

**APPLICATION FOR A DEVELOPMENT CONSENT ORDER BY NNB GENERATION COMPANY (SZC)
LIMITED FOR THE SIZEWELL C PROJECT, SUFFOLK
REF. EN010012
WRITTEN REPRESENTATIONS OF THE RAMBLERS ASSOCIATION – SUFFOLK AREA
REGISTRATION ID: 20026002**

1. Introduction

- 1.1 The Ramblers' concerns are about the effect of the proposed development on:
- 1.2 footpaths and other ways over which the public have a right of way or access on foot
- 1.3 the beauty of the countryside
- 1.4 what improvements will be made to the existing network of rights of way through planning gain and through the legacy left by the construction works.

2. The Ramblers

2.1 The Ramblers is a registered charity and company limited by guarantee, founded as a voluntary body in 1935. Its objects are to promote the health, recreation and environmental benefits of walking, especially by protecting and extending the network of public paths and access in town and countryside, and safeguarding the countryside and open spaces so that walkers can enjoy their tranquility and beauty. We have about 105,000 members throughout England, Wales and Scotland. Our Suffolk Area has about 1700 members.

2.2 Our goal of promoting walking extends to walking for the purposes of everyday transport, not just for recreational purposes, though often the two will overlap. Encouraging people to walk for short routine journeys, including walking to reach public transport links, benefits the environment by keeping cars off the roads, and benefits individuals and the nation by keeping people fitter. Direct off-road paths encourage more people to walk, providing the incentives of convenience and the delight of not walking alongside road traffic, with its attendant noise and fumes and potential danger.

2.3 For completeness we mention that our charitable work includes the promotion of walking for health. Since April 2012, through our partnerships with Macmillan Cancer Support and Sport England, we have been running the Walking for Health project, delivering strategic guidance for the England-wide health walks programme and providing schemes with such support and free resources as training, insurance, and national

promotion. (The local schemes are run by a variety of organisations including councils, the NHS, charities and voluntary groups.)

2.4 In addition to supporting Walking for Health walks, we organise 45,000 led walks per year. 12,000 volunteers lead the walks; about 300,000 people take part in them. We have been organising these led walks since our formation in 1935.

2.5 For these things and for the public in general, good walking infrastructure is important. Hence our ambition to ensure that everywhere there are paths which encourage people to walk, that the right infrastructure is in place, and that resources are provided so that everyone can enjoy the outdoors on foot.

2.6 It may assist if we add something about the Ramblers' policy in respect of diversions and other changes to the network. The Ramblers is by no means opposed to all diversions of public rights of way. Since 1 March 1983 the Ramblers' has been an organisation prescribed to be notified of all changes, proposed and actual, to the public rights of way network under the main provisions. The records we keep show that about 80% of diversion proposals are confirmed and brought into effect without objections (or with objections withdrawn, if any were made) from any party, either the Ramblers or anyone else. So the objections mentioned below are not the unconsidered reactions of an organisation wishing to preserve the network from any sort of change.

2.7 We recognize that it is possible that a diversion can improve a route; and it is Ramblers' policy to accept a diversion in some circumstances even if it is less satisfactory than the original route provided the new alignment is only marginally less satisfactory. An increase in its length is by no means *per se* an adverse factor in a diversion if the route's use is primarily recreational. It can be a positive expansion of the available network, provided the gradients, surfacing, and views are roughly the same or better. We acknowledge that there can be an element of subjectivity here: but then, the legislation most commonly used for the diversion of public rights of way allows for subjectivity, requiring an Inspector, in deciding the expedience of confirming a public path diversion order under section 119 of the Highways Act 1980, to have regard to the effect that a diversion would have 'on public enjoyment of the path or way as a whole'. But with a path which is used less for recreation than for routine everyday transport, say as a local short-cut for residents to get to shops or a bus-stop or other amenities, significant extra length can result in them taking the car instead, or walking less frequently. And even on a route used purely for recreation, a general sense of directness can be one of the pleasurable perceptions of using a route, especially where it gives the user a sense of using a route which historically has been used by locals as a desire-line between one point and another; substitution by an artificial 'dog-leg' diversion can extinguish this perception.

2.8 Purely to illustrate this (we do not for one moment presume to suggest that one Inspector's decision is somehow binding on another Inspector) we quote briefly from a very recent decision by an Inspector in such a matter. This was in connection with diversion orders under section 119 of the Highways Act 1980 made in respect of paths on the playing-fields of Harrow School. In that matter, objections had included the undesirability of a zig-zag route replacing a direct one, and the loss of sense of walking an old-established route. The Inspector generally accepted both matters as relevant factors.

"A number of objectors referred to the straightness of the route. Ms Lloyd [objecting] stressed the importance to her of walking in a direct line to her destination and Mr Catherall [objecting] said that he 'would not want to walk at 90 degrees to my destination.' I agree that on reaching Point B the natural desire is to continue in a straight line towards Point A, not to turn away towards Point C. The straightness of the route gives walkers a sense of purpose which is lost on a route which turns at angles to avoid modern, man-made features."

