated margin of land for the public to enjoy. Natural England are not therefore able to sign a "cul-de-sac" route along the existing Public Right of Way (PRoW). However, the creation of the England Coast Path does not remove any existing public rights of way that follow different alignments in the same vicinity.

Relevant appended documents (see section 6):

4. Summary of any similar or identical points within 'other' representations, and Natural England's comments on them

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:
MCA/FFB2/R/10/FFB0462	[Redacted]
MCA/FFB2/R/11/FFB0567	[Redacted]
MCA/FFB2/R/21/FFB0494	Waldringfield Parish Council
MCA/FFB2/R/32/FFB0573	[Redacted] and [Redacted]
MCA/FFB2/R/102/FFB0438	Martlesham Parish Council
Name of site:	Waldringfield
Report map reference:	FFB 2a and FFB 2b
Route sections on or adjacent to the land:	FFB-2-S001 to FFB-2-S022
Other reports within stretch to which this representation also relates	Martlesham Parish Council's representation included another point. See below.
Summary of point:	
Support for FFB2 as it creates new access to replace that which was lost when the sea wall was historically breached, cutting off access to the PRoW.	
Natural England's comment:	
Natural England warmly welcome this support for their proposals.	
Relevant appended documents (see Section 6):	
N/A	

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:
MCA/FFB2/R/102/FFB0438	Martlesham Parish Council
MCA/FFB2/R/19/FFB0471	[Redacted]
MCA/FFB2/R/3/FFB0449	[Redacted]
Name of site:	Martlesham Creek to Waldringfield
Report map reference:	FFB 2a

Route sections on or adjacent to the land:	Sea wall east from FFB-2-S022, Existing Footpath 15.
Other reports within stretch to which this representation also relates	<p>Martlesham Parish Councils representation included one other point, detailed below in section 5.</p> <p>[Redacted] has also submitted one other representation for this chapter, detailed below in section 5.</p> <p>[Redacted] representation included another point, detailed below in section 5.</p>
Summary of point:	
<p>Requests for Footpath 15 (FP15) to be kept open and maintained. This path gives access to the mudflats and foreshore for those who wish to view the wildlife and river.</p>	
Natural England’s comment:	
<p>Creation of the England Coast Path does not remove any existing public rights of way that follow different alignments in the same vicinity.</p> <p>Public Rights of Way (PRoW) are the responsibility of the local Highway Authority which in this instance is Suffolk County Council. Applications to change the rights of way network need to be submitted to them and must follow the proper legal process.</p>	
Relevant appended documents (see Section 6):	
<p> </p>	

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:
MCA/FFB2/R/9/FFB0486	[Redacted] and [Redacted]
MCA/FFB2/R/80/FFB0606	[Redacted]
MCA/FFB2/R/73/FFB0467	[Redacted]
Name of site:	Deben Estuary
Report map reference:	FFB 2a, FFB 2b,
Route sections on or adjacent to the land:	FFB-2-S001 to FFB-2-S031
Other reports within stretch to which this representation also relates	<p>[Redacted] and [Redacted] representation included further points, detailed below in section 5.</p> <p>[Redacted] representation included further points, detailed below.</p> <p>[Redacted] representation included further points, detailed below in section 5.</p>
Summary of point:	

We would prefer the coastal path to go directly from Felixstowe Ferry to Bawdsey using the existing ferry link as the Deben is largely a river valley rather than a coastal environment. The Marine and Coastal Access Act 2009 says at 296 (7) that "For the purposes of the coastal access duty, a person is to be regarded as enabled to make a journey by ferry even if that journey can be made at certain times, or during certain periods, only." The Marine and Coastal Access Act 2009 does not give Natural England the discretionary powers to propose that the trail goes around the estuary rather than using the existing ferry, even though this ferry is only seasonal.

Natural England’s comment:

Natural England acknowledge that under the legislation people are considered to be enabled to make a recreational journey either by foot or by ferry, even if the ferry only operates at certain times. This is not the same as saying where a part time ferry exists Natural England cannot exercise the discretion outlined in section 301 of the 2009 Act to propose that the trail should extend around the estuary using the first crossing point. The decision whether, and if so how, to exercise that discretion is determined by additional statutory criteria ('the estuary criteria') which are set out in section 301(4).

This matter is clarified in section 10.3 of the governments approved Coastal Access Scheme which states that;

10.3.1 The existence of a ferry service may be an important factor in our decision, if it crosses the estuary at a convenient place downstream from the first bridge or tunnel, and is available to foot passengers.

10.3.2 Regular, year-round services such as the Mersey ferry (figure 31) better meet the requirement for a convenient crossing point than occasional or seasonal services such as the Yealm ferry (figure 37). But even regular ferry services do not rule out taking the trail up to the first public crossing point if the balance between recreational benefit and cost is right, having regard to the other statutory criteria.

10.3.3 Conversely, even where a ferry is only seasonal or part-time, it may still in all the circumstances be a significant factor in deciding where the trail should end on the estuary. For example, we may decide that the additional cost of extending the trail as far as the first bridge or tunnel is not proportionate to the extra public enjoyment of the coast that this would afford.

Section 5 of The Overview document published alongside our Coastal Access Reports explains Natural England’s estuary discretion and assesses the Deben Estuary against the statutory estuary criteria given in the legislation. It outlines the 3 alignment options Natural England considered for the Deben Estuary and proposes option 1, that the trail be aligned around the estuary crossing at Wilford Bridge. It goes on to explain why Natural England did not choose the other options.

