



To commemorate the Coronation of His Majesty King Charles III and in recognition of his regard for the natural world, the Secretary of State for the Environment announced on 1 May 2023 that the England Coast Path would be renamed the **King Charles III England Coast Path** (KCIIIIECP).

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1. Introduction

This document details representations we have received on the stated coastal access report. These fall into two categories:

- Representations received from persons or bodies that must be sent in full to the Secretary of State ('full' representations, reproduced below); and
- Those which have not come from those persons or bodies whose representations we are required to send in full to the Secretary of State ('other' representations, summarised below).

It also sets out any comments that Natural England choose to make in response to these representations.

2. Background

Natural England's compendium of reports setting out its proposals for improved access to the coast from Aldeburgh to Hopton-on-Sea was submitted to the Secretary of State on 29th January 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 Southwold to Pakefield, Natural England received **42** representations, of which **3** 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 39 representations submitted by other individuals or organisations, referred to here as 'other' representations. Of those 39 'other' representations, 36 contain similar or identical points. Natural England's comments on 'other' representations are set out in two parts:

1. The recurring themes in the 36 'other' representations have been summarised in section 4 as 7 points, each with our comments on them.
2. 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.

Of 36 representations containing similar or identical points, 26 of those representations are identical to 26 of the objections received and commented on by Natural England.

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.

A further representation was received from [redacted] after the period of eight weeks beginning with the date on which the report was first advertised on Natural England's website. In compliance with Regulation 4(4) of the Coastal Access Reports (Consideration and Modification Procedure) (England) Regulations 2010 this representation has not been considered or passed on/summarised, though its content has been covered in other representations.

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

Representation number:	MCA/AHS6/R/3/AHS0862
Organisation/ person making representation:	<i>Ramblers Association</i>
Route section(s) specific to this representation:	AHS-4-S006 to AHS-4-S009, AHS-4-S016
Other reports within stretch to which this representation also relates:	None
Representation in full	
<p>We would like to commend the section AHS4 S006 to S009 as an improvement over the inland track originally surveyed.</p> <p>We also commend the cliff top route made available at AHS4 S016 as being much better than the routes through the woods that were initially considered.</p> <p>We welcome the fact that the use of paths through the Denes in AHS4 has been made possible by including restricted access proposals, and support the proposals.</p> <p>It is appreciated that since the original surveys, sea water has breached the proposed route in three places around Benacre, Covehithe and Easton broads. The Ramblers are therefore happy with the proposal to create the coastal path with three alternative inland routes which will be made available at times when the proposed coastal path is not available. It is assumed that the majority of coastal path users will prefer to be able to walk the route along the beach</p>	

and will therefore do so at suitable tide times and in reasonable weather. We welcome the use of fenced off areas during the bird breeding season, to accommodate the use of the beach routes.

Natural England's comments

Natural England welcomes the supportive comments of Suffolk Area Ramblers in relation to our proposals in report AHS 4.

Representation number:	MCA/AHS4/R/5/AHS0857
Organisation/ person making representation:	Suffolk County Council
Route section(s) specific to this representation:	AHS-4-S001 to AHS-4-S075 (whole report) AHS-4-OA001 to AHS-4-OA031
Other reports within stretch to which this representation also relates:	None

Representation in full

Suffolk County Council welcome these proposals for the England Coast Path for Southwold to Pakefield. This report will create new continuous coastal access which will provide much needed access opportunities for local people and coastal businesses.

It will legitimise the longstanding informal access that has existed either following the erosion of the previous cliff top public rights of way (example- AHS Report 4 AHS-4-S062 to AHS-4-S075), or that exist only as well walked desire lines (example- AHS Report 4 AHS-4-S-023 to AHS-4-S026).

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

Optional Alternative Routes (OAR)

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

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

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

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

Maintenance of OAR

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

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

Mitigation works

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

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

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

These include:-

- signs (AHS 4b AHS-4-S012)
- gates (AHS 4i AHS-4-OA003 and AHS-4-OA004)
- hedge planting on Easton OAR (AHS 4i AHS -4-S016)

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

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

Natural England's comments

Natural England welcomes the supportive comments of Suffolk County Council in relation to our report for AHS 4: Southwold to Pakefield.

Optional Alternative Routes (OARs)

Most of the Optional Alternative Routes (OARs) are aligned along existing walked routes, public rights of way (PROWs) or public highway. There are three sections of OAR where we were unable to do this, on proposed route sections AHS-4-OA001 to AHS-4-A003 (south of Easton Broad), AHS-4-OA008 to AHS-4-OA009 and AHS-4-OA014 to AHS-4-A016 (both south of Covehithe Broad). To note, in response to a change in the circumstances at Warren House, Natural England has identified a modification to AHS-4-OA014 to AHS-4-A016 south of Easton Broad, to instead go through Easton Woods, for consideration by the Secretary of State in response to objections received from the landowner and their tenants.

Signs will be installed at trail access points for all OARs explaining the legal circumstances under which they operate and the reasons for them. In addition, Natural England will ask the Ordnance Survey not to depict the OARs on their mapping systems, so that only those on the ground who may need them will be aware of their existence. We will also install lockable gates at either end of route sections AHS-4-OA001 to AHS-4-A003 (south of Easton Broad) and the modified OAR through Easton Woods, to be unlocked by National Nature Reserve staff when the main route is unavailable.

We believe these measures will be sufficient to avoid confusion and conflict between walkers and land managers for the sections of OAR not aligned along existing walked routes, PROW or public highway.

Maintenance of OARs

Most of the proposed OARs are aligned on PROWs and highways which the County Council are already legally required to maintain. There will however be some additional maintenance costs associated with the sections that aren't PROW or highway.