2.9 The Inspector also expressed the view that 'in my opinion the fact that the route leads in a straight line towards an obvious historic destination, with a clear view of that destination, adds considerably to the enjoyment of the route.' This was in broad agreement with objectors' contentions that the path was '... clearly an ancient route: it can be traced back to the early nineteenth century at least, when it connected Sudbury to Harrow-on-the-Hill in an almost straight line.... The diversion will result in a loss of historic continuity. Walkers appreciate that they are following an ancient route and the knowledge of the history adds to their enjoyment of the path'. Ms Lloyd stated that she had a strong feeling of historic continuum in walking paths used for generations and had a desire to preserve them for others. Councillor Anderson stated that FP57 was an important historic path linking Sudbury to the church and school which are historic sites and that these historic links are important to many residents. The Council describes the route as 'in existence historically over hundreds of years.'

2.10 We reiterate that we do not quote this as if we think it sets some sort of precedent, since it does nothing of the sort (it is not even the same provision); but we think these observations by users of paths and an Inspector are useful recent illustrations of our point: that in a recreational walk, though extra distance may not necessarily be a negative factor and in fact can be a positive one, general directness along natural desire-lines is to be preferred over unnatural 'dog-leg' diversions. Making people go significantly out of their way may make them abandon the idea of walking a particular route altogether.

3. Health and economic benefits of walking, and of encouraging people to walk

3.1 Walking benefits walkers. There is increasingly strong evidence of the health-benefits of walking. For example: the fact that brisk walking improves circulation and the performance of the heart and lungs. Walking can lower blood-pressure; it can reduce risk of stroke, and of heart disease, the UK's biggest killer. It can improve control of blood sugar in type-two diabetes; it has an important role in cardiac rehabilitation. And walking promotes mental health and well-being, and improves self-perception and self-esteem and mood; it has the potential to be as effective as anti-depressants or psychotherapy in treating depression. Widespread take-up could massively lighten the economic burden caused by physical inactivity (in 2009 each Primary Care Trust spent an average of £5m on dealing with its consequences).

3.2 There are economic benefits as well. We refer to the 6.14 billion pounds which walkers spend annually in the English countryside, the income in excess of 2 billion pounds which they generate, and the 245,000 full-time jobs which they support.

3.3 So an increase in walking in the country can reduce the nation's health-bill and boost the rural economy.

3.4 There is thus a need for a path network which encourages the activity: a network which connects people with their communities and their local amenities, with their history and with the wider natural environment.

4. Particular matters connected with the danger of walking on roads

4.1 In at least some instances (unless resolved by negotiation before any inquiry takes place), the alternative route users would need to take will involve them walking on a road without a footway.

4.2 Walking in a country lane (say to get from one field-path to another, or where there is a general scarcity of field-paths) could at one time have been a pleasurable activity. The hedgerows (and verges, if any) beside lanes sometimes have varieties of wild plants not seen in fields, where they are seen off by the plough, or agri-chemicals. A quiet country lane once evoked the horse-and-cart era. Nowadays the approach of a motor vehicle dispels any idyllic association with the hay-wain. Some motor-vehicles are too large for lanes which existed before the age of lorries and milk-tankers, but they still use them. And some cars, perhaps most, go at speeds which either endanger vulnerable road users or put them in fear of danger. We try to expand on this point below.

4.3 To our aims, the safety of pedestrians on roads is an overarching issue. 'Safety' encompasses three concerns. The first is that it is dangerous to walk on roads with no

footway. The frequency of vehicles is unpredictable; so is the speed and care or recklessness of the drivers. Secondly, even if it could be guaranteed (which it cannot) that all the drivers on a particular stretch of road will go at a safe speed and treat vulnerable road users like pedestrians with care and respect, some pedestrians will not believe this will happen and so will abandon the idea of walking on that stretch. Thirdly, though pedestrians have a perfect right to walk in the roadway, equal to that of motorists to drive in it, most motorists evidently do not expect to find pedestrians on roads and some react with surprise, astonishment or anger at finding their progress incommoded by them. The occurrence or prospect of the occurrence is off-putting to pedestrians, whatever they know their rights to be. Some pedestrians feel awkward or embarrassed at making drivers slow down or stop; some feel threatened by the speeds or the demeanour of some of the motorists; and ultimately whatever the legal position the pragmatic solution for pedestrians has to be to avoid situations where they may be in conflict with vehicle users. Anyhow, being passed by vehicles going at speed only inches away in a narrow lane is unpleasant or alarming, by any measure.

