

# Proposed changes to the King Charles III England Coast Path in Suffolk at Corton and Dunwich Heath

Natural England's Variation Report to the Secretary of State

Coastal Access Variation Report VR21  
October 2024

## Part 1: Purpose of this report

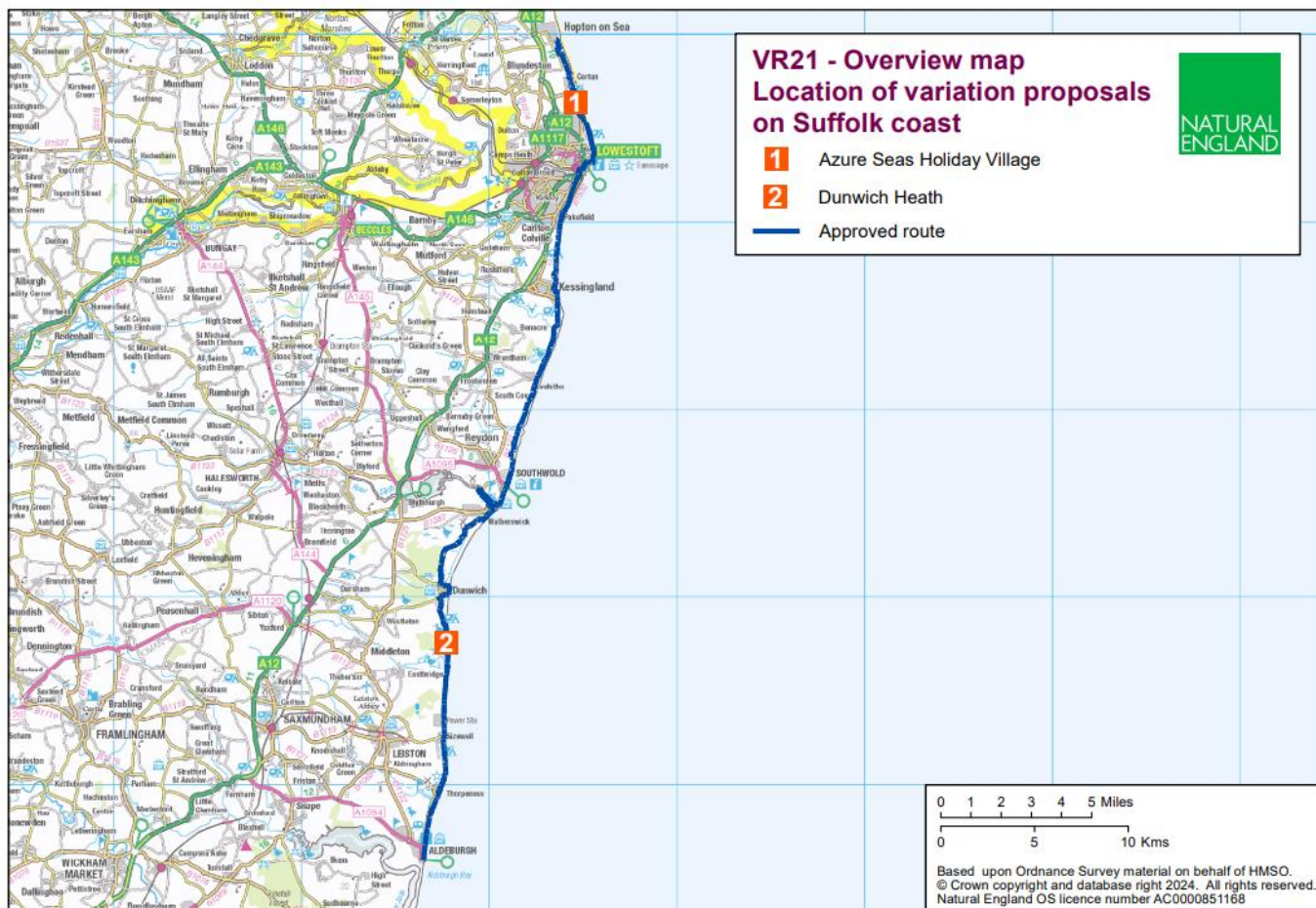
1.1 Natural England has a statutory duty under the Marine and Coastal Access Act 2009 to improve access to the English coast. The duty is in two parts: one relating to securing a long-distance walking route around the coast; the other to creating an associated "margin" of land for the public to enjoy, either in conjunction with their access along the route line, or otherwise.

1.2 On 23 June 2022 the Secretary of State approved Natural England's proposals relating to **AHS 2: Sizewell to Dunwich** and **AHS 6: Lowestoft to Hopton-on-Sea** which formed part of our proposals for the Aldeburgh to Hopton-on-Sea stretch [King Charles III England Coast Path: Aldeburgh to Hopton-on-Sea - GOV.UK \(www.gov.uk\)](http://www.gov.uk). Whilst the proposals have been approved, Natural England and Suffolk County Council are currently working to prepare the trail for public use and as such the coastal access rights for this stretch have yet to commence.