Natural England funds all the costs associated with the establishment of the trail and the OARs as well as any associated mitigation works identified in both our Habitats Regulation Assessment and Nature Conservation Assessments. Thereafter we make a regular contribution to the ongoing management and maintenance of the trail and any infrastructure associated with it. This contribution is made in accordance with the national funding arrangements in place at the time. It is calculated using parameters associated only with the main route, and whilst we would expect the main route to be the focus of maintenance activity in order to meet the National Trail quality standards, there is no specific clause that prevents an Access Authority from using some of our grant to maintain the alternative route if they felt that was the priority in any specific year.

Mitigation

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

The current National Trails funding formula is due to be reviewed in the light of the experiences of developing KCIIECP and the need to maintain mitigation works associated with Habitat Regulation Assessments. Natural England expect this to happen before the completion of KCIIECP establishment on this stretch.

Representation number:	MCA/AHS4/R/2/AHS0873
Organisation/ person making representation:	Suffolk Local Access Forum
Route section(s) specific to this representation:	AHS-4-S001 to AHS-4-S075 (whole report)
Other reports within stretch to which this representation also relates:	None
Representation in full	
<p>Thank you for consulting the Suffolk Local Access Forum on the three recently released reports on sections of the England Coast Path in Suffolk. A sub-group of SLAF have examined these reports and are generally pleased with the routes that have been put forward and would like to thank all those involved including Natural England staff, SCC rights of way officers and</p>	

landowners who have been working together on this project. We have examined the **Aldeburgh and Hopton-on-Sea report 4** and have set our comments below.

We welcome the decision to keep the English Coast Path adjacent to the sea from Southwold and Lowestoft as the use of roll-back will enable the path to remain as the cliffs are eroded over time. However we feel that the optional alternatives to walking the coast path between Easton Bavents and Benacre should be made permanent to take away the uncertainties of the broads being inundated if the shingle ridges are breached.

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

Natural England's comments

Natural England welcomes the supportive comments of Suffolk Local Access Forum in relation to our report for AHS 4: Southwold to Pakefield.

Three optional alternative routes (OAR) have been proposed in Coastal Access Report 4: Southwold to Pakefield, which the public can use to continue their onward journey around the coast when the proposed normal route seaward of Easton, Benacre and Covehithe Broads is unsuitable for use because of flooding and tidal action. Where the OARs are aligned on PROW or public highway, the public already have a legal right of access. Elsewhere, the OAR will only be legally available when the main route is unsuitable for use.

The closed PROW through Pottersbridge Marshes can only be changed by a legal order. Suffolk County Council has offered to divert the PROW free of charge to the landowner, onto the line of the proposed OAR on sections AHS-4-OA007 to AHS-4-S009, if the Secretary of State approves our proposal and the landowner prefers this.

Please refer to our comments under the Suffolk County Council's representation regarding measures to avoid confusion and conflict between walkers and land managers for the sections of OAR not aligned along existing walked routes, PROW or public highway.

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

Representation ID	Organisation/ person making representation
MCA/AHS4/R/7/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/8/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/9/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/10/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/11/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/12/AHS1486	[redacted]
MCA/AHS4/R/13/AHS1289	[redacted]
MCA/AHS4/R/14/AHS1349	[redacted]
MCA/AHS4/R/15/AHS1487	[redacted]
MCA/AHS4/R/17/AHS1488	[redacted]
MCA/AHS4/R/16/AHS1344	[redacted]

MCA/AHS4/R/18/AHS1489	[redacted] (aka [redacted])
MCA/AHS4/R/19/AHS1490	[redacted]
MCA/AHS4/R/20/AHS1348	[redacted]
MCA/AHS4/R/21/AHS1491	[redacted]
MCA/AHS4/R/22/AHS1346	[redacted]
MCA/AHS4/R/24/AHS1494	[redacted]
MCA/AHS4/R/23/AHS1493	[redacted]
MCA/AHS4/R/26/AHS1494	[redacted] aka [redacted]
MCA/AHS4/R/25/AHS1341	[redacted]
MCA/AHS4/R/27/AHS1350	[redacted]
MCA/AHS4/R/42/AHS1347	[redacted]
MCA/AHS4/R/43/AHS1345	[redacted]
MCA/AHS4/R/36/AHS1498	[redacted]
MCA/AHS4/R/40/AHS1500	[redacted]
MCA/AHS4/R/41/AHS1501	[redacted]
MCA/AHS4/R/28/AHS1495	[redacted]
MCA/AHS4/R/30/AHS1496	[redacted]
MCA/AHS4/R/31/AHS1497	[redacted]
MCA/AHS4/R/35/AHS1338	[redacted]
MCA/AHS4/R/37/AHS1351	[redacted]
MCA/AHS4/R/38/AHS1499	[redacted]
MCA/AHS4/R/39/AHS1353	[redacted]
Name of site:	Benacre Estate
Report map reference:	AHS 4b, 4c, 4d, 4e, 4i, 4j, 4k
Route sections on or adjacent to the land:	The route and optional alternative route sections AHS-4-S014 to AHS-4-S034, and AHS-4-OA004 to AHS-4-OA031
<p>Summary of point 1: The need for the proposed Optional Alternative Routes (OARs)</p> <p>Those making representations do not consider all of the proposed Optional Alternative Routes (OARs) are justified in terms of the number of occasions the main route will be unavailable.</p> <p>Modifications proposed by the representations:</p> <p>AHS-4-OA025 should be removed. Walkers should be able to use AHS-4-OA026 as an alternative route. As a consequential effect, AHS-4-OA024 should also be removed. As a compromise, we are willing to offer/accept the “blue” route to provide a link to AHS-4-OA026 for walkers to use as an optional alternative route.</p> <p>AHS-4-OA013 to AHS-4-OA016 should be removed. Walkers will be able to continue their journey along the remainder of the optional alternative route (AHS-4-OA017 – AHS-4-OA023).</p> <p>There should not be an optional alternative route around Easton Broad. Alternatively, if an optional alternative is deemed necessary, the sections from AHS-4-OA005 to AHS-4-OA010 should be along the existing public right of way.</p>	

Sections AHS-4-OA020, AHS-4-OA021 and AHS-4-OA022 should follow the route of Covehithe Footpath 0002 through the wood.