The Kettering tragedy

4.4 At the Ramblers we have not forgotten the evening of Thursday 20 May 1976. That evening, 28 members of the Kettering Rambling Club made their way along a quiet country road towards the village of Rushton, in Northamptonshire. Taking part in a led walk organised by the association, they were walking tight in to the verge and correctly on the right hand side of the road to face on-coming traffic, in accordance with the Highway Code.

4.5 Suddenly there came into view, over the brow of a hill, a Ford Cortina travelling at 55–70 mph. Perhaps its driver was forgetful of the Highway Code's Rule, 'Never drive so fast that you cannot stop well within the distance you can see to be clear.' At all events, while swerving to avoid an on-coming vehicle, it hit the walkers instead.

4.6 The car killed five of our members on that quiet road: George and Nance Hall, and Mary Dodsworth, and Muriel Small, and Reg Groome.

As the first pair of Ramblers were some 20 yards from the brow of the hill, Susan [Askew, one of the walkers, who was walking with her husband and mother] saw it: 'The car appeared to be on the wrong side of the road . . . my immediate reaction was that it was going very fast, about 60 miles an hour.... He skidded down the road towards us.' Then she moved. She ran, and seconds later the car, a bronze Ford Cortina, clipped her jacket as it went past. It then mowed down the five people immediately behind her....

Michael Askew shouted at Susan to stay where she was. 'I could see four bodies in the ditch and I recognized Susan's mother. I could see she was breathing but unconscious and that there was nothing I could do.' A fifth person across the road was already being

covered with ramblers' brightly covered anoraks.

Two Ramblers were dead by the time the ambulances came. Three died in Kettering General Hospital a few hours later.

4.7 Despite findings that it was the driver who was at fault and that the Ramblers were following the Highway Code, following this tragedy 'A police statement described organized walks on public roads as "downright dangerous" and were to be deplored, particularly if they were in country lanes.' The Ramblers tried to get Northamptonshire police to withdraw their statement. The police conceded that pedestrians had as much right as motorists to use a public highway; but beyond that they would not go. The coroner urged the jury to make a finding of accidental death and to make the recommendation that all ramblers, when walking on roads, should send someone ahead 'at blind corners' to warn motorists of the advancing party of walkers. Dutifully the jury did both things (without saying what protection there would be for the one who went ahead to give the warning, or for solitary walkers generally).

4.8 Overall, the attitude of the authorities was that though the motorist was in the wrong, to some extent the ramblers had only themselves to blame for being the ones who were walking in the lane in the first place.

Increase in speeds of vehicles

4.9 The road-holding capacity of cars has increased since that tragedy, and so have the speeds they travel at, in consequence. For a walker on any road now it is not uncommon to be passed by vehicles travelling at speeds in excess of 60 mph, worrying enough when on a footway; but thousands of miles of country roads have no footways, and pedestrians must walk in the carriageway with cars inches away.

4.10 Even if it should be shown that figures for pedestrians being hit by vehicles on rural roads have decreased in recent years, we believe that this is attributable more than anything to people being deterred from walking on them in the first place, for fear for their safety. It remains an off-puttingly frightening experience for a pedestrian to be routinely passed on a country road by a car inches away going at 60 mph, and this arrangement needs to be ended if people are to be encouraged to walk.

4.11 The Ramblers is aware that there is much 'suppressed demand' for walking on rural roads. Above we have referred to the road-holding properties of modern cars which allow high speeds even on winding lanes. Developments in technology such as Sat-Nav allow the increased use of country roads by drivers previously unfamiliar with them. These changes have left potential walkers fearful for their safety. The result is the suppression of a sustainable form of transport (as well as of recreational walking), and roads appear statistically safer than they are because people are afraid to walk on them.

People are increasingly thinking that the only safe way to be on some rural roads is in a vehicle.

4.12 The Campaign to Protect Rural England's 1999 Rural Traffic Fear Survey showed that two-thirds of people feel threatened by motor traffic all or some of the time on rural roads. Small wonder CPRE coined the expression, 'traffic intimidation' —

'In [country] lanes cars seem to assume that no one else uses the road ... and so drive as if on an empty race track' (respondent from Surrey)

'It is dangerous to walk to neighbours or to the post box even in daylight' (respondent from Essex).

It concluded that as well as the obvious implications for road safety (most fatal car accidents occur on rural roads) speeding traffic affects everyone's quality of life. The opportunities for people to walk, cycle or ride in the countryside are curtailed while dependency on the car for short trips is increased. The young and the old are particularly vulnerable.

4.13 And Chapter 3 of the Department for Transport's Personal security issues in pedestrian journeys points up these concerns. Observations by participants in the focus group speak for themselves —

'cars go so much faster along side-roads and little roads these days, much faster than they used to ... there's a general disregard for speed compared to ten years ago' [woman in urban group]

'the countryside has changed. There is a lot more traffic and it travels very much faster ... one of the differences with the village now is that we get a lot of cross commuting ... people driving to and from Exeter to work' [man in rural group]

'what really puts me off walking during the day is the traffic and especially the large lorries ... we are getting much larger lorries coming through the village, some even with trailers...' [woman in rural group]

'the scale of farming has changed. In the past, produce like potatoes or milk was picked up in much smaller containers ... but now it's all in much larger containers and much larger lorries.... They have to go through the village which was never made for them ... there should be a length restriction really' [man in rural group].