1.3 Since the approval of the report, it has become clear that two changes are necessary to the route of the King Charles III England Coast Path. This report contains Natural England's proposals relating to changes at Azure Seas Holiday Village in Corton, and Dunwich Cliffs which are at the locations shown on the Variation Location Map below.

1.4 In order for these proposed changes to come into force they must be approved by the Secretary of State.

1.5 The original stretch [Overview](#) provides vital context to the proposals set out in this Variation Report.



## Part 2: Proposed variation at Azure Seas Holiday Village

**Start Point:** Grid reference: TM 5465 9635

**End Point:** Grid reference: TM 5461 9648

**Relevant Original Proposal Map:** AHS 6a

### 2.1 Introduction

#### Reason for variation:

2.1.1 The approved alignment at the Azure Seas Holiday Village had been proposed with the landowner's agreement. It is mainly on an existing walked route (AHS-6-S010) promoted to site users as a path to the beach. Pre-establishment survey work by the local authority however found that the southern entrance to the approved alignment was blocked. It was then discovered that a group of new holiday lodges had been built in the area of the approved alignment. One lodge has been built across the approved alignment. (See Map VR21a). The Azure Seas site has been sold since discussions with the original owners.

## Proposed variation:

2.1.2 After construction of the new lodges the new site owners created and maintain a new route inside the boundary of the site which continues to provide access to the beach for people staying at the Village.

2.1.3 The landowners support using their new route as the varied alignment.

2.1.4 The proposed variation (see Map VR21b) is for the route, on leaving Gunton Warren to cross Tramps Alley by turning landward towards the south-western corner of the Azure Seas site, close to Corton Road (B1385). It then turns north, through a boundary gate on to the existing path that has been created. It is close to, and within the landward boundary of the Holiday Village and is fenced on the landward side so walkers are separated from the adjacent road. It is also fenced on the seaward side to maintain privacy for lodges within the site.

2.1.5 The approved route and proposed variation are both through woodland. The variation route is closer to Corton Road, but traffic levels are low and a hedge between the path and the road further reduces any impact. Neither route gives views of the sea.

2.1.6 The proposed route is on the landward edge of the Holiday Village ownership. The seaward spreading room, within the caravan park will be unchanged because caravan parks are excepted land, without coastal access rights except for an access strip, which has been created for this route. The landward fence marks the landward extent of the access strip.

## Considering the options:

2.1.7 Options at Azure Sea Holiday Park, which might now be considered for the variation, were considered within the original proposals:

- Option 1 – to align the trail alongside Corton Road (B1385) landward of the Azure Seas boundary. There is no pavement on the seaward side of the road but there is an asphalt pavement on the landward side. Further north the landward pavement is the approved route (AHS-6-S015 to AHS-6-S024). This option would add 690m of roadside walking.
- Option 2 – to align the trail along the base of the cliffs through Corton on a seawall. This option was not proposed as the seawall is sometimes buried in sediment and subject to frequent local closures. It is also subject to sea spray or inundation at high tides. The seawall and access points to it would remain available for people to use as part of the spreading room.

In addition:

- Option 3 – to align the trail along the clifftop was not possible due to the position of holiday lodges.
- Option 4 – a route through the Azure Seas site. The approved route was signposted and promoted by the owners as a route to the beach. They have created a new route, still through woodland, inside the Village boundary. It avoids the new lodges and does not impact on the users of the lodges. There is no significant change to the walking experience. The owners and the access authority support this route for the alignment for the variation. It is the best viable trail option remaining and so we have proposed it in this variation report.

## 2.2 Proposals Narrative

### The Trail:

2.2.1 The proposed variation to the approved trail:

- would leave the northern boundary of Gunton Warren at the approved route AHS-6-S006,
- is aligned on the landward edge of Azure Seas Holiday Village within the same ownership as the approved route and rejoins the approved route near the northern end of the site (AHS-6-S011),
- follows existing walked routes.
- is fenced on the landward side which keeps walkers off the road,
- for most of its length is within woodland,
- has a good surface - AHS-VR21-S001 is on an asphalt track and for most of the route the surface is compacted soil (AHS-VR21-S002),
- is like the approved route as there are no views of the sea, and
- is a maximum of 48m inland of the approved route and is 144 metres long. The approved route is 178m long.

### Protection of the environment:

2.2.2 The section of trail affected by this variation passes through woodland. The approved route and proposed variation are both landward of the Corton Cliffs Site of Special Scientific Interest. There are no heritage designations present in this area (see Map VR21c).

### Accessibility:

- The path surface is compacted soil and is level, avoiding a slope on the approved route,
- it is very similar to the approved alignment in woodland and so is unlikely to have additional issues for people with reduced mobility.

### Where we have proposed exercising statutory discretions:

2.2.3 **Landward boundary of the coastal margin:** We have used our discretion on one section of the varied route to map the landward extent of the coastal margin to an adjacent physical boundary of the fence line to make the extent of the new access rights clearer. This matches existing permissive access rights.

2.2.4 The Proposals Tables show where we are proposing to alter the default landward boundary of the coastal margin. These proposals are set out in columns 5b and 5c of table 2.3.1.