Relevant appended documents (see Section 6):

--

Representations containing similar or identical points	
Representation ID	Organisation/ person making representation:

MCA/FFB2/R/80/FFB0606	[Redacted]
MCA/FFB2/R/91/FFB0612	[Redacted] and [Redacted]
MCA/FFB2/R/24/FFB0107	[Redacted] and [Redacted]
Name of site:	Waldringfield
Report map reference:	FFB 2a and FFB 2b
Route sections on or adjacent to the land:	FFB-2-S001 through to FFB-2-S034
Other reports within stretch to which this representation also relates	<p>[Redacted] representation included another point, included above.</p> <p>[Redacted] and [Redacted] representation included other points, detailed below in section 5.</p> <p>[Redacted] and [Redacted] representation included other points, detailed below in section 5.</p>
Summary of point:	
<p>Would prefer if the trail followed Fishpond Road and Woodbridge/Waldringfield Road, instead of creating new access along FFB-2-S001 to FFB-2-S034. The alternative Route proposed in these representations, although slightly further inland, follows a Quiet Lane. Whilst it diverts away from the river and occludes views, it is safe for pedestrians and means that wildlife is not disturbed as no new access is being created across fields.</p>	
Natural England’s comment:	
<p>Section 2.3.2 of Coastal Access Report 2 Sandy Lane, Waldringfield to Kyson Point, outlines the route options Natural England considered at Waldringfield and explains why Natural England did not propose them. This states that Natural England considered aligning route sections FFB-2-S001 to FFB-2-S0022 along Waldringfield and Woodbridge Road.</p> <p>Natural England asked Suffolk County Council’s Highways Department to assess the safety of this option and they advised that it would be unsafe for walkers due to the volume and speed of traffic, especially in the summer, the presence of sharp bends creating poor visibility and high banks preventing walkers from stepping out of the way of oncoming traffic. Natural England were therefore unable to propose it.</p> <p>It should be noted that the designation “Quiet Lane” is an aspirational designation seeking more considerate use of the road by drivers to enable safe shared use by walkers. Its success depends on ongoing local campaigns to make motorists more aware of non-motorised users and what they’re trying to achieve. Actual behaviour change can be slow and currently Suffolk County Highways Department have assessed the road as being unsuitable for the England Coast Path on safety grounds.</p> <p>Natural England propose several measures including restrictions and exclusions to protect sensitive wildlife on this stretch of coast. The restrictions relating to Coastal Access Report FFB2 are detailed in section 2.2.7 “Measures to protect the environment.”</p>	
Relevant appended documents (see Section 6):	

--

5. Summary of 'other' representations making non-common points, and Natural England's comments on them

Representation ID:	MCA/FFB2/R/25/FFB0363
Organisation/ person making representation:	[Redacted]
Name of site:	Sandy Lane, Waldringfield to Kyson Point
Report map reference:	FFB 2a, FFB 2b
Route sections on or adjacent to the land:	FFB-2-S001 to FFB-2-S031
Other reports within stretch to which this representation also relates	N/A
Summary of representation:	
Support for the coast path between Sandy Lane, Waldringfield and Kyson Point.	
Natural England's comment:	
Natural England warmly welcome the support for their proposal.	
Relevant appended documents (see Section 6): N/A	

Representation ID:	MCA/FFB2/R/102/FFB0438
Organisation/ person making representation:	Martlesham Parish Council
Name of site:	Martlesham to Waldringfield
Report map reference:	FFB 2a and FFB 2b
Route sections on or adjacent to the land:	FFB-2-S001 to FFB-2-S022
Other reports within stretch to which this representation also relates	Martlesham Parish Councils representation included another point, detailed covered in section 4.
Summary of representation:	
Martlesham Parish Council trust that the coastal trail will be well sign posted, prepared, and continuously maintained for walkers.	

<p>We would welcome measures to minimise disturbance to wildlife, particularly by dogs and low flying aircraft.</p>
<p>Natural England’s comment:</p> <p>Section 2.2.24 of Natural England’s proposals for the England Coast Path between Sandy Lane, Waldringfield and Kyson Point outline the works needed to physically establish the trail which includes the provision of signage. Should the Secretary of State approve these proposals Natural England will work with Suffolk County Council to establish the route on the ground in liaison with the relevant landowners. Once the new rights have commenced Suffolk County Council will take on the ongoing management and maintenance of the trail supported by a grant contribution by Natural England. It is a requirement of our support that their management of the trail and its associated infrastructure and signs conform to the published quality standards for all National Trails.</p> <p>Natural England propose a number of measures including restrictions and exclusions to protect sensitive wildlife on this stretch of coast. The restrictions relating to Coastal Access Report FFB2 are detailed in section 2.2.7 “Measures to protect the environment.”</p> <p>Natural England’s Coastal Access duty under the 2009 Act only extends to securing a route and associated margin of land for the public to enjoy on foot. We have no powers under the act to address disturbance caused by low flying aircraft.</p> <p>Relevant appended documents (see Section 6): N/A</p>

Representation ID:	MCA/FFB2/R/1/FFB0471
Organisation/ person making representation:	[Redacted]
Name of site:	Martlesham Creek
Report map reference:	FFB 2b
Route sections on or adjacent to the land:	FFB-2-S015 to FFB-2-S038
Other reports within stretch to which this representation also relates	[Redacted] has also submitted one other representation for this chapter
Summary of representation:	
<p>The map FFB 2b is insufficiently detailed to make it clear how the proposed path will relate to this bank. I am concerned that the proposed path will be on the landward side of the bank and the bank will obscure all views of the river. This has the potential to make the path rather unpleasant with a feeling of walking in a “trench” between the bank and a hedge. Surely the aim of creating a “Coastal Footpath” was to provide views of the coastal area</p> <p>I am aware that there is concern to prevent disturbance to wildlife on the river and mudflats but this should not be at the expense of the public being allowed to enjoy the views of the river. After all, what is the point of wildlife if nobody can see it! We need to consider just who will be the people who are allowed to see the wildlife and how they are to be selected.</p>	

<p>I must request that due consideration is given to the preservation of the open views of the river, perhaps by reducing the height of the bank to be no more than 1.3 meters and the top of the bank be prevented from becoming overgrown.</p>	
<p>Natural England's comment:</p> <p>We are sorry that [Redacted] found our proposals unclear. Section 3 of the Overview document published alongside our proposals clarifies that they are comprised of 4 parts which <u>together</u> describe the alignment of the trail. These are an introduction, the proposals narrative, the proposals table and the proposal map. It goes on to explain each part of our proposals to help interested parties understand them.</p> <p>Route section FFB-2-S015 is a new section of path which is set back from the shoreline. Section 2.2.9 of our Report clarifies that it follows an arable field margin. Section 2.3.1 of our report details where we are following the existing PRoW around Martlesham creek, it specifies that Section FFB-2-S023 is on top of the flood wall, then the trail moves behind the flood wall until FFB-2-S035 where the trail joins the sea wall until FFB-2-S038.</p> <p>In delivering our Coastal Access duty Natural England must have regard to the desirability of adhering to the periphery of the coast and providing views of the sea. Our proposals aim to achieve this as far as it is possible and where it is consistent with our other obligations under the act, in particular our obligation to protect sensitive features. Section 2.3.2 of our proposals outline that Natural England considered various combinations of field edge routes seaward of Woodbridge Road. Whilst Natural England recognise that not every trail section we have proposed provides views of the estuary, we concluded that overall the proposed route provided good views when taken as a whole, and struck the best balance in terms of the criteria described in chapter 4 of the approved Coastal Access Scheme.</p> <p>The proposal to reduce the height of the bank is not something Natural England can consider because it would undermine its primary function as a flood defence bank.</p>	
<p>Relevant appended documents (see Section 6): N/A</p>	