4.14 The survey with parents at a rural school on their journey to school revealed the

perception of added traffic dangers from inconsiderate motorists driving too fast along narrow country roads: 'the biggest problem for a child walking to school where there are narrow roads and no pavement or path is the lack of awareness by motorists. Most display a total disregard for pedestrians, crossing the road is very difficult. Car drivers tend to see other cars but they forget about pedestrians.'

Particular issues facing vulnerable road users

4.15 That last observation points up the fundamental problem about the dynamic between drivers and pedestrians. The fundamental problem is that it is not widely understood among drivers that pedestrians have a right of way on roads and it is not subservient to any rights the motorists have. If you are on foot it is sensible to use the footway. Vehicles are forbidden to go on it, so pedestrians are generally safe when walking along a road if they remain on the footway.

4.16 Nobody likes walking on roads or lanes nowadays, but there is often no alternative. For a walker, whether a recreational walker using a stretch of carriageway because there is no off-road route or a country-dweller in an outlying house walking into the nearest village to buy a loaf of bread, it can be a frightening experience to be passed by vehicles travelling at 60mph only inches away. The Ramblers have it on good evidence (see, for example, CPRE's 1999 Rural Traffic Fear Survey, referred to above) that people's right to walk on roads is being suppressed by this arrangement, along with their desire to walk at all.

4.17 But the issue is compounded by the fact that many drivers appear not to understand that people have the right to be on roads on foot as well as they have the right to be on them in a vehicle. It is frequently nowadays the experience of walkers, whether solitary or in groups large or small, and though walking correctly on the right-hand side of the road facing the vehicular traffic, to have horns sounded at them in angry fashion or to receive gesticulated or verbal disapproval or abuse. It looks as if many motorists think that it is the duty of pedestrians to keep out of their way at all times, when in fact it is the duty of the driver to treat a pedestrian walking along the carriageway with no less consideration and courtesy and respect than as if it were another vehicle.

4.18 Here are a few small illustrations of the widespread misunderstanding in this matter on the part of drivers. On 9 May 2009 the publication of a Government consultation on road safety was reported in The Times; the paper had an online 'Have your say' site, to which was made the following contribution:

"If you [as a pedestrian] are hit on the road, what on earth were you doing there?"

which glaringly reflects the misunderstanding that pedestrians have no business on roads even though you have to walk on roads where there is no footway. So did the comment, in a similar web-article (The Times, 16 May 2008),

“What are pedestrians doing on the road to be hit by a car at any speed? Drivers hitting pedestrians on pavements, crossings, etc should be prosecuted to the limit of the law—agreed. Pedestrians being hit otherwise should be treated likewise, in the event of their survival.”

4.19 Not even elements of the motor-industry appreciate that pedestrians have rights on roads. On 27 June 2003 The Times, in an article entitled ‘Car makers have blind spot for pedestrians’, reported that

“a Toyota spokesman said that poor road design was to blame for many pedestrian casualties, adding: ‘Pedestrian protection is very important to us, but we also need to educate pedestrians not to be in the road in the first place’.” [Underlining added.]

The Toyota spokesman did not explain how pedestrians are supposed to exercise their right to walk along the thousands of miles of rural roads with no footway. Neither did a subsequent correspondent, who wrote that:

“the Toyota spokesman seems to have worked it out. Remove anyone from the roads who isn’t in a car. Simple really.” [The Times, debate@thetimes.co.uk, 2 July 2003].

4.20 If a spokesman for the motor-trade and the apparently-qualified drivers articulate and intelligent enough to get themselves on to the Times letters page cannot understand the law relating to pedestrian use of roads or that non-motorised users have rights, what a saturation of misunderstanding there must be among thousands of motorists on this point. Small wonder that people who try to walk on roads report intolerance and abuse from motorists.

4.21 So, people are increasingly thinking that the only safe way to be on some rural roads is in a vehicle. We believe that this has led to fewer and fewer journeys in rural areas being taken on foot, more people considering it safer to drive for even short distances and for everyday errands and journeys than to walk. Any consequent reduction in casualty statistics may give the impression that the roads are somehow becoming safer, and that it is therefore acceptable to make people walk on them.

4.22 The Ramblers submits therefore that because of the real danger, the perceived danger, and the awkwardness walkers may feel at making obliging motorists slow down and stop (and at the head-shaking and other gestures and hooting or abuse from the less obliging ones), making people walk on roads with no footway can never be seen as an acceptable course of action. The ability of drivers to drive safely is not a ‘given’; and you

can never be sure that the one coming at you is safe and considerate.