**See part 3 of the Overview to the original report - 'Understanding the proposals and accompanying maps', for an explanation of the default extent of the coastal margin and how we may use our discretion to adjust the margin, either to add land or to provide clarity.**

**2.2.5 Restrictions and/or exclusions:** Access rights to the seaward margin would be subject to the excepted land rules and the national restrictions on coastal access rights. We do not propose any additional local restrictions or exclusions.

**2.2.6 Coastal erosion:** 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. This would happen in accordance with the criteria and procedures for 'roll-back' set out in part 7 of the Overview.

Natural England may only propose the use of this roll-back power:

- as a result of coastal erosion or other geomorphological processes or encroachment by the sea, or
- in order to link with other parts of the route that need to roll back in direct response to such changes.

**2.2.7** Column 4 of tables 2.3.1 and 2.3.2 indicates where the roll-back power has been proposed in relation to a newly proposed route section. Where this is the case, the route, as initially determined at the time this report was prepared, is to be at the centre of the line shown on maps AHS 6a as the proposed route of the trail.

**2.2.8** If at any time in the future any part of a route section upon which roll-back has been specified needs, in Natural England's view, to change in order for the overall route to remain viable, the new route for the part in question will be determined by Natural England without further reference to the Secretary of State. This will be done in accordance with the criteria and procedures described under the title 'Roll-back' in part 7 of the Overview and section 4.10 of the Coastal Access Scheme. If this happens, the new route will become the approved route for that section for the purposes of the Order which determines where coastal access rights apply.

### **Establishment of the trail:**

**2.2.9** The variation will require signage, but only relocation of signage that had been specified for the approved route. It does not though need a new gate at the site boundary, which was proposed on the approved route, as a gate is already in place. The proposed variation route is therefore cheaper than the approved route.

**2.2.10** If the Secretary of State approves our report, Suffolk County Council will liaise with the affected landowners about relevant aspects of the establishment works and installation of new signs that are needed on their land. Prior to works being carried out on the ground, all necessary permissions, authorisations and consents will be obtained. All such works would conform to the published standards for National Trails and the other criteria described in our Coastal Access Scheme.

### **Maintenance of the trail:**

**2.2.11** Ongoing maintenance of the varied sections of trail would be necessary from time to time. This variation would make no significant change to the annual costs associated with maintaining the approved route as set out in our original report.

## Part 2.3: Proposals Tables

See Part 3 of Overview for guidance on reading and understanding the tables below.

**Table 2.3.1: Map AHS 6a – Links Road Lowestoft to Corton Woods**

Key notes on table:

1. Column 4 – ‘No’ means no roll-back is proposed for this route section. ‘Yes – normal’ means roll-back is proposed and is likely to follow the current feature (e.g. cliff edge/beach) for the foreseeable future as any coastal change occurs.
2. Column 4 – ‘Yes – see table 2.3.2’ means roll-back is proposed but refer to that table below about our likely approach to implementing it for this route section. This is because a more complex situation exists in this case and consideration must be given to how roll-back may happen in relation to excepted land, a protected site etc.
3. Column 5a - 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. The relevant land type (foreshore, cliff, bank, barrier, dune, beach, flat or section 15 land – see Glossary in Annex B to the 2017 Overview) is shown in this column where appropriate. “No” means none present on this route section.
4. Columns 5b and 5c – Any entry in these columns means we are proposing to align the landward boundary of the coastal margin on this route section with the physical feature(s) shown in 5b, for the reason in 5c. No text here means that for this route section the landward edge of the margin would be that of the trail itself - or if any default coastal land type is shown in 5a, that would be its landward boundary instead.

1	2	3	4	5a	5b	5c	6
Map(s)	New route section number(s)	Current status of route section(s)	Roll-back proposed? (See part 8 of 2020 report Overview)	Landward margin contains coastal land type?	Proposal to specify landward boundary of margin	Reason for landward boundary proposal	Explanatory notes
AHS 6a/VR21b	AHS-VR21-S001	Public highway	Yes – see table 2.3.2	No	Landward edge of pavement	clarity and cohesion	
AHS 6a/VR21b	AHS-VR21-S002	Other existing walked route	Yes – see table 2.3.2	No	Hedge/ fence	clarity and cohesion	

### 2.3.2 Roll-back implementation – more complex situations: Map AHS 6a – Links Road Lowestoft to Corton Woods

Map(s)	New route section number(s)	Feature(s) or site(s) potentially affected	Our likely approach to roll-back
AHS 6a	AHS-VR21-S001 to AHS-VR21-S002	Corton Road and Pleasurewood Hills Park and pond	<p>If it is no longer possible to find a viable route seaward of the road, pond, or holiday park, we will choose a new route after detailed discussions with all relevant interests, either (a) to pass through the site, or (b) if this is not practicable, to pass somewhere on the landward side of it.</p> <p>In reaching this judgement we will have full regard to the need to seek a fair balance between the interests of potentially affected owners and occupiers and those of the public.</p>

## Part 3: Proposed variation at Coastguard Cottages, Dunwich Heath

**Start Point:**                      **Grid reference: TM 47749 67603**

**End Point:**                      **Grid reference: TM 47751 67624**

**Relevant Original Proposal Map: AHS Map 2c**

### 3.1 Introduction

#### Reason for variation:

3.1.1 Sections AHS-2-S018 and AHS-2-S019 will be re-surfaced with stone aggregate as part of establishment works, and equipment/materials will be brought to site along a 22-metre length of public footpath that is currently unused because of vegetation growth. The works will require the clearance of the vegetation and it is proposed to then retain the cleared public footpath as the route variation, creating step-free access.