Representation ID:	MCA/FFB2/R/3/FFB0449
Organisation/ person making representation:	[Redacted]
Name of site:	Hill Farm Martlesham
Report map reference:	FFB 2a and FFB 2b
Route sections on or adjacent to the land:	Chapter 2
Other reports within stretch to which this representation also relates	[Redacted] has also submitted a representation for FFB6

<p>Summary of representation:</p> <p>I live near the Deben and enjoy its beauty. The population of Martlesham parish is growing and more to come. There has been a knee jerk reaction by some to 'control' access to the Deben by people. But I am adamant that access to the Deben by Martlesham and Kesgrave residents should be maintained. The local county plans give plenty of reference to housing growth but do not make allowance for creating open spaces nor park land. The South of Martlesham and Kegrave has no footpath access – except by road – and is bounded by a long fence. The north is bounded by the main road into Ipswich. The Hill Farm peninsular is all we have.</p> <p>Overall I am pleased that the River Deben is included in the England Coast path.</p> <p>I understand there are concerns of disturbance to birds along the estuary but the conservation bodies have over the years gained extensive powers along most estuaries of East Anglia and in time have become anti-people. At Martlesham I believe the risk of disturbing birds comes second to the mental health of the new population. I've walked the path many times and I might disturb one or two birds but at ground level the SPA is so large that only a fraction gets disturbed by my presence.</p>
<p>Natural England’s comment:</p> <p>Natural England thanks you for your support of the England Coast Path initiative.</p> <p>Natural England agrees that access to nature can bring significant health benefits. Our proposals seek to enable this, and balance increased coastal access with the needs of landowners and managers as well as the overarching requirement to protect key sensitive wildlife features.</p>
<p>Relevant appended documents (see Section 6):</p>

Representation ID:	MCA/FFB2/R/9/FFB0486
Organisation/ person making representation:	[Redacted] and [Redacted]
Name of site:	South of Decoy Pond
Report map reference:	FFB 2a
Route sections on or adjacent to the land:	FFB-2-5007 and FFB-2-5008
Other reports within stretch to which this representation also relates	[Redacted] and [Redacted] representation included another point, detailed above in section 4.
Summary of representation:	

<p>If the footpath as proposed is approved, we request that additional tree and hedgerow planting be undertaken to the north and western side of FFB-2-5007 and FFB-2-5008 in order to screen walkers from Rudd’s Barn, in the interests of privacy.</p>
<p>Natural England’s comment:</p> <p>The proposed path is, at the closest point, approximately 170m seaward of Rudds Barn and separated from it by an arable field. Natural England do not feel that at this distance, the privacy of the residents there will be detrimentally affected by the trail or that further screening will be required.</p> <p>Proposed route sections FFB-2-S007 and FFB-2-S008 run along the edge of arable fields. Cropped land is an excepted under the legislation so the proposed coastal access rights will only apply to the path itself and not to the arable land surrounding it. There will therefore not be any right of access from the trail landward across to Rudds Barn. In addition to this the route will be signed and waymarked to ensure that walkers can follow it with ease.</p> <p>Should the owners of Rudds Barn find that any significant issues arise after the new rights commence, they should liaise with Suffolk County Council to explore any additional management measures that could be introduced to resolve these. They would also be free to erect any signage they feel is necessary to clarify access rights on their land, taking relevant legal advice as necessary.</p>
<p>Relevant appended documents (see Section 6):</p>

Representation ID:	MCA/FFB2/R/24/FFB0107
Organisation/ person making representation:	[Redacted] and [Redacted]
Name of site:	Fishpond Road/ Sandy Lane, Waldringfield
Report map reference:	FFB 2a
Route sections on or adjacent to the land:	FFB-2-S001
Other reports within stretch to which this representation also relates	<p>[Redacted] and [Redacted] representation included another point, detailed above in section 4.</p> <p>[Redacted] and [Redacted] have also submitted a representation relating to the whole stretch.</p>
<p>Summary of representation: (Natural England have numbered the points made in this summarised representation to be able to clearly respond to the points made).</p> <ol style="list-style-type: none"> The proposed path is aligned very close to our house and for the length of our garden. Note: NE’s map erroneously refers to a property called ‘Byways’ in this location. 	

2. The arable field adjacent to our property is frequented by feeding Curlews, and the arable field beyond the end of our garden is similar. The birds generally maintain a considerable distance from the existing PRoW / bridleway.

The number of visiting Curlews varies from year to year but we have counted, on more than one occasion, in excess of fifty Curlews in the adjacent field.

NE's assessment of the predicted impact of the proposed Coast Path does not reflect the significance of the likely impact on this and other species. These fields have been the regular feeding ground for large numbers of Brent geese over the 20 years of our living here. Raptors are also regularly seen working over these Coastal Margin fields, including Marsh Harrier, Kestrel, Buzzard, Barn Owl, Little Owl, Tawny Owl and Sparrowhawk. Herds of Red deer and Fallow deer are also seen in these fields from time to time. House Martins are very active here

3. NE has given grossly inadequate weight to the likely impact on protected wild bird species. Occasionally we have seen trespassers walking (and some cycling) along the farm track adjacent to this property. Feeding Curlews have been disturbed by such intrusion and we have noticed the birds' failure to return for several days, and then only in smaller numbers.
4. At FFB-2-S001, the disadvantage of a loss of habitat for the vulnerable species must - in law- weigh heavily. NE emphasis appears to be to compromise in favour of an unremitting pressure from local walking groups. NE's assessment that the impact on the natural interest would not be significant, is not supported by raw evidence and the experience of those 'on the ground'.
5. Suffolk Wildlife Trust opinion that the impact on wildlife here is 'not of concern', is countered by our local experience of regular sightings and the independent recording of the Waldringfield Wildlife Group, and wider perusal of the 'Whats Up' local newsletter reports of wildlife sightings around the village, and much experience of disturbance by dogs off the lead.
6. The routing at FFB-2-S003 up to and including FB-2-S007 involves a significant diversion from the line of the farm track running North, and it takes the proposed path in a staggered loop to accommodate a clear requirement to satisfy the privacy of the owners of Cross Farm house. NE refers to this extensive dogleg as being required to take the path away from the vulnerable saltings.

