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Your ref: **EN070009**



The Planning Inspectorate

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Dear Inspector

NSIP Reference Name / Code: H2 Teesside/EN070009
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Natural England's Statement of Common Ground (SoCG) Update at Deadline 7a

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is pleased to provide a comprehensive review of our position regarding our Key Issues (NE1-NE3#) at Deadline 7a in Appendix 2. Appendix 1 provides explanatory text detailing our position across a range of Key Issues relating to ornithological and air quality matters.

For any further advice on this consultation please contact the case officer [REDACTED] ([REDACTED]@naturalengland.org.uk) and copy to consultations@naturalengland.org.uk.

Yours faithfully

Northumbria Area Team

Appendix 1: Natural England's position in relation to Key Issues NE2, NE3, NE5, NE6, NE7 and NE28, 29,31.

NE 2: Assessment of significance of impacts on SPA bird populations - Resolved

Natural England notes the assessment undertaken in Annex J to determine the significance of the proposed works on birds using the whole site as a proportion of the SPA waterbird population. Natural England agrees with the methodology used and deems this a robust assessment on which to inform the impacts on the SPA. Please see our comments on NE Issue references 3 – 8 for more detailed comments on this.

We would like to highlight that Paragraph 2.1.1 defines the wintering period as November to February. Natural England does not agree with this definition, and we regard the wintering period as October – March. However, given the outputs of the assessment of impacts on birds, in particular Annex J, we are satisfied that the conclusions are still valid despite this, however we would advise that any mitigation or monitoring that is required during the overwintering period for SPA birds is undertaken throughout the entire winter period (October – March).

NE 3: Loss of Functionally Linked Land - Resolved

RIHRA - Section 6.2 – Permanent loss of Functionally Linked Land

We note that section 6.2 rules out the main site as being functionally linked to the SPA:

'Based on the count data and the ongoing nature of site clearance and industrial activity within Teesworks, the Applicant does not regard any of the habitats within or immediately adjacent to the Main Site as being functionally linked to the SPA. Functionally linked land is defined as being critical to, or necessary for, the ecological or behavioural functions in a relevant season of a qualifying feature for which a SAC, SPA or Ramsar site has been designated. The Main Site is the site of the former Redcar Steelworks which has been demolished and the land remediated under a separate planning consent. After remediation, the habitat will comprise of bare ground / crushed hardcore.'

Natural England disagrees with the above statement. Sectors 9, 10, 12, 14, 14,15 are used by significant numbers of SPA birds (Herring Gull – as illustrated in Table J4-3 and Table 6-1 – see below) during the wintering period (October – March) for a behaviour essential to their survival (roosting). We regard the site as functionally linked land.

We note that the Applicant has provided further assessment of this land on the integrity of the SPA bird populations in their answer to question 7 of Rule 8(3), 9 and 17 letter in their response dated 17/02/25. We agree with the conclusions made in this response and regard this issue as resolved.

We note that the Applicant provided further assessment on the loss of permanent land at Navigator Terminal (*Document Reference 8.37: Appendix 1: Assessment Of Potential Losses Of Functionally Linked Land (Fll) Within Terrestrial Habitat At Navigator Terminal*). As the area of land to be lost permanently in this area is unsuitable for SPA birds (tall sward with brambles) we agree that this loss will not be significant for SPA birds.

Temporary Loss of Functionally Linked Land

Natural England is satisfied with the information regarding temporary losses of functionally linked land and agree with the conclusion in the RiHRA and Document Reference 8.37: Appendix 1: Assessment Of Potential Losses Of Functionally Linked Land (Fll) Within Terrestrial Habitat At Navigator Terminal. We have come to this opinion based on the proposed timescales and details regarding restoration.

Restoration of temporarily lost functionally linked land

In *Document Reference: 8.26 Applicant's Response to Deadline 4 Submissions and Compulsory Acquisition Regulations Relevant Representations* ([EN070009-001654-H2T DCO 8.26 Applicant's Responses to D4 submissions and CA Reg RR.pdf](#)) we note that the Applicant states that land to be temporarily lost will be restored immediately post works and that such works should not prevent use of the land by SPA birds. Natural England is satisfied with this and advises that this is secured by appropriate DCO requirement.