Natural England comment:

The Estate owns approximately 6 km of Suffolk's 80 km coast. The shoreline along its coastal frontage is generally comprised of shingle, which is being eroded back, but there are cliff sections at Covehithe and Easton Woods. Between these areas of higher land there are three broads, Benacre Broad, Covehithe Broad and Easton Broad, which are coastal lagoons partially protected by shingle banks. These banks do not form a complete barrier to flooding, and periodically can be both flooded and overtopped or completely breached.

The proposed route of the main trail can therefore be rendered unusable in front of these three broads in two ways, by the sea flooding across the beach and overtopping them and also by the sea breaching the shingle banks completely. Breaching can render the main route unavailable for a number of weeks and flooding a number of hours.

The data provided by the Estate (representation reference MCA/AHS4/R/8/AHS0375) records when Easton and Benacre Broad have been breached and would cut off the main trail. No data is provided for Covehithe Broad, but potentially the frequency and duration of breaches would be similar.

The data demonstrates that the beaches at Easton and Benacre Broad can be breached independently of each other. For example, in January 2020 Easton Beach was breached by the sea for 9 days when Benacre beach was still available and in January 2019 Benacre beach was breached by the sea for 11 days when Easton beach was still available. In addition to these events, the shingle ridges that the route is on will be flooded periodically by very high tides at any time of the year, which our previous estimate averaged at 6 times a year. We consider these occasions alone are of a frequency and duration to require an OAR to enable walkers to safely continue their journeys.

The pace of coastal change here is rapid and ongoing, driven by rising sea levels and the trend for more frequent and more intense storms. Added to this the shoreline management policy in this location is predominantly "no active intervention" to allow the natural shoreline processes to continue. As a result, it predicts that the coast here will be subject to significant ongoing erosion, and that these shingle barriers will move landward and the three broads will evolve naturally, becoming narrower and more frequently overtopped as time passes. We therefore expect the occasions that the main route might be regarded as unsuitable for use by walkers because of flooding and tidal action to increase over time, reinforcing the need for an OAR.

Because the three broads can be flooded at different times, Natural England have proposed multiple OARs to allow onward access from either direction on the trail during each possible scenario when the trail will be unavailable. The OARs provide the most obvious and shortest diversions from the main route, for access users' safety and convenience. Natural England's view is that all the proposed OARs are necessary to achieve this. To note, it is extremely unlikely that all of the OARs would be in use at the same time.

The Estate states “we would have no objection if the OAR were to follow existing public rights of ways and highways (i.e. sections AHS-4-OA001 to AHS-4-OA12, AHS-4-OA017 to AHS-4-OA023, and AHS-4-OA026 to AHS-4-OA031).” In our response under point 2: Optional Alternative Routes not following Public Rights of Way we address the status of the OAR sections objected to.

Representations ID	Organisation/ person making representation
MCA/AHS4/R/7/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/8/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/9/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/10/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/11/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/12/AHS1486	[redacted]
MCA/AHS4/R/13/AHS1289	[redacted]
MCA/AHS4/R/14/AHS1349	[redacted]
MCA/AHS4/R/15/AHS1487	[redacted]
MCA/AHS4/R/17/AHS1488	[redacted]
MCA/AHS4/R/16/AHS1344	[redacted]
MCA/AHS4/R/18/AHS1489	[redacted] (aka [redacted])
MCA/AHS4/R/19/AHS1490	[redacted]
MCA/AHS4/R/20/AHS1348	[redacted]
MCA/AHS4/R/21/AHS1491	[redacted]
MCA/AHS4/R/22/AHS1346	[redacted]
MCA/AHS4/R/24/AHS1494	[redacted]
MCA/AHS4/R/23/AHS1493	[redacted]
MCA/AHS4/R/26/AHS1494	[redacted] aka [redacted]
MCA/AHS4/R/25/AHS1341	[redacted]
MCA/AHS4/R/27/AHS1350	[redacted]
MCA/AHS4/R/42/AHS1347	[redacted]
MCA/AHS4/R/43/AHS1345	[redacted]
MCA/AHS4/R/36/AHS1498	[redacted]
MCA/AHS4/R/40/AHS1500	[redacted]
MCA/AHS4/R/41/AHS1501	[redacted]
MCA/AHS4/R/28/AHS1495	[redacted]
MCA/AHS4/R/30/AHS1496	[redacted]
MCA/AHS4/R/31/AHS1497	[redacted]
MCA/AHS4/R/35/AHS1338	[redacted]
MCA/AHS4/R/37/AHS1351	[redacted]
MCA/AHS4/R/38/AHS1499	[redacted]
MCA/AHS4/R/39/AHS1353	[redacted]
Name of site:	Benacre Estate
Report map reference:	AHS 4b, 4c, 4d, 4e, 4i, 4j, 4k
Route sections on or adjacent to the land:	AHS-4-OA005 to AHS-4-OA010, AHS-4-OA013 to AHS-4-OA016, AHS-4-OA018

	to AHS-4-OA021 and AHS-4-OA024 to AHS-4-OA025
<p>Summary of point 2: Optional Alternative Routes not following Public Rights of Way</p> <p>The representations suggest that people can follow public rights of way, without the need for any Optional Alternative Routes not on public rights of way, and that the existing Suffolk Coast Path could be used as an OAR.</p> <p>Modifications proposed by the representations:</p> <p>AHS-4-OA025 should be removed. Walkers should be able to use AHS-4-OA026 as an alternative route. As a consequential effect, AHS-4-OA024 should also be removed. As a compromise, we are willing to offer the “blue” route to provide a link to AHS-4-OA026 for walkers to use as an optional alternative route.</p> <p>AHS-4-OA013 to AHS-4-OA016 should be removed. Walkers will be able to continue their journey along the remainder of the optional alternative route (AHS-4-OA017 – AHS-4-OA023).</p> <p>There should not be an optional alternative route around Easton Broad. Alternatively, if an optional alternative is deemed necessary, the sections from AHS-4-OA005 to AHS-4-OA010 should be along the existing public right of way.</p> <p>Sections AHS-4-OA020, AHS-4-OA021 and AHS-4-OA022 should follow the route of Covehithe Footpath 0002 through the wood.</p>	
<p>Natural England’s comment:</p> <p>The proposed route for the KCIIIECP follows a route similar to the existing Suffolk Coast Path but departs from this in places in order to be closer to the sea and maintain sea views. In particular, the Suffolk Coast Path goes up to 2 miles inland between Easton Bavents and Benacre, and therefore this route doesn’t provide a suitable, coastal OAR in this location (see map below).</p>	