5. General principles which the Ramblers say should apply to all the proposals to divert public rights of way

5.1 The Ramblers submits that all new public rights of way must be adopted by the highway authority for maintenance purposes, and that the highway authority is suitably recompensed by the party requiring the diversion for additional costs incurred in, for example, grass cutting, maintenance of steps, repair of fences, or other maintenance costs, by way of commuted sum payments. Diversions involving underpasses or bridges in the proximity of watercourses are acceptable only where risk of flooding is very infrequent.

5.2 All new rights of way should be shown on the definitive map and statement.

5.3 In no case should an alternative route include stiles or other impediments to use by people with mobility problems.

5.4 Any new field-edge paths in urban or village environs should have permanent firm grass surfaces.

6. Response by the Ramblers to specific proposals

6.1 Effect on the Beauty of the Countryside

We oppose the development and consider that the siting of the proposed power station is wholly inappropriate in an Area of Outstanding Natural Beauty.

The huge disruption to a beautiful area will last for nearly a generation and is wholly unacceptable.

6.2 Effect on the existing public rights of way (PROW) network

The following comments are made by reference to the maps contained in section 2.4 of Book 2 accompanying the application "Access and Rights of Way Plans".

In the pre-consultations the applicants said that appropriate solutions identified with the assistance of SCC and Suffolk Coastal District Council (SCDC) prior to submission of an

application for development consent. Such solutions are likely to include the provision of gates or stiles or possibly footpath diversions where necessary. Chicane-barriers must be erected where sections of path terminate at the new roads. Central refuges in the carriageway must also be provided and warning signs of pedestrians crossing with appropriate speed restrictions. Without these additional measures the effects could be significant. Stiles are not acceptable. Self-closing kissing gates are the modern preferred method.

All new footpaths must become the subject of creation orders adding them to the Definitive Map.

Sheets 1 and 2

We welcome the proposed new footpath running parallel to and to the east of the U2831 from TM 4532 6530 southwards to the new roundabout provided that it is situated inside the hedgerows and that when laid it shall be the subject of a creation order adding it to the Definitive Map. The footpath should extend northwards into East Bridge village.

Sheet 2

We welcome the proposed new footpath running parallel to and to the west of the B1122 from the new roundabout southwards to the new intersection with the U2822, again provided that it is situated inside the hedgerows and that when laid it shall be the subject of a creation order adding it to the Definitive Map.

Sheets 2 and 3

We welcome the proposed new footpath running parallel to and to the south and west of the U2822 (Lovers Lane) provided that it does not immediately abut the carriageway but is at least 5 metres from it and that when laid it shall be the subject of a creation order adding it to the Definitive Map. A safe means of crossing the U 2822 must be provided at TM 4557 6331, a zebra crossing as a minimum.

We welcome the proposed new footpath running on the north-west side of the U 2822 provided that it does not immediately abut the carriageway but is at least 5 metres from it and that when laid it shall be the subject of a creation order adding it to the Definitive Map.

Sheet 6

Sea Wall and the England Coast Path

We share the concerns of others regarding the disruptions to what will become part of the England Coast Path, a national trail being established under the Countryside and Rights of Way Act 2000. We are pleased to see that on closure of Leiston Footpath 21 a very close alternative will be available at all times.

We note the plans to construct a significant bank on the seaward side of the site and the remodelling that will take place. The Coast Path will run to the seaward side of this bank. We are concerned at the resilience of this path over time and the effects that coastal erosion may have upon it. Enforceable measures must be imposed to ensure that the Coast Path will be maintained and protected for at least the existence of the development.

Sheet 8

The temporary closure of the level crossing at TM 4058 6395 can be tolerated if it is for a short period enabling the replacement track to be laid.

Sheet 10

The temporary closure of the railway footbridge at TM 4394 6293 can be tolerated if it is for a short period enabling the replacement track to be laid.

It is perceived that the temporary closure of Leiston Footpath 6 could be for a considerable time. The map key does not indicate what the small red dots going south from TM 4412 6396 represent. It is difficult to see why this section of path would need to be closed. The alternative offered entails some 0.56 of a mile extra walking. If this temporary closure is for no longer than two months to enable new track to be laid it will be tolerable in view of the provision of the new permanent footpath between TM 4405 6371 and TM 4447 6370. When laid, this new path must be the subject of a creation order adding it to the Definitive Map.

Sheet 15

The position of Darsham Footpath 2 is not shown on the map. This path meets the A12 at TM 4112 7064. Provision must be made for safe passage from that point to Willow Marsh Lane. Permanent provision for such passage should be made a legacy of the development with a safe pedestrian crossing of the A12.