#### Proposed variation:

3.1.2 The approved alignment is on an existing walked route. See sections AHS-2-S020 to S022 (part) in Report 2. It starts on top of a low bank from AHS-2-S019 and continues onto a short set of steps off the seaward side of the bank onto AHS-2-S020. The ground surface is compacted shingle.

3.1.3 The varied route would be aligned onto 22 metres of a public footpath that is currently unused, and which continues in a straight line from AHS-2-S019, on top of the bank to join onto the rising ground of section AHS-2-S022. We anticipate that surface improvements to AHS-2-S019 would also continue onto the varied section.

3.1.4 The landowners support using the new route as the varied alignment, being a more direct and accessible route, which will be more intuitive for walkers. The landowners would remove the set of steps.

3.1.5 As a consequence of this proposed change, all land seaward of the trail would become part of the coastal margin. This would create an increase of approximately 140m<sup>2</sup> in the amount of margin, on the seaward side of the vegetated bank however most of it is heathland, that is already subject to Open Access rights under Part 1 of the Countryside and Rights of Way Act 2000.

#### Considering the options:

3.1.6 We have worked closely with the access authority and have also held discussions with representatives of the landowner.

3.1.7 Below we set out the alignment options that we considered:

- Option 1 – to retain the approved alignment, which is a less-direct route. This would retain the set of steps which reduce accessibility and have a higher requirement for maintenance.
- Option 2 – to take advantage of the opportunity created through adjacent establishment work. This option, is more direct, removes a set of steps from the KCIIIIECP in this area and improves accessibility, and so we have proposed it in this variation report.



## 3.2 Proposals Narrative

### The Trail:

3.2.1 The proposed variation to the approved trail:

- is formed of 22m of public footpath that is available after clearance of vegetation.
- extends northward at a maximum of 8 metres west of the approved route and is on higher ground.

### Protection of the environment:

3.2.2 In this part of the report, we explain how we have taken account of environmental protection objectives in developing our proposals to vary the line of the trail.

3.2.3 The section of trail affected by this variation passes through an area of lowland heathland, that has developed young scrub over a public right of way.

3.2.4 The following designated sites are within the limits of this variation proposal:

- Minsmere-Walberswick Heaths and Marshes SSSI
- Minsmere to Walberswick Heaths & Marshes SAC
- Minsmere-Walberswick Ramsar
- Minsmere-Walberswick (SPA)

Map VR21f Key Statutory Environmental Designations - shows the extent of these designated sites in relation to the proposal.

3.2.5 This minor change in route alignment falls within an area covered by the original wildlife assessments in relation to the users of the route. This change will align the Trail along an existing legal right of way that has become scrubbed over within the past ten years. This legal right exists for users outside of the creation of the King Charles III England Coast Path National Trail, and as such there is a baseline of use that has already been accounted for within the original proposals and accompanying HRA. The details and conclusions from the HRA that supported the original alignment have been reviewed and found to be relevant and supportive to this minor variation of alignment.

The small area of extra coastal margin created by the realignment slightly inland of the original proposal is land that is currently covered by Open Access rights, and as such the public's ability to access this land will not be altered. The area of new coastal margin is itself scrubbed over in heath and is generally unattractive for the public to access, so few if any will avail themselves of their right.

The clearing of a width of young scrub may have positive benefits to the lowland heath and associated flora and fauna, creating important edge habitat, allowing low lying vegetation to develop and providing areas for reptiles to sunbathe.

3.2.6 Natural England is satisfied that the proposals for coastal access in this variation report are made in accordance with relevant environmental protection legislation.

## Accessibility:

The new route:

- would be improved to a compacted two metre wide fine-graded aggregate surface
- would be on level ground
- improves accessibility by not using a set of steps down the side of the bank which is included on the approved alignment.

**3.2.7 Restrictions and/or exclusions:** Access rights to the seaward margin would be subject to the excepted land rules and the national restrictions on coastal access rights. We do not propose any additional local restrictions or exclusions.

**3.2.8 Coastal erosion:** 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. This would happen in accordance with the criteria and procedures for 'roll-back' set out in part 7 of the Overview.

Natural England may only propose the use of this roll-back power:

- as a result of coastal erosion or other geomorphological processes or encroachment by the sea, or
- in order to link with other parts of the route that need to roll back in direct response to such changes.

**3.2.9** Column 4 of tables 3.3.1 and 3.3.2 indicates where the roll-back power has been proposed in relation to a newly proposed route section. Where this is the case, the route, as initially determined at the time this report was prepared, is to be at the centre of the line shown on map AHS-VR21e as the proposed route of the trail.