NE 5, 6 and 7: Visual and noise disturbance to SPA birds

NE 5 and 6: Visual and noise disturbance to SPA birds - Construction

Overall:

Natural England is satisfied with the approach provided in Annex J and the RIHRA. This advice is based on the information provided on the phasing of the development, the analysis of bird distribution across the site in Annex J and the details provided on the use of visual screens.

Natural England notes that 3.2.23 of Annex J states that '*with mitigation applied, less than 1% of the waterbird assemblage will be disturbed in all months except in March 2027 (on the basis of the outline programme) when up to 1.13% of the waterbird assemblage could be disturbed*'. Whilst Natural England is satisfied with the overall methodology and approach of Annex J, and that with mitigation it is possible to rule out significant impacts on most months, we note that more 1.13% of the SPA waterbird assemblage will be subject to disturbance which is unmitigated for. This includes more than 1% of the SPA's redshank population. Despite this level of disturbance, Natural England agrees with the conclusion of the RIAA that this will not result in AEOI alone due to the following factors:

- The duration of when more than 1% of the SPA waterbird assemblage will be disturbed is limited to one month.
- The month when this disturbance will occur is March 2027 – which is at the end of the wintering period and unlikely to experience freezing conditions during which the birds will be under most stress.
- The nature and scale of the works and the predicted noise levels.

We note the Applicant's commitment to further noise reductions of up to 10db from plant equipment at the detailed design stage once the plant equipment and mitigation measures can be confirmed (paragraph 2.5.4 of Annex J). Natural England welcomes this, and this approach to avoid impacts on SPA bird populations in general across TESSIDE and advises that this is secured in the CEMP and DCO wording. We would like to request to be consulted on the final CEMP and mitigation for noise and visual disturbance of bird populations.

In our discussions, the Applicant has committed to a monitoring of bird populations. We advise that this includes monitoring during the construction phase and post construction, in order to

determine the effectiveness of the mitigation and whether any changes are required. We advise that this is secured within the CEMP, and that we are consulted on this.

We have come to the above opinion based on the details provided within the Phasing plan (Chart 1: Indicative Outline Construction Programme), Annex J (Assessment Of Impacts Upon The Waterbird Assemblage Of The Teesmouth And Cleveland Coast Spa/Ramsar Accounting For Project Works Phases) and Annex K (Response To Natural England Relevant Representation Ne5 Regarding Lamax). If these details are to change we request to be consulted on such changes as this change the conclusion of the RiHRA and the scale of impacts on SPA bird populations.

Other comments:

Habituation to disturbance

We note that in the RiHRA and Annex J, habituation to current sources of noise and visual disturbance by SPA birds is provided as justification as to why the predicted activity from the construction phase of the project will not result in harmful effects on bird populations (e.g. 6.4.10, 6.4.29 and 6.4.31 of RiHRA). Natural England does not accept this justification. Whilst we agree that some bird species can habituate to sources of disturbance, we require demonstration on how the predicted noise and visual disturbance will be comparable to those currently tolerated by SPA bird populations.

NE 5: Operational noise levels

We note that 6.7.0 of the RiHRA states that predicted operational noise levels will not exceed 60db outside of the main site. Natural England accepts that this level of noise disturbance is acceptable, given that the areas of land used in significant numbers by SPA birds (e.g. Bran Sands Lagoon) are not to experience noise levels greater than 55db. Based on this, Natural England agrees that noise disturbance during the normal operational phase of the development can be ruled out.