The red line on the map shows route of the existing Suffolk Coast Path

There are four locations where the representations say that the OARs do not follow public rights of way (PROW). These are:

- a) Pottersbridge Marshes - AHS-4-OA005 to AHS-4-OA0010,
- b) Warren House – AHS-4-OA013 to AHS-4-OA016,
- c) Covehithe Broad Wood – AHS-4-OA020 to AHS-4-OA022 and
- d) Mill Lane, Covehithe – AHS-4-OA024 and AHS-4-OA025.

Natural England's comments address each of these proposed route sections in turn.

Pottersbridge Marshes - AHS-4-OA005 to AHS-4-OA0010

Natural England have proposed OAR sections AHS-4-OA005, AHS-4-OA006 and AHS-4-OA010 follow the PROW at this location.

Natural England normally propose to adopt an existing PROW where it's safe and practicable for the public to use, it can be used at all times, and the alignment makes sense in terms of the other statutory criteria and principles set out in this Scheme. Where this is not the case, we sometimes conclude that we should propose to use a new route, in line with section 4.7.3 of the Scheme.

At Pottersbridge Marshes we considered aligning OAR sections AHS-4-OA007 to AHS-4-OA009 along the PROW which runs parallel to but seaward of the proposed route. However, we found water levels have risen here, and as a result the PROW and the current length of boardwalk on it, is now subject to frequent inundations. This happens both as a result of surge events, and also because the ability of the marshes to drain into the sea is prevented by the repeated blockage of the Easton Broad outflow pipe. Suffolk County Council advised us this now becomes blocked monthly and requires an Environment Agency digger to be sited near the outflow pipe to rapidly unblock it.

As a result, the board walk on the PROW has fallen into disrepair, and the PROW has been closed. The Access Authority have advised us that even if repaired the

boardwalk will continue to be subject to frequent flooding events and need constant ongoing maintenance. As such we did not feel it would provide a reliable OAR when the main route was unavailable due to flooding.

Natural England therefore decided to propose the line of OAR on sections AHS-4-OA007 to AHS-4-OA009 landward of the PROW, where it would not be subject to flooding, it would provide a safer and more convenient route for walkers, and it would be cost effective to establish and maintain long term.

The closed PROW through Pottersbridge Marshes can only be changed by a legal order. **Suffolk County Council has offered to divert the PROW free of charge to the landowner, onto the line of the OAR, should the landowner prefer this if the SoS approves our proposals here.**

Warren House – AHS-4-OA013 to AHS-4-OA016

There are no public footpaths that would link the main route with the OAR between Easton Broad and Covehithe Broad. We therefore proposed an OAR along an existing track past Warren House, in line with section 4.7.3 of the Scheme.

Since our proposal was published, landscaping work at Warren House has removed the hedging and fencing between the garden and the adjacent track on AHS-4-OA014 & AHS-4-OA015. Because there is no longer any separation between the track that the OAR was aligned upon and the garden that was there, it may now form part of the curtilage of the house, in which case it would be excepted land under Schedule 1 from coastal access rights.

To avoid crossing excepted land, Natural England has identified a modified OAR through Easton Woods, which we discussed with the Estate on 13 April 2023. Natural England is flexible about where the route of the modified OAR through Easton Woods would be, so long as it avoids a sensitive area in the south, in the older part of the wood. We are awaiting further correspondence from the Estate to confirm their preference for a modified route, which we will be happy to consider on site with the Inspector. Our suggested route for a modified OAR is shown on the map below.

Should the Secretary of State approve a modified OAR, Natural England would install signage and lockable gates at either end, to be unlocked by National Nature Reserve staff when the main route is unavailable.



The map image included depicts Natural England's suggested route for a modified OAR.

Covehithe Broad Wood – AHS-4-OA018 to AHS-4-OA021

Natural England expected to propose that OAR sections AHS-4-OA018 to AHS-4-OA021 follow the PROW at this location. On site however, the public footpath had become overgrown and was no longer passable and over time a slightly different route had become established through the vegetation, which we decided to use.

Should the Secretary of State prefer it, we would be content to modify our alignment of OAR sections AHS-4-OA018 to AHS-4-OA021 to ensure they are contiguous with the definitive line of the PROW here which is Covehithe FP2, and work with relevant stakeholders to reopen this footpath at establishment stage.

Mill Lane, Covehithe – AHS-4-OA024 and AHS-4-OA025

The Estate and its tenants state that the road forming route sections AHS-4-OA024 and AHS-4-OA025 of the OAR has been closed.

Natural England investigated the status of Mill Lane with the Highway Authority. We discovered two Traffic Regulation Orders (TROs) pertaining to it, and the Highway Authority carefully measured the extent of these TROs on the ground for us. As a

result, we can confirm that there are restrictions on vehicular use of the road covering the easternmost section of AHS-4-OA024 and the first few metres of AHS-4-OA025 to approximately the location of the gate across AHS-4-OA025, but pedestrian rights are unaffected. From the easternmost boundary of Church Farm (approximately where the field gate is located across AHS-4-OA025 – about 13m east from the junction of AHS-4-OA024 and AHS-4-OA025) vehicular rights have been removed, but pedestrian rights are unaffected. All highway rights, including pedestrian rights, have been removed from a point 272m east from the field gate, which is seaward of the main trail (and now part of beach due to coastal erosion).