It is reasonable and proper to accommodate a requirement for privacy of householders. It is right that the proposed route was diverted by NE for that reason. The proposed diversion from the farm track nevertheless removes walkers from the otherwise Northwards orientation of the farm track when the track runs roughly parallel with the river (and which provides reasonably close and clear views of the river) and takes the path on a dogleg diversion of some significance such that those views are, for considerable periods, no longer available to walkers, and certainly not to those heading away from the river.

This NE balancing act - to preserve the living conditions and privacy of the occupiers of the house and garden at Cross Farm - also tolerates the inconvenience of a lengthy diversion and which also suffers the loss of some relatively close estuary views. The Secretary of State might regard it as an 'interruption'. The diversion also exposes previously unwalked ground and exposes the adjacent hedgerows to walkers and their dogs which are generally unleashed and will often range widely.

7. SCC Highways Department is charged with preparing to provide PRow access towards the river from the site of a future new town on BT's site at Martlesham. This PRow feature relating to predicted future user appears also to have been omitted from the NE report. An early assessment for PRow routing associated with the new town on BT's Martlesham site included an alignment for a PRow with the Cross Farm private drive. Though unconfirmed, a linking of the proposed Coast Path with a PRow at that point seems to be a likely eventuality.

This representation concerns the NE proposed local route from Sandy Lane towards Kyson Point, and it is made without prejudice to the lawfulness or otherwise of NE's preferred route generally around the estuary, and specifically relating to the viability of an existing river ferry crossing.

Please cross-refer to our **separate representation** regarding the Felixstowe Ferry - Bawdsey Coast Path scheme.

Natural England's comment:

1. [Redacted] and [Redacted] house and garden are separated from the proposed path, which in this location follows the edge of an arable field, by a thick, relatively tall, evergreen hedge which provides screening all year. Towards the furthest end of the garden there are also tall evergreen trees which appear to be bordering the hedge. The image below, taken from google maps, demonstrates the scale and screening of the hedge.

The map label "Byeways" doesn't refer to a property, but rather a location. This name appears on the basemap data from Ordnance Survey.

[Image of house redacted]

2. Natural England thanks [Redacted] and [Redacted] for their interest and acknowledges the effort that has been made with these observations.

A Habitats Regulation Assessment (HRA) and a Nature Conservation Assessment (NCA) have been undertaken on our proposals and were published alongside them. They both conclude that our proposed route will not have significant impact on protected species. The HRA covers two Special Protection Area (SPA) bird species (avocet and brent goose), but the NCA in this case was considerably more detailed than is often the case. It discussed other wintering waders and wildfowl, including species such as curlew, and devoted over six pages to the section from Waldringfield to Martlesham (p30-36). Although the fields near to Waldringfield are undoubtedly used by a number of species, evidence from WeBS and other surveys suggest the fields further north towards Martlesham hold greater numbers of birds, and the HRA and NCA therefore spent longer considering the potential impacts at these locations. The authors of both the HRA and NCA had detailed discussion with Suffolk Wildlife Trust staff and those who carry out WeBS counts on the Deben Estuary. Whilst the HRA must assess whether there is an 'adverse effect on the integrity' of the site, the NCA doesn't operate in quite the same way – it considers Sites of Special Scientific Interest (SSSI) and other features of national importance, rather than SPA features of international importance.

3. Natural England acknowledges that there have been cases of curlew disturbance,

<p>however, it is very difficult to prove that the birds were deterred for several days, without knowing the length and frequency of their visits to the field when no disturbance occurs.</p> <ol style="list-style-type: none"> 4. Natural England consulted with external specialists (including Suffolk Wildlife Trust and RSPB) and have taken considerable time and effort conducting a Habitats Regulation Assessment (HRA) and a Nature Conservation Assessment (NCA) and both documents have concluded that our proposed route will not have significant impact on protected species. 5. Most Suffolk villages will have wildlife features of interest, but Suffolk Wildlife Trust and Natural England need to assess such interest at a wider scale, for example interest at a county or national level. When considering the England Coast Path route, Natural England must give most attention to the sites and areas where most bird and wildlife interest is concentrated – for example breeding sites and roost sites. In general, surveys have shown more wader usage of the arable fields further north, towards Martlesham. Natural England therefore spent considerable time and effort ensuring that they chose the least disruptive route in that area. 6. In this location Natural England spent a long-time considering route alignment, this is detailed in section 2.3.2 of Report FFB2. Various combinations of other field edge routes were considered seaward of Woodbridge Road and Natural England concluded that overall, the proposed route provides good views of the estuary and struck the best balance in terms of the criteria described in chapter 4 of the Coastal Access Scheme. 7. Natural England have consulted with Suffolk County Council regarding this point, and Suffolk County Council have clarified that they have not been charged with providing a PRow link between the new Adastral housing development and coast.
<p>Relevant appended documents (see Section 6): N/A</p>

Representation ID:	MCA/FFB2/R/73/FFB0467
Organisation/ person making representation:	[Redacted]
Name of site:	Fishpond Road/ Sandy Lane, Waldringfield
Report map reference:	FFB 2a
Route sections on or adjacent to the land:	FFB-2-S001, FFB-2-S002
Other reports within stretch to which this representation also relates	[Redacted] representation included another point, detailed about in section 4.