**3.2.10** If at any time in the future any part of a route section upon which roll-back has been specified needs, in Natural England's view, to change in order for the overall route to remain viable, the new route for the part in question will be determined by Natural England without further reference to the Secretary of State. This will be done in accordance with the criteria and procedures described under the title 'Roll-back' in part 7 of the Overview and section 4.10 of the Coastal Access Scheme. If this happens, the new route will become the approved route for that section for the purposes of the Order which determines where coastal access rights apply.

## Establishment of the trail:

**3.2.11** Below we summarise how our proposed route for the repositioned part of the trail would be physically established to make it ready for public use before any new rights come into force along it.

**3.2.12** Our estimate of the capital costs for these works is £2,000. This would have the effect of increasing the overall establishment cost for the Sizewell to Dunwich report by £2,000. This estimate is informed by information from the access authority based on the adjacent surfacing work on AHS-2-S019.

**3.2.13** There is one main element to the overall capital costs:

- resurfacing the reopened public footpath. Clearance of vegetation is not needed as it will have been removed to create access for machinery and materials for adjacent resurfacing work.

3.2.14 If the Secretary of State approves our report, Suffolk County Council will liaise with the affected landowner about relevant aspects of the establishment works and installation of new signs that are needed on their land. Prior to works being carried out on the ground, all necessary permissions, authorisations and consents will be obtained. All such works would conform to the published standards for National Trails and the other criteria described in our Coastal Access Scheme.

### Maintenance of the trail:

3.2.15 Ongoing maintenance of the varied section of trail would be necessary from time to time. The variation route is 7m shorter and so would make no significant change to the annual payment for route maintenance. However actual costs would be less due to not needing to maintain/replace the wooden steps on the approved alignment.

## Part 3.3: Proposals Tables

See Part 3 of Overview for guidance on reading and understanding the tables below

**Table 3.3.1: Map AHS 2c – The Sluice to Dunwich Heath Coastguard Cottages**

Key notes on table:

Column 4 – ‘No’ means no roll-back is proposed for this route section. ‘Yes – normal’ means roll-back is proposed and is likely to follow the current feature (e.g. cliff edge/beach) for the foreseeable future as any coastal change occurs.

Column 4 – ‘Yes – see table 3.3.2’ means roll-back is proposed but refer to that table below about our likely approach to implementing it for this route section. This is because a more complex situation exists in this case and consideration must be given to how roll-back may happen in relation to excepted land, a protected site etc.

Column 5a - 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. The relevant land type (foreshore, cliff, bank, barrier, dune, beach, flat or section 15 land – see Glossary in Annex B to the 2017 Overview) is shown in this column where appropriate. “No” means none present on this route section.