Natural England notes that there is a possibility for noise/ visual disturbance during any maintenance/ repair works, especially on the Above Ground Infrastructure (AGI) Sites (e.g. the AGI adjacent to Bran Sands Lagoon). Such works have the potential to exceed 55dB in noise, especially if works require the breaking of concrete. We therefore advise that a DCO requirement is put in place to consult with Natural England on maintenance/ repair works on areas outside the main site to determine the potential for bird disturbance and any avoidance steps or mitigation required. We would be pleased to work with the Applicant on best practice principals which could be adopted for maintenance and repair activities to avoid disturbance on the SPA bird populations. Given that the SPA is designated for breeding avocet, which are protected under Schedule 1 of the Wildlife and Countryside Act, such steps will be required for works in areas where breeding avocet are present regardless.

We have come to this opinion based on the information provided in the RiHRA and Annex K. If predicted activities or equipment utilised during the operational phase is to change then we advise that noise levels are modelled so impacts on SPA birds can be reassessed and any required mitigation put in place. Natural England requests to be consulted on any such change.

In addition, we would advise that a DCO requirement is put in place to undertake monitoring of birds during the operational phase of the development, in order to better our understanding of this technology and its potential to result in disturbance impacts on SPA bird populations.

Habituation

We note that Paragraph 6.7.0 states that *'Furthermore, the South Tees Development Corporation (STDC) site has been subject to disturbance from industrial activities for a number of years, and the assemblage of birds is likely to have habituated to noise at these levels.'* As outlined above, Natural England does not accept habituation as a justification for ruling out disturbance impacts on birds on its own and that a demonstration of how the predicted sources of disturbance will compare with those currently tolerated by SPA populations.

NE 8: Loss of Sightlines: Blast Furnace Pool

Natural England agrees with the scope and justification provided that impacts on loss of sightlines to birds utilising Blast Furnace Pools can be ruled out. This is due to the scale of the project and proximity to Blast Furnace Pools that, when considering the topography and distance, will not result in loss of sight lines for SPA birds using the pools.

We have come to this view based on the information provided in the RiHRA. If the scale/ layout of the project is to change then Natural England would wish to be consulted and for it to be assessed as to whether any changes.

NE14 and NE 19 – In-combination assessment

Natural England agrees with the scope and the conclusion of the in-combination assessment and agrees that AEOL can be ruled out as a result of cumulative effects. We have come to this view based on the information submitted in support of the project, in particular the phasing plan, bird assessment and noise modelling presented in the RiHRA, Annex J and Annex K. Should any details of the project change then this has the likelihood to alter the conclusion of this assessment, therefore we advise that any changes require consultation with Natural England and any required re-assessment of impacts. This is of particular relevance to the cumulative impacts on SPA birds, due to the potential for temporal overlap between projects at Teesside.

NE31

Natural England's comments on *'H2 Teesside report to Inform Assessment of Air Quality Impacts on Teesmouth and Cleveland Coast SSSI DRAFT'*

Natural England notes that the Applicant provided additional information on the air quality impacts on the SSSI in their document *'H2 Teesside report to Inform Assessment of Air Quality Impacts on Teesmouth and Cleveland Coast SSSI DRAFT'*.

Overall comments

Natural England provided comments on this to the Applicant on 14/02/25. Whilst we accept no AEOL on the Teesmouth and Cleaveland Coast SPA, we do not agree that the assessment excludes harm from air pollution impacts on the Teesmouth and Cleveland Coast SSSI due to the impact on the vegetated designated features cumulatively with other plans and project. The project alone would add 1.1% of the critical load for n-dep (0.11kgN/ha/yr) and 10.1% (1kgN/ha/yr) in-combination. At present no mitigation has been secured for this impact, and the project has not provided evidence that harm on the SSSI can be ruled out.

It is our opinion that the project requires mitigation for its cumulative effect with regards to N-deposition on Teesmouth and Cleaveland Coast SSSI. We previously provided advice on

potential mitigation options by email to the Applicant on 18/12/24. We note that in the *H2 Teesside report to Inform Assessment of Air Quality Impacts on Teesmouth and Cleveland Coast SSSI DRAFT* the Applicant suggests in Paragraph 3.1.9 that strategic action could be taken to address these issues, however such an approach is not yet established and therefore cannot at present be used to deliver or secure mitigation for this project.