<p>Summary of representation:</p> <p>My home is 25 metres from the proposed path. Elderly neighbours abut the path itself. I have concerns for the security and enjoyment of our properties.</p> <p>the path must provide a "safe route" for the walkers. It creates an unsafe environment for residents.</p> <p>The route will channel walkers of all types 24 hours a day from anywhere to the north of Waldringfield to the Maybush pub, with resulting noise and disturbance to residents and wildlife in the borders to the Deben SPA.</p> <p>Previous NE efforts have encouraged workers such as myself to establish rural offices. I have therefore positioned my garden office, of glass and wood construction, at the very end of my garden, backing onto a farmer's field. The Coastal Path now makes this location vulnerable to potential burglary and damage.</p>	
<p>Natural England's comment:</p> <p>We are sorry that [Redacted] feels that the coast path will make him vulnerable to crime, however we can find no evidence to support this view. His home is separated from the path by another property and its garden and, separating this neighbouring property from the path, is a thick, relatively tall, evergreen hedge which provides screening all year.</p> <p>There is an existing PRoW approximately 35 metres from [Redacted] home, to which FFB-2-S001 joins (FFB-1-S075). This existing PRoW already provides a path of access from the Maybush pub in Waldringfield, to the North.</p> <p>No incidences of crime have been brought to our attention in relation to this existing PRoW which suggests the objectors security concerns are more perceived than real. We are also not aware of any increased levels of antisocial behaviour on open sections of the England Coast Path in other parts of the country.</p>	
<p>Relevant appended documents (see Section 6): N/A</p>	

Representation ID:	MCA/FFB2/R/41/FFB0575
Organisation/ person making representation:	[Redacted]
Name of site:	Martlesham Creek
Report map reference:	FFB 2a FFB 2b
Route sections on or adjacent to the land:	FFB-2-S0023 to FFB-2-S038
Other reports within stretch to which this representation also relates	[Redacted] has also submitted representations relating to FFB6 and to the whole stretch

<p>Summary of representation: At the Alde and Ore Community Partnership meeting on 28 January 2021 there was discussion about the Martlesham Creek Footpath dressing and how it would perform when the river wall was 'over topped'. I am still awaiting information from the Martlesham Footpath Officer and when I have this I will send it on to you.</p>
<p>Natural England's comment: Natural England thanks Mr Croydon for this update.</p>
<p>Relevant appended documents (see Section 6): N/A</p>

Representation ID:	MCA/FFB2/R/91/FFB0612
Organisation/ person making representation:	[Redacted] and [Redacted]
Name of site:	Fishpond Road to the southern side of Martlesham Creek
Report map reference:	FFB 2a and FFB 2b
Route sections on or adjacent to the land:	Proposed path, land to seaward of proposed path and saltmarsh between FFB-2-S001 through to FFB-2-S034
Other reports within stretch to which this representation also relates	[Redacted] and Anne [Redacted] representation included another point, detailed in section 4.

Summary of representation:

Our concern is that the proposed route does not pay sufficient regard either to the wildlife of the designated Deben Estuary SPA, SSSI and Ramsar site.

FFB-2-S001 to FFB-2-S016 will be through undisturbed farmland: the high tide roosting area of Curlew and Black-tailed Godwit and hedgerow breeding area of farmland birds including Yellowhammer, Lesser and Common Whitethroat and several finch species. The fields contain a good population of Skylark and Brown Hare. By routing the Coast Path through these fields there is potential for considerable disturbance, especially as there is no requirement for dogs to be kept on leads other than at Howe's Farm. The proposals pay too much regard to the footpath access in an attractive landscape, without regard for wildlife.

The area of saltmarsh between Manor House, Waldringfield and the point opposite Methersgate is wide, quiet and largely undisturbed, and is a feeding ground and roost of large numbers of waders and wildfowl. disturbance will be caused at FFB-2-S009 as the wooded hedgerow belt on the river side of the path is thin. Screening and the requirement for dogs on leads at FFB-2-S010 is pleasing, although willow screens deteriorate rapidly and will require frequent maintenance, and experience shows that 'dogs on leads' signs are largely ignored. wildlife is already under pressure by the increase in use of the River Deben by all-year-round sailors, canoeists and paddleboarders.

the public footpath (15) along the main river wall between Hill Farm and the river will not be part of the Coast Path in order to lessen disturbance to the conservation area and saltmarsh,

however that path will still exist and therefore will be walked. The new path along the inner bank FFB-2-S015 will inevitably cause disturbance in an area that hitherto has been undisturbed.

The coast path through the area between FFB-2-S001 through to FFB-2-S016 will increase significantly disturbance to wildlife. We urge Natural England to examine again the route options and agree to the Fishpond Road – Woodbridge/Waldringfield Road option.

Natural England’s comment:

Natural England conducted a Habitats Regulation Assessment (HRA) and a Nature Conservation Assessment (NCA) which both concluded that our proposed route will not have significant impact on protected species. The HRA covers 2 SPA bird species (avocet and brent goose) and the NCA discusses wintering waders and wildfowl, including species such as curlew, and devoted over six pages to the section from Waldringfield to Martlesham (p30-36). Although the fields near to Waldringfield are undoubtedly used by a number of species, evidence from WeBS and other surveys suggest the fields further north towards Martlesham hold greater numbers of birds, and the HRA and NCA therefore spent longer considering the potential impacts at these locations. The authors of both the HRA and NCA had detailed discussion with Suffolk Wildlife Trust staff and those who carry out WeBS counts on the Deben Estuary. Whilst the HRA must assess whether there is an ‘adverse effect on the integrity’ of the site, the NCA doesn’t operate in quite the same way – it considers SSSIs and other features of national importance, rather than SPA features of international importance. In addition, FFB2 section 2.2.6 on pages 2 and 3 Natural England explain how they have taken account of our environmental protection objectives.

Regarding FFB-2-S009 and FFB-2-S010, this is a complex area in the stretch and very significant time and effort was spent by Natural England assessing the originally planned route north of Cross Farm, which ran past the lagoons then east to the Footpath on the river wall and north to Martlesham. After several weeks (inc. discussion with the Suffolk Wildlife Trust) it was agreed that the best alignment would be to run the route north of the lagoons inland of the seawall. This was because this route avoids the vast majority of the important saltmarsh area, and Natural England concluded that installing a screen at a vulnerable point east of the lagoon would avoid disturbance there.

Natural England felt this was a fair solution to largely avoiding the sensitive saltmarsh area, whilst recognising that the arable fields close to the final route are also used in winter by curlew and black-tailed godwit, among others.

Natural England do not have the ability to extinguish existing PRoW, such as FP15, however by creating a continuous path around the estuary, it is expected that use of FP15 which forms a cul de sac, will be minimal.