Sheet 16

The Map does not show the position of Hacheston Footpath 16 which comes out onto the south-eastern side of the A12 immediately opposite Hacheston Bridleway 8 which is shown. The opportunity must be taken here of including in the work the reinstatement of safe connectivity between Hacheston Footpath 16 on the south-eastern side of the A12 with Hacheston Bridleway 8 and Hacheston Footpath 7/Marlesford Footpath 8 on the north-western side by means of a subway, a footbridge or a safe crossing at grade.

Sheet 17

A safe means of crossing the new course of the A12 must be installed to connect Tinker Brook with the unclassified road meeting the A12 from the north at TM 3526 5977. This must be by means of a subway, a footbridge or a safe crossing at grade with a central refuge.

It is assumed that the new route of Farnham Footpath 1 to cross the new route of the A12 will be a subway or a footbridge. Nothing less will be acceptable at this point.

No provision has been made for the safe pedestrian crossing of the new route of the A12 between the severed parts of the C211 at Pond Barn. This must be addressed by the provision of a subway or a footbridge. Nothing less will be acceptable at this point.

Sheet 18

The Map Key gives no indication of why the Farnham Footpath 3 has been overlaid with a continuous red line. This path must be retained. The route of the new permanent section over the new carriageway of the A12 is acceptable provided there will be a subway or a footbridge. Nothing less will be acceptable at this point. The new bridge or subway will also carry the diverted Farnham Footpath 4.

The route of the new permanent section of Benhall Footpath 29 over the new carriageway of the A12 is acceptable provided there will be a subway or a footbridge. Nothing less will be acceptable at this point.

Friday Street north-east of Farnham

The road improvements should include the creation of a footpath along the existing track from the Friday Street Farm (TM 373 602) to the junction of footpaths 137/029 and 243/006 at TM 370 602 which Ordnance Survey Maps of 1904 show to have been a carriage road.

Sheet 19

The route of the new permanent section of Kelsale Footpath 1 over the new road is acceptable provided there will be a subway or a footbridge or a safe crossing at grade with a central refuge.

The route of the new permanent section of Kelsale Footpath 13 and Yoxford Footpath 16A over the new road is acceptable provided there will be a subway or a footbridge or a safe crossing at grade with a central refuge.

Sheet 20

The route of the new permanent section of Yoxford Footpath 16/Middleton Footpath 14 over the new road will not be objected to provided there will be a subway or a footbridge or a safe crossing at grade with a central refuge.

The new footpath replacing the severed section of Littlemoor Road will not be objected to provided there will be a subway or a footbridge or a safe crossing at grade with a central refuge. This crossing and the additional new sections of path will also link the severed sections of Fordley Road which will not be objected to.

The route of the new permanent section of Middleton Footpath 17 over the new road will not be objected to provided there will be a subway or a footbridge or a safe crossing at grade with a central refuge.

The proposed work should include the making a footway alongside of the B1122 between

Mill Street and Middleton Footpath 17 at TM 4175 6736.

Sheet 21

The route of the new permanent section of footpath connecting Middleton Footpath 23 with Title Road over the new road will not be objected to provided there will be a subway or a footbridge or a safe crossing at grade with a central refuge

The route of the new permanent section of footpath connecting Middleton Footpath 20/Hawthorn Road with Middleton FP 16 over the new road will not be objected to provided there will be a subway or a footbridge or a safe crossing at grade with a central refuge.

The proposed new permanent connecting paths between the severed parts of Middleton FP 15 entail some third of a mile extra walking. However, this will not be objected to. It is assumed that the loop in the alternative route is for the ramping necessary to gain a bridge across the new road. If this is not to be a bridge it must be a subway or a safe crossing at grade with a central refuge.

Sheet 22

The routes of the proposed new permanent sections of footpath connecting the severed sections of Theberton Footpaths 3 and 4 over the new road will not be objected to provided there will be a subway or a footbridge or a safe crossing at grade with a central refuge.

The reconfiguration of Theberton Footpath 7 at its southern end would not be objected to and the conversion of the section of the B1122 south of Onners Lane to a public footpath will be welcomed subject to, when laid, it being the subject of a creation order adding it to the Definitive Map. A footway must also be provided linking Onners Lane with Theberton Village.

In view of the heavy increase in traffic along the carriageway of the B1122, a pedestrian footway must be provided between the points TM 4456 6481 and TM 4446 6492 to

facilitate safe pedestrian passage between Theberton Footpaths 11 and 12 and Potter's Street.

Sheet 25

The improvements to the A12/B1119 junction, must include provision for the safe connectivity between the severed sections of Saxmundham Footpath11. As mentioned below in our submissions for improvements by way of planning gain, the path crosses the A12 at an oblique angle requiring the walker to walk some considerable distance alongside the carriageway in order to cross the it at a right angle.

Sheet 26

A1094/B1069 south of Knodishall

Improvements here should include a safe pedestrian footway alongside of the A1094 between Sloe Lane (TM 430 589) and Blackheath Corner (TM 419 593) with a safe pedestrian crossing facility and central refuge over the A1094.