Figure 3: Location of features on Mill Lane

Natural England can confirm that the OAR sections AHS-4-OA024 and AHS-4-OA025 are correctly described in our reports as public highways because they use an existing highway, which has pedestrian rights for its whole length up to the main trail.

We used our discretion to propose that the hedgerows either side of AHS-4-OA025 should form the seaward and landward boundary of the trail, as these form a recognisable physical feature making the extent of the rights clearer on the ground. This is in line with section 4.8.11 of the Scheme.

Proposed route sections AHS-4-OA024 and AHS-4-OA025 utilise an existing public highway with pedestrian rights and provides the shortest most convenient route for walkers unable to use the main trail past Benacre Broad. Natural England does not therefore agree with the proposed modification that AHS-4-OA025 should be removed and as a consequential effect, AHS-4-OA024 should also be removed.

The Estate and its tenants suggest AHS-4-OA024 and AHS-4-S025 are replaced with the route marked in blue to provide a link to AHS-4-OA026 for walkers to use as an OAR. Natural England opted to propose the OAR follow AHS-4-OA025 RD because this route was significantly shorter and more convenient for walkers than using AHS-4-OA026 FP if they were walking north and found Benacre Broad unavailable. In addition, we did not feel it would be realistic to expect walkers to walk past the end of Mill Lane, which has pedestrian rights along it, and instead go downhill to Green Heath to access AHS-4-OA026 FP and then walk back uphill to Covehithe, a distance of approximately 1.6 km (1 mile) taking around 20-30 minutes.

Similarly we considered that walkers travelling north and finding Covehithe Broad unavailable could not then reasonably be expected, instead of using Mill Lane to get back to the main trail along the cliff top, to walk downhill to Green Heath on the public footpath and back up the hill again to get to the end of Mill Lane (1.6 km or 1 mile). Doing that would take around 20-30 minutes to reach a point they could reach via Mill Lane in less than 10 minutes.

So Natural England do not agree with the proposed modification to remove AHS-4-OA025 and as a consequence of this also removing AHS-4-OA024. We can find no evidence to justify it and believe people would use AHS-4-OA025 to access the main trail even if it didn't form part of the OAR. This is because they have a legal right to do so, and it is the shortest and most convenient route for walkers to use.

Representation ID	Organisation/ person making representation
MCA/AHS4/R/7/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/8/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/9/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/10/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/11/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/28/AHS1495	[redacted]
MCA/AHS4/R/30/AHS1496	[redacted]
MCA/AHS4/R/31/AHS1497	[redacted]
MCA/AHS4/R/35/AHS1338	[redacted]
MCA/AHS4/R/37/AHS1351	[redacted]
MCA/AHS4/R/38/AHS1499	[redacted]
MCA/AHS4/R/39/AHS1353	[redacted]
Name of site:	Benacre Estate
Report map reference:	AHS 4b, 4c, 4d, 4e, 4i, 4j, 4k
Route sections on or adjacent to the land:	AHS-4-OA005 to AHS-4-OA010, AHS-4-OA013 to AHS-4-OA016 AHS-4-OA020 to AHS-4- AHS-4-OA022, AHS-4-OA024 and AHS-4-OA025
Reference number(s) of any full representations relevant to this representation:	MCA/AHS4/R/3/AHS0857 Suffolk County Council MCA/AHS4/R/2/AHS0873 Suffolk LAF
Summary of point 3: Illegal use of Optional Alternative Routes	
The representations are concerned that the OARs which are not aligned on public rights of way will be used outside of their legal parameters.	
Natural England's comment:	

Natural England understands the concern that, if people become used to using an OAR because the main route is impassable, they may want to continue using it once the main route is open again. We minimise the risk of this occurring by normally proposing alignment of OARs on existing PROW or other clearly walked lines along the coast, whatever their status and where the alignment makes sense in terms of the statutory criteria and principles set out in the Scheme. However, where this is not possible, we do occasionally conclude that we should propose to create a new route. This is in line with section 4.7.3 of the Scheme.

The proposals tables for Report AHS 4: Southwold to Pakefield at section 4.3.2 OAR details: Maps AHS 4i to AHS 4k, show that the vast majority of OARs have been proposed along existing walked routes, PROWs or public highway, and that only route sections AHS-4-OA008, AHS-4-OA009, and AHS-4-OA014 to AHS-4-OA016 do not follow existing walked routes, PROWs or public highway. This shows that by careful choice of route alignment our proposals already minimise the potential for the public to use OARs where they are not already doing so either by virtue of an existing right, with the owner or occupiers' permission or by traditional tolerance.

The decision as to whether a walker feels safe and confident to attempt to use the main trail when it is starting to become or has become flooded is subjective and will depend on the abilities of the walker and their knowledge of the area. We are keen to support the legal use of the OARs without encouraging walkers to attempt to use the main trail if they do not feel safe to do so. To do this we have proposed signage is placed at the entrance points to the OARs and the wording and design carefully chosen in liaison with relevant interests to say under what circumstances they can be used.

See point 2: Optional Alternative Routes not following Public Rights of Way for proposed modifications on our alignment of OAR sections AHS-4-OA018 to AHS-4-OA021 and on OAR sections AHS-4-OA013 to AHS-4-OA016.