Section 2.3.2 of Coastal Access Report 2 Sandy Lane, Waldringfield to Kyson Point, outlines the route options Natural England considered at Waldringfield and explains why Natural England did not propose them. This states that Natural England considered aligning route sections FFB-2-S001 to FFB-2-S0022 along Waldringfield and Woodbridge Road. We asked Suffolk County Council’s Highways Department to assess the safety of this option and they advised that it would be unsafe for walkers due to the volume and speed of traffic, especially in the summer, the presence of sharp bends creating poor visibility and high banks preventing walkers from stepping out of the way of oncoming traffic. Natural England were therefore unable to propose it.

Relevant appended documents (see Section 6):

Representation ID:	MCA/FFB2/R/35/FFB0008
Organisation/ person making representation:	[Redacted], Disabled Ramblers
Name of site:	N/A
Report map reference:	Map FFB 2a Sandy Lane Waldringfield to Hill Farm Map FFB 2b Hill Farm to Martlesham Creek
Route sections on or adjacent to the land:	<ol style="list-style-type: none"> 1. Report FFB 2: All route sections generally 2. Maps FFB 2a and 2b: Route sections FFB-2-S001 to FFB-2-S015 3. Map FFB 2b: Route sections FFB-2-S016, FFB-2-S018 to FFB-2-S022, FFB-2-S029 to FFB-2-S032 and FFB-2-S034
Other reports within stretch to which this representation also relates	The Disabled Ramblers have also submitted generic and detailed comments on FFB1, FFB3, FFB4, FFB5, FFB6
<p>Summary of representation: (Where necessary Natural England have turned bullet points into letters to more clearly address individual points raised)</p> <p><u>Comment 1</u></p> <p>Report FFB 2: All route sections generally</p> <p>The Accessibility statement in Report <i>FFB 2: Sandy Lane, Waldringfield to Kyson Point</i> states:</p> <p><i>2.2.9 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:</i></p> <ul style="list-style-type: none"> • <i>the trail would follow an uneven grass or bare soil path along arable field margins (maps 2a and 2b) sections FFB-2-S001 to FFB-2-S009 and FFB-2-S011 to FFB-2-S015;</i> • <i>the trail surface can become muddy in places along the southern shore of Martlesham Creek (map 2c sections FFB-2-S028 and FFB-2-S033).</i> <p>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. From <i>Sandy Lane, Waldringfield to Kyson Point</i> the terrain is suitable for all-terrain mobility vehicles. 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.</p> <p>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.</p> <p>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</p>	

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**Maps FFB 2a and 2b: Route sections FFB-2-S001 to FFB-2-S015**

Paragraph 2.2.9 of the Report, states

the trail would follow an uneven grass or bare soil path along arable field margins (maps 2a and 2b) sections FFB-2-S001 to FFB-2-S009 and FFB-2-S011 to FFB-2-S015;

The terrain along these route sections is entirely suitable terrain for users of off-road mobility vehicles. It is therefore important the proposed infrastructure is suitable. Within these sections, 3 new field gates are proposed, but will be necessary to place suitable pedestrian gates beside each of these to enable users of mobility vehicles to progress along the route.

A barrier is also proposed at section FFB-2-S010 – this should be suitable for large mobility vehicles to pass through.

Comment 3**Map FFB 2b: Route sections FFB-2-S016, FFB-2-S018 to FFB-2-S022, FFB-2-S029 to FFB-2-S032 and FFB-2-S034**

- a) A footbridge is proposed at section FFB-2-S016. This should be sufficiently wide for use by a large mobility vehicle, and should have ramps, not steps, at either end.
- b) Route sections FFB-2-S018 to FFB-2-S022 include an existing barrier and footbridge. These should both be reassessed and replaced if they are not suitable to allow progress along the route for a user of a large all-terrain mobility vehicle. The footbridge should have ramps at either end, not steps.
- c) The 3 existing barriers between sections FFB-2-S029 and FFB-2-S032 should be reassessed and replaced if they prevent progress along the route to a user of a large all-terrain mobility vehicle.
- d) The existing footbridge at FFB-2-S034 should be reassessed and replaced if it does not

allow progress along the route for a user of a large all-terrain mobility vehicle; it should have ramps at either end, not steps.

Comment 4

Map FFB 2c: Route sections FFB-2-S022 to FFB-2-S027 (same barriers and footbridge as Map FFB 2b, but with different numbering - confusing)

- Paragraph 2.2.9 of the Report, states
 - *the trail surface can become muddy in places along the southern shore of Martlesham Creek (map 2c sections FFB-2-S028 and FFB-2-S033).*
 - Whilst this may be the case at times, there will be other times when the terrain is suitable for a user of an all-terrain mobility vehicle.
- The 3 existing barriers between sections FFB-2-S022 to FFB-2-S024 should be reassessed and replaced if they prevent progress along the route to a user of a large all-terrain mobility vehicle.
- The existing footbridge at FFB-2-S027 should be reassessed and replaced if it does not allow progress along the route for a user of a large all-terrain mobility vehicle; it should have ramps at either end, not steps

Natural England’s comment:

Comment 1

Natural England welcomes the Disabled Ramblers comments regarding infrastructure that may present as a barrier to many users of the England Coast Path. Natural England will work with Suffolk County Council as the access authority who have responsibility for establishing and maintaining the trail to ensure all users are considered and structures and surfacing meets all necessary legislation, including that designed to protect wildlife and the protection of the flood defence systems.

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 Natural England follow the principles set out in our publication “By All Reasonable Means” to make the trail as easy to use as Natural England reasonably can for disabled people and others with reduced mobility, whilst accepting that such opportunities will often be constrained by practical limitations, such as the rugged nature of the terrain or the availability of visitor transport and facilities.

An important element of equality law is that the needs of those with constrained or restricted mobility are considered throughout the planning, design and implementation processes, and that they are not simply treated as an ‘add on’. Natural England have endeavoured to achieve this as they have developed our proposals for the Bawdsey to Aldeburgh stretch, and, if our proposals are approved, will continue to do so through the implementation phase, working alongside Suffolk County Council, which shares the same responsibilities and duties.

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

Natural England also note the Disabled Ramblers advice regarding the larger mobility vehicles and will ensure this is considered.