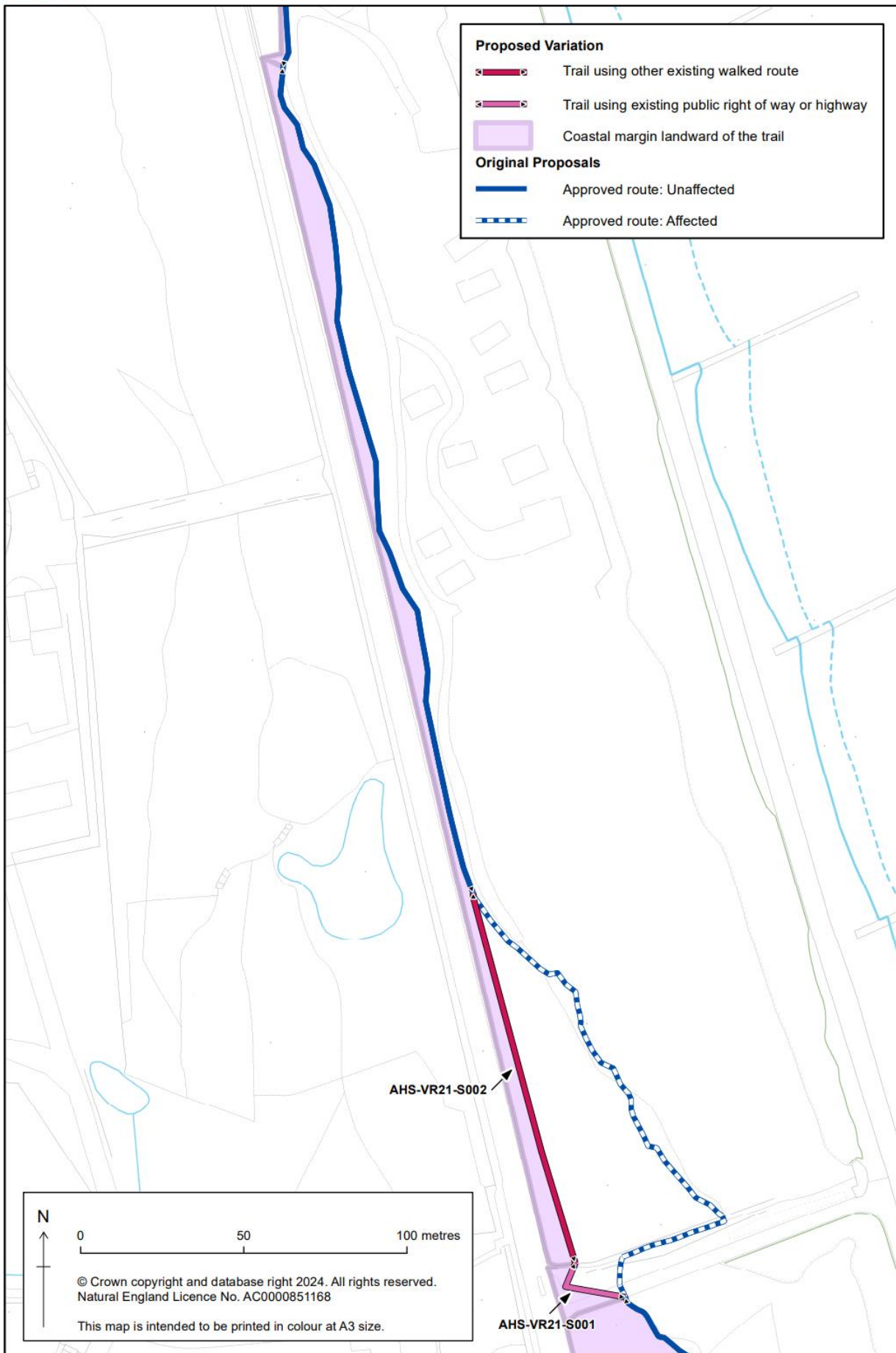
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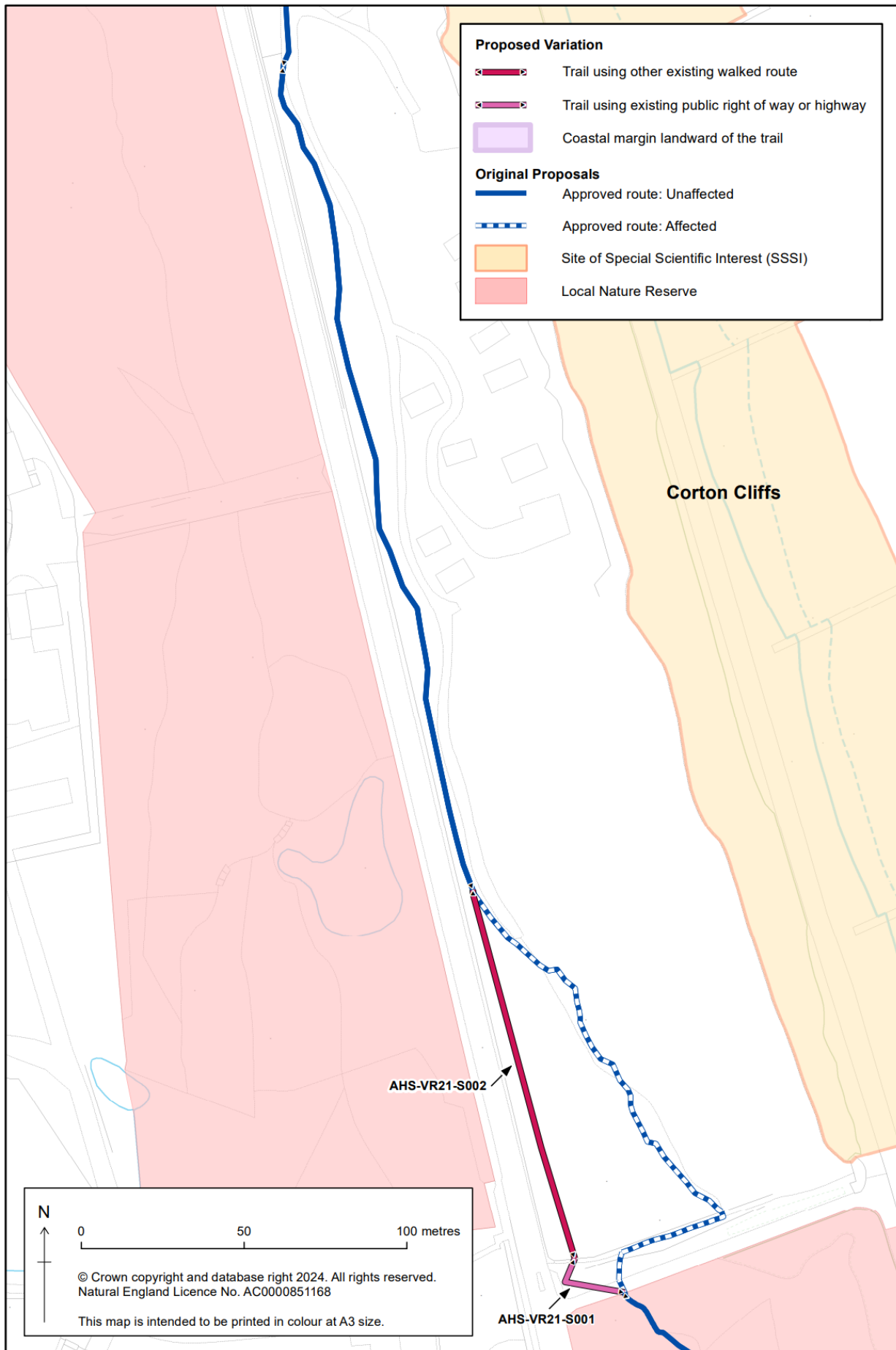
1	2	3	4	5a	5b	5c	6
Map(s)	New route section number(s)	Current status of route section(s)	Roll-back proposed? (See part 8 of 2017 report Overview)	Landward margin contains coastal land type?	Proposal to specify landward boundary of margin	Reason for landward boundary proposal	Explanatory notes
AHS 2c/ VR21e	AHS-VR21-S003	Public footpath	Yes – see table 3.3.2	Yes – bank			This continues the landward boundary of adjacent S019, part of the approved alignment.