Representation ID	Organisation/ person making representation
MCA/AHS4/R/8/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/9/AHS0375	[redacted] for Benacre Estate
MCA/AHS4/R/14/AHS1349	[redacted]
MCA/AHS4/R/15/AHS1487	[redacted]
MCA/AHS4/R/17/AHS1488	[redacted]
MCA/AHS4/R/16/AHS1344	[redacted]
MCA/AHS4/R/18/AHS1489	[redacted] (aka [redacted])
MCA/AHS4/R/19/AHS1490	[redacted]
MCA/AHS4/R/20/AHS1348	[redacted]
MCA/AHS4/R/21/AHS1491	[redacted]
MCA/AHS4/R/22/AHS1346	[redacted]
MCA/AHS4/R/24/AHS1494	[redacted]
MCA/AHS4/R/23/AHS1493	[redacted]
MCA/AHS4/R/26/AHS1494	[redacted] aka [redacted]
MCA/AHS4/R/25/AHS1341	[redacted]
MCA/AHS4/R/27/AHS1350	[redacted]
MCA/AHS4/R/42/AHS1347	[redacted]
MCA/AHS4/R/43/AHS1345	[redacted]

MCA/AHS4/R/36/AHS1498	[redacted]
MCA/AHS4/R/40/AHS1500	[redacted]
MCA/AHS4/R/41/AHS1501	[redacted]
MCA/AHS4/R/32/AHS1333	[redacted]
MCA/AHS4/R/33/AHS1338	[redacted]
Name of site:	Covehithe and Warren House
Report map reference:	AHS 4b, 4c, 4d, 4e, 4i, 4j, 4k
Route sections on or adjacent to the land:	AHS-4-OA13 to AHS-4 OA16, AHS-4-OA024 to AHS-4-OA026

Summary of point 4: Impacts on privacy of residents and loss of income

The representations state that the OAR along AHS-4-OA025 will adversely affect the privacy of residents along Mill Lane. Furthermore, it is stated that, together with the public footpath at route section AHS-4-OA026, the properties will be surrounded by access on all sides.

The representations state that the OAR at Warren House on AHS-4-OA013 to AHS-4-OA016 will have a detrimental impact on privacy and rental income at Warren House.

Natural England's comment:

AHS-4-OA025

Please refer to Natural England's comments under the point 2: Optional Alternative Routes not following Public Rights of Way, where we have outlined our investigation into the status of Mill Lane. This showed that the OAR on sections AHS-4-SOA024 and AHS-4-OA025 proposed along Mill Lane follow an existing public highway, which has pedestrian rights all the way up to the proposed main trail. A small number of properties on the south side of Mill Lane are also backed by an existing public footpath along which we propose to align AHS-4-OA026.

Coastal access rights do not apply to existing public highways including roads and public rights of way such as byways, bridleways and footpaths. The public already has the right to use such highways, which takes precedence over the coastal access rights, and it is not unusual for paths or highways to be near residential property.

Mill Lane is already accessible, and draws visitors to the medieval ruin of St Andrew's church (see screenshot from Google Maps below, linked here: [2 Mill Ln - Google Maps](#)) As the proposal does not introduce a new right of access, Natural England does not accept that an issue with privacy is created by the proposal. We have aligned the main route along the beach on this section, and ECP trail users will only be directed to the OAR when the main route is unavailable. Therefore, we do not anticipate a significant increase in access from ECP trail users.

Whilst Mill Lane is currently a dead end for walkers, if the proposed main trail is approved walkers will legally be able to use Mill Lane to access the KCIIECP. We believe they will do this regardless of whether it is approved as part of the OAR or not, because this is a convenient access point onto the trail.

Natural England does not agree that AHS-4-OA025 should be removed or that walkers should have to use AHS-4-OA026 as the alternative route.

AHS-4-OA013 to AHS-4-OA016

Natural England's view was that it would be possible for walkers to use the track at Warrant House without being seen by its tenants because views of the house were blocked by a substantial fence, with the onward route towards the main trail located within mature vegetation. We felt this would be sufficient to protect the tenants' privacy, and the property would therefore retain a comparable rental income.

As the circumstances have now changed, so has Natural England's view. Please refer to Natural England's comments under point 2: Optional Alternative Routes not following Public Rights of Way for our proposed modification on OAR sections AHS-4-OA013 to AHS-4-OA016.

Representation ID	Organisation/ person making representation
MCA/AHS4/R/8/AHS0375	Benacre Estate
MCA/AHS4/R/12/AHS1486	[redacted]
MCA/AHS4/R/13/AHS1289	[redacted]
Name of site:	The Warren and Covehithe Cliffs
Report map reference:	AHS 4c and 4d
Route sections on or adjacent to the land:	AHS-4-S0017, AHS-4-S020 to AHS-4-S024 and AHS-4-OA025

Summary of point 5: Impact on livestock (biosecurity and fencing)

The Estate and its farm tenants state that Mill Lane provides a safe link into the pig field which is biosecure, and that this would be compromised by the proposal to align the OAR section AHS-4-OA025 along it.

The Estate and its farm tenants state that route Section AHS-4-S021 runs across land covered by pens used for the temporary detention of livestock, and that maintaining biosecurity here is of crucial importance. A modification is proposed to include fencing alongside sections AHS-4-S020 to AHS-4-S024, to provide biosecurity for the areas used by the pigs and for the public's safety.

Natural England's comment:

Biosecurity

As explained under point 2: Optional Alternative Routes not following Public Rights of Way, Mill Lane is a public highway, and as such the OAR does not introduce any new right of access that would affect the existing management of biosecurity.

During a site visit on 13 September 2019, Natural England's staff found that the gate at the entrance to the pig field off Mill Lane was left open during the day, which the tenant farmers advised us was to allow the tractor to move in and out more easily. We

also observed people walking along the open track through the pig field to the cliff top at Covehithe, which the tenant farmers confirmed others also do. Natural England believe that if walkers have a clearly signed OAR, they will be encouraged to stick to Mill Lane to get back to the main trail on the cliff top, rather than using the open track through the fields where the pigs are currently kept. We believe that this, in addition to closing the gate across the entrance to the pig field, will help the tenant farmers to maintain biosecurity.



Figure 2. Location of features referred to on Mill Lane.