Where the disabled ramblers have referred to map 2c in this comment we have assumed that they are referring to map FFB 2b. Please see comment 4 for more details.

Comment 2

Natural England thank the Disabled Ramblers’ pertinent advice regarding the larger/ all-terrain mobility vehicles, and their advice that they can be used on FFB-2-S001 to FFB-2-S009 and FFB-2-S011 to FFB-2-S015 which were previously thought inaccessible and now understand that these sections lend themselves to use by such vehicles. In particular, Natural England propose to work with Suffolk County Council to ensure that proposed field gates include a suitable pedestrian gate beside it to accommodate large mobility vehicles.

The barrier at section FFB-2-S010 is screening, detailed in 2.2.7 of the report, to prevent disturbance of birds in the adjacent saltmarsh and we will not therefore make it suitable for a large mobility vehicle to pass through as this would compromise it’s essential function as a screen.

Comment 3

- a) Natural England propose to work with Suffolk County Council to ensure that new structures such as this bridge can accommodate as wide a range of different abilities as possible within the constraints of the surrounding terrain.
- b) The barrier mentioned here is a post and rail fence and has been noted as it will have a waymarker attached to it. This fence doesn’t block the trail
- c) The three barriers mentioned here are post and rail fencing and have been noted as they will have waymarkers attached to them to ensure that walkers are clearly signposted through the marina. This fencing doesn’t block the trail
- d) Natural England have already made plans with Suffolk County Council to widen the existing sleeper bridge in this location and endeavour to accommodate an all-terrain mobility vehicle.

Comment 4

Natural England apologises for any confusion caused. Map FFB 2c was added to our report in error. This report has now been updated and the correct version is available on our website. Map FFB 2b is the correct map (noted in comment 3).

**Relevant appended documents (see Section 6):
Man Made Barriers and Least restrictive Access**

Representation ID:	MCA/FFB2/R/62/FFB0627
Organisation/ person making representation:	[Redacted] Suffolk Wildlife Trust
Name of site:	
Report map reference:	FFB2 Map FFB2a

<p>Route sections on or adjacent to the land:</p>	<p>FFB2-S010</p>
<p>Other reports within stretch to which this representation also relates</p>	
<p>Summary of representation:</p> <p>At section FFB – S010 This area is important to a number of birds as summarised by Mason, Excell and Meyer (2014); ‘This section has developed in importance since the river wall was breached and the area at TM 277460 has become flooded. There is always water present even when the tide is out.’ They go on to say that ‘It has developed so much that it must remain free from human disturbance.’ Whilst mitigation in the form of screening planting and signs denoting that dogs are to be kept on leads are proposed, we do not believe that this is sufficient to prevent disturbance. This section is known to contain good populations of redshank (Mason, Excell and Meyer, 2014), one of the designated features for the Deben Estuary SSSI and, as the Nature Conservation Assessment for Coastal Access Proposals between Felixstowe Ferry and Bawdsey notes, Mason, Excell and Meyer regard it as ‘perhaps the most important wader species on the Deben estuary’. They also note that ‘the saltmarsh may have loafing Brent Geese.’ Dark-bellied brent geese are a feature of the Deben Estuary SPA and Ramsar site and so proposals that result in the negative impact upon the SPA and Ramsar should not be permitted. his section also contains other waders including grey plover, dunlin, black-tailed godwit and turnstone as well as wigeon, teal, gadwall and pintail.</p> <p>we recommend that an alternative route is proposed that avoids the disturbing this important section and instead travels inland and bypasses the lagoons and saltmarsh before re-joining the path at a later stage. This would then avoid the coastal path having a negative impact upon the Deben Estuary SPA, Ramsar and SSSI.</p>	
<p>Natural England’s comment:</p> <p>During last autumn, very significant time and effort was spent by Natural England assessing the originally planned route north of Cross Farm, which ran past the lagoons then east to the FP on the river wall and north to Martlesham. After several weeks (inc. contact with Nick Mason and Andrew Excell, Suffolk Wildlife Trust) it was agreed to run the route north of the lagoons inland of the seawall, despite probable concern from the landowner. This route avoids the vast majority of the important saltmarsh area, with the one vulnerable point (east of the lagoon) to be screened.</p> <p>Natural England felt this was a fair solution to largely avoiding the sensitive saltmarsh area, whilst recognising that the arable fields close to the final route are also used in winter by curlew and black-tailed godwit, among others. Natural England understood that Nick Mason and Andrew Excell were pleased that this route had been chosen, rather than following the river wall.</p> <p>Bearing in mind the principle that the England Coast Path route should be as close as possible to the coast, and the ‘least restrictive option’ should be chosen, Natural England believe the chosen route does not put the designated features at risk. The screen by the lagoons will be regularly checked and maintained/repared as necessary. Should new information come to light, or circumstances change, then the England Coast Path route and restrictions can be reviewed in the future.</p>	

Relevant appended documents (see Section 6):

Mason, N., Excell, A. and Meyer, J., 2014. The Deben Estuary and its hinterland: Evaluation of key areas for birds, recreational disturbance issues and opportunities for mitigation and enhancement. (Appendix B)

Natural England, December 2020. England Coast Path, Felixstowe Ferry to Bawdsey Nature Conservation Assessment. (Appendix C)

Representation ID:	MCA/FFB3/R/36/FFB0008
Organisation/ person making representation:	The Disabled Ramblers
Name of site:	All route sections in relation to comment 1 and Kyson Point in relation to comment 2.
Report map reference:	Report FFB 3: Kyson Point to Wilford Bridge <ul style="list-style-type: none"> • Map FFB 3a Kyson Point to The Avenue, Woodbridge • Map FFB 3b The Avenue, Woodbridge to Spring Farm Sewage Works • Map FFB 3c Spring Farm Sewage Works to Wilford Bridge
Route sections on or adjacent to the land:	Report FFB 3: All route sections generally Map FFB 3a: Route sections FFB-3-S001 and FFB-3-S002
Other reports within stretch to which this representation also relates	None

Summary of representation:

Comment 1
Report FFB 3: All route sections generally
The Accessibility statement in Report FFB 3 states:
3.2.8 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 be subject to tidal flooding at times at Kyson Point (map 3a section FFB-3-S002);*
- *The trail would follow an uneven gravel path in places along the seawall such as near to Kyson Hill (map 3a sections FFB-3-S005 and FFB-3-S006).*

The Disabled Ramblers is concerned that Natural England has not recognised that there is a increasing number of people with reduced mobility who use all-terrain mobility scooters and other mobility vehicles to enjoy routes on rugged terrain in the countryside, including uneven grass, bare soil or rocky paths, foreshore areas and some sea walls and beaches. Slopes of 1:4, obstacles 6” high, water to a depth of 8” are all challenges that users of all-terrain mobility scooters are used to managing. Modern batteries are now available that allow a range of up to 60 miles on one charge. 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 route of the England Coast Path that walkers have. Suitability of all structures should be considered with the assumption that a person with reduced mobility will be going out without more-mobile helpers, so will need to operate the structure on their own, seated on their mobility vehicle. Man-made infrastructure should not be a barrier to access.