Sheet 27

A safe pedestrian crossing facility over the A12 with central refuge should be installed at TM 4139 7123 to provide safe connectivity between Darsham Footpath4 and the footway on the eastern side of the A12.

Other aspects not covered by the numbered sheets

A12 Saxmundham bypass - There will be much increased traffic volumes along the A12. Some of the existing foot crossings are extremely dangerous. These dangers must be minimized either by the substantive development or through planning gain. Please see details in our comments below on Planning Gain.

The Sandlings Walk, a long distance route between Eastbridge Road and the Suffolk Coast Path (another long distance route following the coastline and passes through the main development site).

The existing permissive path network through Kenton Hills and Sizewell Belts should

remain open. A new replacement link to the coast path should be provided along a more northerly route through the development site.

These paths should become permanent public rights of way and be the subjects of creation orders adding them to the Definitive Map.

7. Planning Gain

In view of the huge scale of this development, in the event of the application being successful we will expect proportionately huge planning gain to come out of it.

We have identified the following improvements needed to the Public Rights of Way network in the surrounding district. The creation of new paths to give effect to these improvements and all necessary landowner compensation should be financed by way of s. 106 gains. Some of these improvements have been suggested as planning gain in our responses to the applications for East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm, references EN010077 and EN010078.

The improvements will enhance the coastal footpath network which is increasingly a reason for tourists to visit our Area of Outstanding Natural Beauty. Some of these would lie along the route of the planned England Coast Path which, in its complete form, should run along both sides of estuaries as far as the first permanent crossing (e.g. Snape Bridge). Soon there should be a continuous stretch from Berwick-on-Tweed and it is likely that many walkers will wish to continue their travels on foot by continuing through Suffolk to Essex and beyond.

1. The Sailors' Path. This path forms most of the section of the Suffolk Coast Path recreational route between Snape Maltings and Aldeburgh Town and is likely to become the route of the England Coast Path, a national trail being established under the Countryside and Rights of Way Act 2000. In addition to local amenity and an essential link in the Suffolk Coast Path this route also features in the East Suffolk Lines Walks project promoted by the East Suffolk Lines Community Rail Partnership. The whole Suffolk Coast Path route links Felixstowe and Lowestoft. Until very recently, there was no safe link at the Aldeburgh end between the small car park at TM443581 and the start of the pedestrian footway on the A1094 at TM448577. Walkers using the route were expected to walk in the carriageway. The A1094 is a fast and dangerous road for the walker after it leaves the 30mph limit. The grass verges are narrow, sloping and uneven. They have regular drainage channels cut into them and are totally inadequate for walking. The problem has been temporarily rectified in that Suffolk County Council have secured a licensed path from the owners of the Aldeburgh Golf Course. However,

this is understood to be a ten-year agreement only and a permanent right of way is required. The verges on the southern side of the road fronting the gardens between the Golf Club and the small car park also need dedicating. All this requires potential payment of compensation to the landowners and would incur considerable legal and administrative costs which the County Council cannot afford to pay from its present budget.

2. The Aldeburgh-Thorpeness railway trackbed. This forms part of much walked circular routes taking in Aldeburgh, Thorpeness, the Aldringham Fen and Aldringham Walks. It also presents for walkers and cyclists a safe alternative to the B1122 which is a fast and extremely dangerous road and the only other direct link between Aldeburgh and Leiston. Much of the track bed appears to be in private ownership but is open, presumably as a permissive path. Permissive paths are unsatisfactory because the permission can be withdrawn at any time. Again, proper Creation Agreements or Orders should be funded to secure the route permanently. An ideal solution would be for a bridleway to be created over the track bed as this would provide a multi-user facility for walkers, horseriders and cyclists. Again, this may entail the payment of compensation to the landowners and would incur considerable legal and administrative costs.

3. River Wall - eastern side of Butley River. The path along the river wall between the points TM393505 and TM396485 must be added to the Rights of Way Definitive Map. Its omission could simply be an anomaly as the route recorded on the Definitive Map as Chillesford Footpath 18 stops abruptly at the Chillesford/Gedgrave parish boundary which is absurd. The proper recording of this route would enable a fine circular walk linking Chillesford and the Butley Ferry. Again, this could entail the making of creation orders or agreements and the payment of any compensation to the landowners and would incur legal and administrative costs which could be funded by planning gain.

4. River Wall - Butley Ferry to Tide Gauge (TM393481 to TM415484). This is another section where there is no apparent reason for the route not to be recorded on the Definitive Map. It is freely used (possibly on a permissive basis) but is another instance where a Creation Order or Agreement should be funded.

5. Alde River wall east of Iken Church (TM412567 - TM443556) - This is another section of river wall that should be opened to the public as a public footpath to link Iken Church with Public Footpath Iken 7. We are recommending to Natural England that it becomes part of the England Coast Path.