Natural England does not agree that Mill Lane provides a biosecure link for the tenant farmers into their pig field, and believes that in proposing the OAR along this public highway, we have found the fair balance that the legislation requires.

Fencing

On previous site visits with the tenant farmers here, Natural England observed that the pigs kept in fields on Covehithe cliff top were already fenced in with more than one line of fencing, one of which usually included an electric fence, both to keep pigs in and to keep any people informally using the cliff top out. We sought advice from a Senior Agri-Environment Adviser at Natural England who advised that an electric fence provides a suitable barrier. Natural England therefore believes the farmer is already taking the necessary precautions to maintain biosecurity and public safety here.

We do not agree with the proposed modification to install permanent fencing, as this would need moving from time to time as the cliff erodes back. We would however be happy to support the tenant farmers' security measures here via a one-off payment at establishment stage for some further temporary electric fencing to be used on the seaward edge of the fields. This is because we recognise that there will be an increased use of the route by walkers. We would also be happy to provide appropriate signage, informing people to keep their dogs on leads, to warn about biosecurity issues and to encourage responsible access use.

The Estate requested that the proposal for route section AHS-4-S017 be modified to include fencing to separate cattle which are grazed here from walkers and their dogs.

During a site visit on 16 November 2021, Natural England observed that stock proof fencing has now been installed on the landward side of the proposed route (see photo below).



The image included depicts a fence line across an open field area.

Representation ID	Organisation/ person making representation
MCA/AHS4/R/9/AHS0375	Benacre Estate
MCA/AHS4/R/10/AHS0375	Benacre Estate
Name of site:	Pottersbridge Marshes and The Warren
Report map reference:	4i
Route sections on or adjacent to the land:	AHS-4-OA005 to AHS-4-OA0010, AHS-4-OA013 to AHS-4-OA016
Summary of point 6: Impact of Optional Alternative Routes on nature conservation and Environmental Stewardship Schemes <p>The Estate states that the OAR around Easton Broad near Pottersbridge Marshes and Warren House will have a detrimental impact on nature conservation and Environmental Stewardship Scheme agreements the Estate has entered into in the vicinity.</p>	
Natural England's comment: <p>Natural England maintains that over the course of developing our proposals for the KCIIIECP between Aldeburgh and Hopton-on-Sea, we thought carefully about possible impacts on local, national and European sites and their associated designated features that could be affected. We have taken an iterative approach to developing and refining our access proposals, including thorough discussion with specialists with relevant local knowledge, and are satisfied that sufficient measures are included to mitigate the risks. Our findings have been written up in the Habitat Regulations Assessment and Nature Conservation Assessments that were published alongside our proposals. These conclude that the proposals are fully compatible with our duty to further the conservation and enhancement of the notified features of the</p>	

relevant SSSIs and also that the proposals we have made will not be likely to have a significant effect on a European site that gives rise to the real risk of an adverse effect on its overall integrity.

In developing our proposals Natural England also took advice in relation to their compatibility with the Environmental Stewardship Schemes on the Benacre Estate. We can confirm that there are no Higher Level Stewardship options on land affected by our proposals which have prescription within them that prohibit public access.

The Estate disagrees with Natural England's statement in the HRA that the optional alternative routes will prevent walkers attempting to access inland areas from the main route, because they consider it is "physically impossible to get from the main route into these protected areas, it appears that there is no justification for these optional alternative routes, and they are entirely unnecessary." Whilst those local to the area may appreciate the physical difficulties of crossing wetland areas, our view is that those unfamiliar with the area would try to navigate inland if the main route is unavailable and there is no clearly signed OAR to follow.

OAR route sections AHS-4-OA005 to AHS-4-OA010

The Estate states that we did not assess the impact of the OAR around Easton Broad on Stone Curlew plots to the north of Pottersbridge Marshes.

Our Assessment of Coastal Access Proposals between Southwold and Pakefield on sites and features of nature conservation concern, published with our proposal for the KCIIIECP between Aldeburgh and Hopton-on-Sea, states that "one unit hosting [stone curlew] which is geographically closest to a section of PROW being proposed as part of the Easton Broad OAR, is spatially separate from it, therefore we do not consider the proposals will have a detrimental impact on the feature."

The Estate believes we have proposed route section AHS-4-OA009 instead of the PROW to avoid potential disturbance to nesting marsh harriers.

To clarify, the wider vicinity was identified as an area where Marsh Harrier may nest, and in our report we state that the alignment of proposed OAR section AHS-4-OA009 "avoids potential disturbance to nesting marsh harrier". We agree with the Estate that the adjacent alignment of the PROW also avoids potential disturbance to nesting marsh harrier.

Please refer to Natural England's comments under the point 2: Optional Alternative Routes not following Public Rights of Way, where we have explained our reason for not using the PROW on OAR sections AHS-4-OA007 to AHS-4-OA010.

Representation ID	Organisation/ person making representation
MCA/AHS4/R/9/AHS0375	Benacre Estate
MCA/AHS4/R/10/AHS0375	Benacre Estate
MCA/AHS4/R/33/AHS1338	[redacted]
MCA/AHS4/R/32/AHS1333	[redacted] (deceased)
MCA/AHS4/R/12/AHS1486	[redacted]