Disabled Ramblers requests

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

Comment 2

Map FFB 3a: Route sections FFB-3-S001 and FFB-3-S002

The existing barrier between sections FFB-3-S001 and FFB-3-S002 should be reassessed and replaced if it prevents progress along the route to a user of a large all-terrain mobility vehicle.

Natural England's comment:

Comment 1

Natural England welcomes the Disabled Ramblers comments regarding infrastructure that may present as a barrier to many users of the England Coast Path. We will work with Suffolk County Council as the access authority who have responsibility for establishing and maintaining the trail to ensure all users are considered and structures and surfacing meets all necessary legislation, including that designed to protect wildlife and the protection of the flood defence systems.

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

An important element of equality law is that the needs of those with constrained or restricted mobility are considered throughout the planning, design and implementation processes, and that they are not simply treated as an 'add on'. We have endeavoured to achieve this as we have developed our proposals for the Felixstowe Ferry to Bawdsey stretch, and, if our proposals are approved, will continue to do so through the implementation phase, working alongside Suffolk County Council, which shares the same responsibilities and duties.

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

We also note the Disabled Ramblers advice regarding the larger mobility vehicles and will ensure this is considered.

Comment 2

The existing barrier shown on Map 3a between FFB-3-S001 and FFB-3-S002 is a post and rail fence that sits adjacent to the proposed route, demarking private land. It does not block the route. It has been mapped in this instance as we propose to attach a waymarker to it. Natural England apologises for any confusion that this label on the map has caused.

Relevant appended documents (see Section 6):

Please see A) “Man-made barriers and least restrictive access”

Representation ID:	MCA/FFB3/R/90/FFB0513
Organisation/ person making representation:	[Redacted], for Melton Parish Council
Name of site:	Parish of Melton
Report map reference:	Report FFB 3: Kyson Point to Wilford Bridge Map FFB 3b and FFB 3c
Route sections on or adjacent to the land:	FFB-3-S011FP to FFB-3-S068 FP
Other reports within stretch to which this representation also relates	None

Summary of representation:

Melton Parish Council supports the improved coastal access represented by this plan but councillors are concerned about the increasingly heavy use of the coastal path through Melton and designated sites like Melton picnic site county wildlife site. The report states that the coastal environment along this stretch of coast is unlikely to be sensitive to access improvements (para 3.2.b). However that is not the experience of the councillors and mitigations may be required.

Natural England’s comment:

We thank Melton Parish Council for their support for the improved coastal access that this report proposes.

The representation refers to para 3.2.b of our Coastal Access Report, however we assume this is an error and it should read para 3.2.6 where we state:

“We consider that the coastal environment along this length of coast is unlikely to be sensitive to the improvements to coastal access envisaged and that no special measures are needed in respect of our proposals.”

A full assessment of any potential impacts on wildlife and habitats was undertaken as part of the preparation of our proposals including thorough discussion with organisations with relevant local knowledge. The results of this are detailed in the Nature Conservation Assessment which was published and publicly available on gov.uk at the same time as the proposals for Felixstowe Ferry to Bawdsey. Section D4 covers the coastline from Kyson Point to Wilford Bridge and includes consideration of county wildlife sites such as Melton Picnic site. Key aspects of the alignment that are highlighted are:

- that the proposed route follows existing PRoW, apart from three small sections which follow currently walked routes
- that the route is already heavily used because it is situated along the front of the town of Woodbridge and that any affects resulting from establishment of the England Coast Path are expected to be negligible in relation to existing use
- that under our proposals, no new access rights to saltmarsh and mudflat would be established, because a section 25A restriction has been proposed on coastal access rights on saltmarsh and mudflats seaward of the route. No impact on nature conservation features from new coastal access rights would therefore be expected here.

In relation to Melton Picnic site it is noted that the site is approximately 15 metres to landward of the proposed trail alignment, which is on the seawall, so the entire site will be outside the coastal margin

For these reasons we expect there to be no appreciable ill-effects resulting from our proposals.

Melton Parish Council have expressed a general concern that mitigations may be required but have not identified any specific areas of concern. If however specific concerns arise after the commencement of the new coastal access rights, we would be happy to work with them to identify how best they can be addressed.

Relevant appended documents (see Section 6):

6. Supporting documents

Appendix A - Relating to the Disabled Ramblers Representations (FFB2 & FFB3)



Disabled Ramblers Ltd
Company registered in England Number 05030316
Registered Office: 7 Drury Lane, Hunsdon, Ware, Herts SG12 8NU

<https://disabledramblers.co.uk>

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-for-2-way-gate/2-way-gate/> One-way opening gates need more manoeuvring space than two-way and some mobility vehicles may need a three metre diameter space to manoeuvre around a one-way gate. The minimum clear width of pedestrian gates should be 1.1metres (BS 5709:2018).

Field gates

Field gates (sometimes used across 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-2-in-1/in-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

Appendix B – relating to Suffolk Wildlife Trust representation

The Deben Estuary and its hinterland: Evaluation of key areas for birds, recreational disturbance issues and opportunities for mitigation and enhancement Nick Mason, Andrew Excell & James Meyer 2014

[Microsoft Word - Deben Bird Report Low Res \(wordpress.com\)](#)

Appendix C – relating to Suffolk Wildlife Trust representation

Natural England, December 2020. England Coast Path, Felixstowe Ferry to Bawdsey Nature Conservation Assessment.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/941391/felixstowe-ferry-bawdsey-nature-conservation-assessment.PDF