6. Cliff-top path Thorpeness to Sizewell (Aldringham-cum-Thorp footpath 31) - There are some serious incidents of erosion along this path which have caused the Suffolk Coast Path recreational route to be re-routed. The path affords outstanding beautiful views. Strengthening work needs urgently to be carried out just to the south of the junction with footpath 32 (TM475616) where the path edge is falling away. Footpath 31 seems now to have been lost between points TM474599 (Old Homes Road) and approximately TM476604. The footpath below the cliffs (footpath 33) is also impassable at high tide in the vicinity of TM475601 where gabions have been installed. This part of the problem is eased by the fact

that people have for many years been able to walk freely over the grassland between Thorpeness Common and the cliffs and along the existing tracks to reach Byway 20 or North End Avenue, Thorpeness. However, this area is not recorded as Access Land nor are there any public rights of way over it recorded on the Definitive Map. Creation of permanent rights of way over these tracks should be funded to enable signage to be installed and them to become part of the Suffolk Coast Path recreational route.

7. Reckford Bridge – A public footpath of 0.12 mile between Reckford Bridge (TM436677) and the start of Black Slough (TM438679) must be created inside the hedges of the farm land to provide a safe alternative to walking along the busy carriageway of the B1125 between Public Footpath Westleton 25 and Bridleway Westleton 26 and enable valuable circular walks around Middleton, Eastbridge, Minsmere and Westleton to be walked safely. The danger here will be worsened even more if the B1125 is to carry construction traffic.

8. Kenton Hills and Sizewell Belts – As mentioned previously, this small network of permissive paths exists over this area should be dedicated and become permanent public rights of way.

9. Ramsholt to Bawdsey – The stretch of river wall from Ramsholt to Bawdsey on the Deben should be made available to the public to connect with existing routes and become part of the England Coast Path. This section of river wall is not currently open to the public but could be made a public footpath with a minimum of alteration and expenditure with no inconvenience to the landowners. It will have a good deal of support from local residents as well as visitors.

10. Route from Eastbridge Road to Leiston Footpath 20. – Much of this route between TM454652, through Black Walks and Lower Abbey to TM458661 is believed to be in the ownership of EDF. It is believed to have been a freely available route for walkers in the past. EDF should now re-dedicate this route as a safe alternative to the Eastbridge Road by formally dedicating a linking between Footpath 20 and Bridleway 19 at the Round House.

11. Footpath crossings over the A12 on the Saxmundham by-pass. – This is mentioned previously. There are several footpath or bridleway crossings over the A12 that are extremely dangerous for users. The road is a single-carriageway with mostly a 60 mph speed limit. It appears that little consideration if any was given to walkers, cyclists or horse riders when the bypass was built in the late 1980s. Traffic levels have increased steadily since then and construction traffic for Sizewell C would worsen the situation even more. There are no warnings to motorists of the crossings, there are no central refuges and in two instances (those at TM 376 644 and TM 375 636) the walker's task is made even more precarious by having to climb over Armco-type barriers at each side of the carriageway. At TM 375 632 the path crosses the A12 at an oblique angle requiring the walker to walk some considerable distance alongside the carriageway in order to cross the it at a right angle.

These crossings must be made easier by speed limits, warning signs to motorists,

provision of gaps in the Armco barriers and the installation of central refuges.

The improvements to the A12/B1119 junction, the subject of Sheet 25 should include the required pedestrian improvements at TM 375 632, (Saxmundham Footpath 11).

The locations of the crossings are:

TM 380 656, Kelsale Footpath 10

TM 373 646, Kelsale Footpath 38

TM 376 644, Kelsale Footpath 1

TM 375 639, Kelsale Footpath 3

TM 375 636, Saxmundham Footpath 5

TM 375 632, Saxmundham Footpath 11

TM 376 630, Saxmundham Footpath 13

TM 377 621, Benhall Footpath 22

TM 378 616, Benhall Bridleway 25

12. Pedestrian access between Aldringham and Thorpeness.– The B1353 is an important link between these two villages in the parish of Aldringham-cum-Thorp. However, it is a fast and dangerous road for those wishing to make the journey on foot. The opportunity should be taken to create adequate footways or parallel footpaths on the parts of this section of road where they do not already exist.

13. Cockfield Hall, Yoxford.– A public right of way on foot is required over the short section of driveway from the A12 at TM 3997 6906 to connect with Yoxford footpaths 10 and 13.

14. Clayhill Road, Kelsale – Safe connectivity is required along this road between the points TM 3924 6410 and TM 3965 6416 so that people can walk safely between Saxmundham Footpaths 34 and 33.

The Ramblers Association, Suffolk Area,
Part of The Ramblers' Association,
A company limited by guarantee,
registration number 4458492
Registered Charity number 1093577

Registered office address
1 Clink Street, 3rd Floor, London, SE1 9DG

Local contact:

James Richards, Footpaths Secretary, Suffolk Area