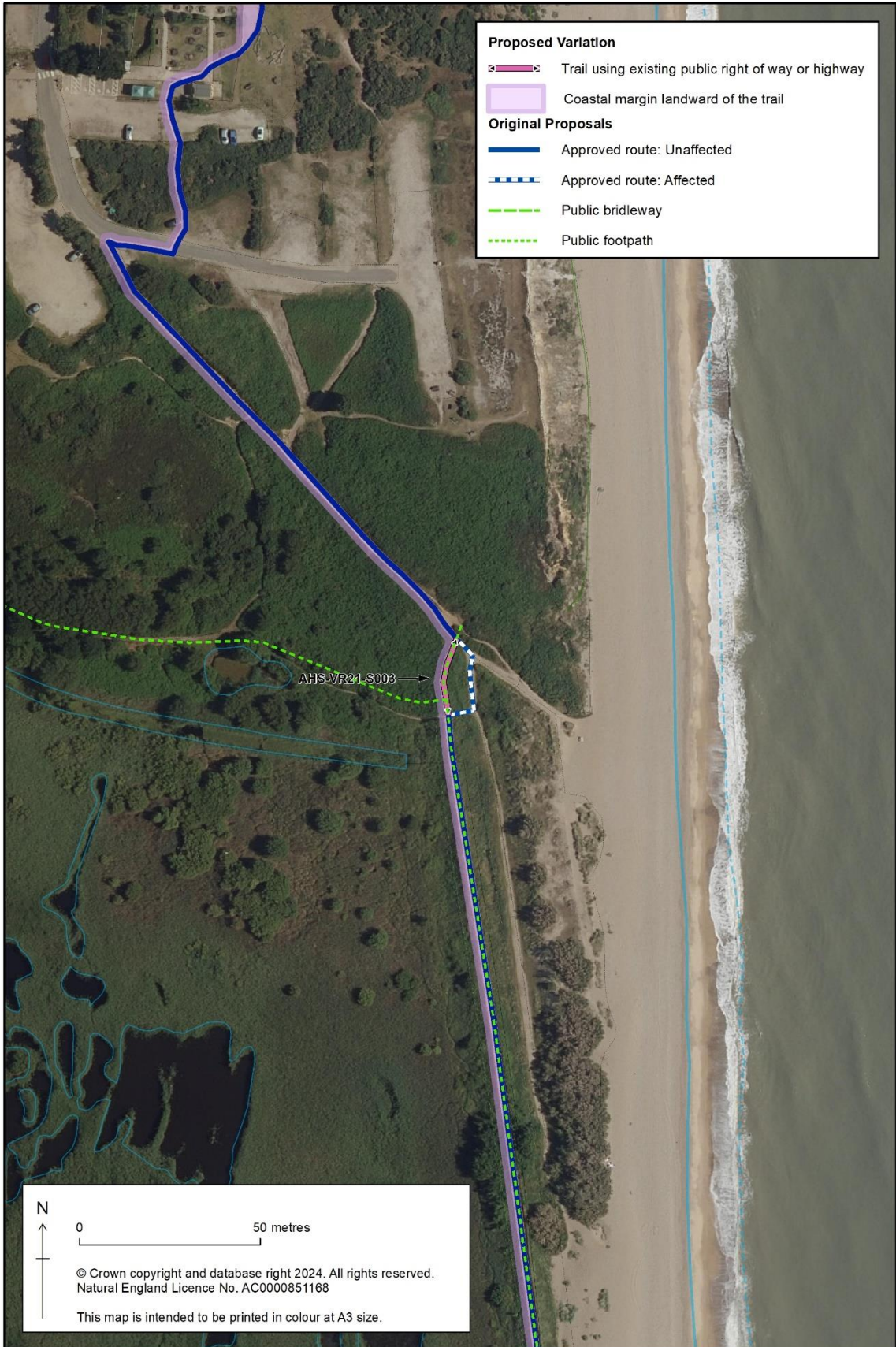
### 3.3.2 Roll-back implementation – more complex situations: Map AHS 2c – The Sluice to Dunwich Heath Coastguard Cottages