MCA/AHS4/R/13/AHS1289	[redacted]
Name of site:	Warren House, The Warren, Covehithe Cliffs
Report map reference:	AHS 4c, 4d, 4j
Route sections on or adjacent to the land:	AHS-4-OA015, AHS-4-S017, AHS-4-S021
Summary of point 7: Excepted land The representations state that in three instances the route is aligned on land excepted from coastal access rights.	
Natural England comment: <u>AHS-4-OA015</u> The tenant at Warren House and the tenant at Keeper's Cottage in Easton Wood objected to the OAR on route section AHS-4-OA0015, stating that the route was located within the curtilage of the house, and therefore excepted from coastal access rights. Natural England's view was that the track was separate from the house and not part of the curtilage, and therefore not excepted from the coastal access rights under Schedule 1 of the CROW Act. As the circumstances have now changed, so has Natural England's view. Please refer to Natural England's comments under point 2: Optional Alternative Routes not following Public Rights of Way for our proposed modification on OAR sections AHS-4-OA013 to AHS-4-OA016. <u>AHS-4-S017</u> Representations state that "land immediately west of AHS-4-S017 will be grazed by cattle as part of an agreement with Natural England. The Estate has, nevertheless, agreed to the positioning of the path across that excepted land, and along the coast." To clarify, land grazed by livestock is not a category of land which is excepted from the coastal access rights under Schedule 1 to the CROW Act. <u>AHS-4-S021</u> Representations state that route section AHS-4-S021 "passes through land with pens used for the temporary detention of livestock and is therefore excepted land". The route follows the cliff edge, avoiding any pens in use for the temporary reception or detention of livestock that would be landward of the route. Therefore, the route will be adjacent to excepted land, but not upon it.	

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

Representation ID:	MCA/AHS4/R/10/AHS0375
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Organisation/ person making representation:	Benacre Estate
Name of site:	Pottersbridge Marshes, Benacre Estate
Report map reference:	AHS 4b and 4i
Route sections on or adjacent to the land:	AHS-4-OA005 to AHS-4-OA010 and AHS-4-OA012
Other reports within stretch to which this representation also relates	None
Summary of representation: The Estate states that there has been no discussion on the infrastructure required on route sections AHS-4-OA005 to AHS-4-OA010.	
Natural England's comment: The new infrastructure required to establish the routes proposed in AHS 4: Southwold to Pakefield is detailed in the section of our report entitled "Establishment of the trail". Significant items of infrastructure are also shown on the associated maps AHS 4a to AHS 4k. No establishment will be undertaken on this stretch until after our proposals have been approved by the Secretary of State, and this has been discussed with the landowner as outlined in section 3.4.16 of the Scheme. We will then work closely in partnership with relevant parties including the landowner to plan and conduct the establishment work.	

Representation ID:	MCA/AHS4/R/1/AHS1470
Organisation/ person making representation:	[redacted]
Name of site:	Southwold to Pakefield
Report map reference:	Map A (4h)
Route sections on or adjacent to the land:	AHS-4-S062 to AHS-4-S075
Other reports within stretch to which this representation also relates	None
Summary of representation: The representation suggests that, due to cliff top erosion, the section between Kessingland and Pakefield is not safe, and a more inland route should be used instead.	
Natural England's comment:	

Natural England agrees that this part of the Suffolk coast is subject to significant ongoing erosion. Safety has therefore been a key consideration in the design of the trail here, in accordance with our duty under section 297(2)(a) of the 2009 Act to have regard to the safety of people using the trail. However, we were mindful that section 7.1.9 of the Scheme advises that access along cliffs carries inherent risks, which are well-understood by most people, and that it is therefore neither possible nor desirable to eliminate all danger to the public on cliffs.

We have addressed safety concerns by proposing that the trail is aligned a safe distance from the cliff edge, and where we consider walkers might not reasonably be able to anticipate the dangers posed by natural features along the cliff top, we propose to install signs to advise them of the dangers and encourage them to remain a safe distance from the edge.

We have proposed roll back for trail sections that are vulnerable to erosion, and if our proposals are approved, the trail will roll back as the cliff erodes without further reference to the Secretary of State, in accordance with a description in our report

Representation ID:	MCA/AHS4/R/4/AHS1485
Organisation/ person making representation:	Woodland Trust
Name of site:	Easton Wood SSSI SPA NNR
Report map reference:	AHS 4c – Easton Wood to Green Heath
Route sections on or adjacent to the land:	AHS-4-S016
Other reports within stretch to which this representation also relates	None

Summary of representation:

The Trust requests that the impact to ancient woodland is limited as far as possible, in recognition of the fact that it is irreplaceable.

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

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

Natural England's comment:

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

Easton Wood NNR is managed by Natural England, and following the necessary approval by Secretary of State, our NNR staff will oversee establishment works and ensure that any infrastructure has a minimal impact on ancient woodland.

Representation ID:	MCA/AHS4/R/6/AHS1458
Organisation/ person making representation:	Disabled Ramblers
Name of site:	Southwold to Pakefield
Report map reference:	AHS 4a to AHS 4k
Route sections on or adjacent to the land:	All route sections generally
Other reports within stretch to which this representation also relates	None
<p>Summary of representation:</p> <p>The Disabled Ramblers consider that Natural England has not given sufficient consideration to those with limited mobility, especially those who use mobility vehicles.</p>	
<p>Natural England's comment:</p> <p>Section 4.3 of the Scheme – ‘Adjustments for disabled people and others with reduced mobility’ guides our approach to aligning the trail to ensure that it is as inclusive as possible.</p> <p>Section 4.3.8 states: <i>“We follow the principles set out in our publication “By All Reasonable Means” to make the trail as easy to use as we reasonably can for disabled people and others with reduced mobility, whilst accepting that such opportunities will often be constrained by practical limitations, such as the rugged nature of the terrain or the availability of visitor transport and facilities (see section below). Where there is a choice of routes (after taking into account all the key principles in chapters 4 and 5 of the Scheme), we favour the one that is accessible to the widest range of people or most easily adapted for that purpose.</i></p> <p><i>Throughout the trail, we avoid creating any unnecessary new barriers to access by choosing the least restrictive infrastructure that is practical in the circumstances.”</i></p> <p>Natural England can confirm that we have adhered to this guide in developing our proposals in report AHS 4: Southwold to Pakefield. The framework within which Natural England deliver the KCIIIECP does not give us the scope to put in place diversions from the main route where it's not suitable for mobility scooters, in order to enable them to continue along the coast. The Disabled Ramblers can however explore this idea with the Access Authority, Suffolk County Council, to see if it can be achieved as part of future route enhancements.</p>	