Map(s)	New route section number(s)	Feature(s) or site(s) potentially affected	Our likely approach to roll-back
AHS 2c/ VR21e	VR21-S003	<ul style="list-style-type: none"> <li>▪ Minsmere-Walberswick Heaths and Marshes SSSI,</li> <li>▪ Minsmere-Walberswick SPA,</li> <li>▪ Minsmere-Walberswick Heaths and Marshes SAC,</li> <li>▪ Minsmere-Walberswick Ramsar</li> </ul>	<ul style="list-style-type: none"> <li>■ If it is not possible to find a viable route seaward of the designated sites we will choose a new route after detailed discussions with the relevant experts and with any potentially affected owners or occupiers, which will either (a) pass through the site, if appropriate or (b) if necessary, be routed landward of it.</li> <li>■ In reaching this judgement we will have full regard to the need to seek a fair balance between the interests of potentially affected owners and occupiers and those of the public.</li> </ul>



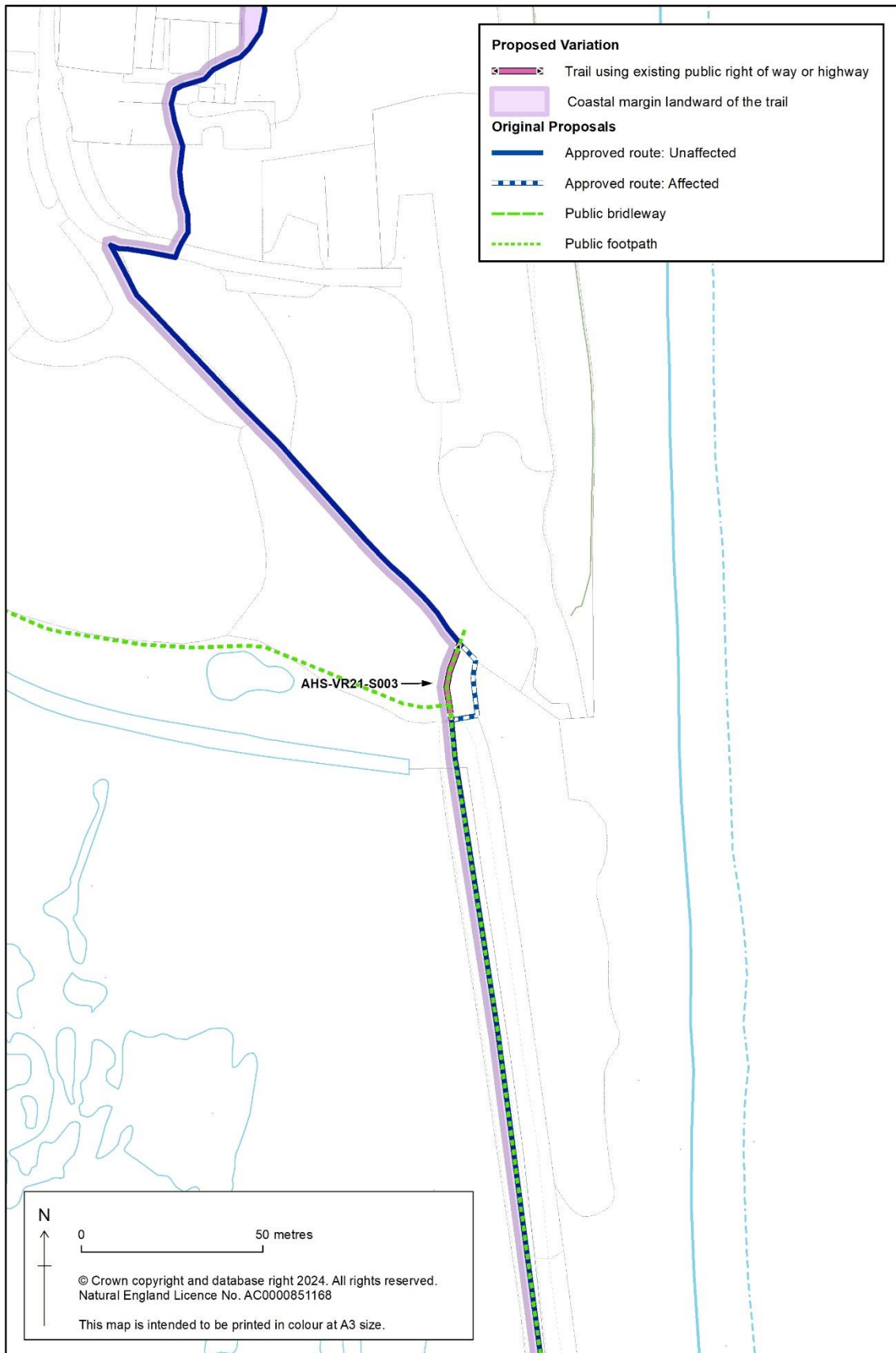








**Map VR21e Dunwich Heath**



**Map VR21f Dunwich Heath - Key Statutory Environmental Designations**