We would like to make the following comments on the content of the document:

Appropriate critical levels/ loads to use:

Paragraph 1.2.6 – Natural England accepts an ammonia critical level of 3ug/m³ for this project.

Paragraph 1.2.5 – Natural England accepts the use of the critical load of 10 kgN/yr for N-dep in this case due to the timescales in which we provided our advice. We wish to highlight that Natural England's advice on the use of this threshold has since changed, and that for any other future plans or projects evidence on dune pH and P status will be required to inform which CL is appropriate to use for the sand dune habitats associated with Teesmouth and Cleveland Coast SSSI.

Operational Impacts:

- **Para 2.2.3 states** "*Environment Agency and Natural England have agreed that depositional impacts that are below 1% of the relevant critical load/ level for a site can be regarded as likely to be insignificant*". Natural England's position is that 1% must be in-combination, not that the project's contribution alone (1.1%) is insignificant among the other projects' contributions. It is also highlighted that IAQM guidance is that the 1% should be rounded to the nearest whole number. Natural England does not accept this. We do not require anything >0.5% to be rounded up to 1%, and we do not accept anything >1% (1.1% for example) to be rounded down.
- **Annual NOx (Table 4.8)** - the project alone contribution is 0.3ug/m³ (1.1%), and in combination 3.5ug/m³ (11.7%). Although the addition of 3.5ug/m³ would retard the downward trend in NOx concentrations by 3-4 years – overall the NOx critical load wouldn't be exceeded at the point of the SSSI most impacted by operational impacts – therefore NOx is unlikely to cause harm to the site both alone and in-combination and impacts can be ruled out.
- **Ammonia (Table 4.10)** –applying the 3ug/m³ critical load, the in-combination PC would add 3.3% (0.1ug/m³) to a non-declining ammonia background. However, overall, the critical load is not exceeded, so we would accept there is no harm to the site as a result of ammonia emissions.
- **Nitrogen deposition (Table 4.11)** – The project alone would add 1.1% of the critical load (0.11kgN/ha/yr) and 10.1% (1kgN/ha/yr) in-combination. In 2021 (most recent APIS background) Ndep was approximately 12.5kgN/ha/yr, lower than 13.5kgN/ha/yr in 2011, but only a 1kgN/ha/yr decline over 10 years. The decline has not been steady – there was a slight increase 2017-2019, in some cases bringing Ndep higher than the oldest 2003 data. Ndep in the area therefore appears to fluctuate and it could be questioned whether the area is on a defined downward trajectory. Additionally, it appears to be sensitive to interannual fluctuations.
- **Para 3.1.3** states that the background nitrogen levels at the site is now lower than it was in 2015 on designation. This is the case at Coatham – but not at North Gare which

the same or slightly higher in 2021 than 2015. It is also argued that the Ndep is much lower now than in 2003 (when it was 14.7-14.8kgN/ha/yr). However, Natural England does not accept that the site would have necessarily shown no response to Ndep in 2015 or earlier – and although there is no “restore objective” for a SSSI, recovering nature will not be possible if the habitat remains at the current levels - especially having regard to in-combination projects coming forward. Although ammonia is under the “vascular plant” critical load, ammonia will also contribute to Ndep and there is no evidence that ammonia at the site is declining - it fluctuates greatly, and this will also impact on Ndep levels.

- **Acid deposition (Table 4.12)** – the in-combination PC would add 1.5% of the critical load to the site but the critical load is not exceeded and this impact can be ruled out.
- **Para 3.1.5** states that the sand dune ecosystem is evolving, and slag deposition and movement defined the dunes since the 1940s when N deposition was much higher even than 2003. While we would accept this, as well as the fact that N deposition generally and locally has reduced – we do not accept that this would have had no impact on dune ecosystems, or that the ecosystems are not harmed by ongoing Ndep which will be retarding further improvement. Although H2 Teesside’s contribution to the in-combination impact is small, overall there is very limited capacity in the dune ecosystem for further pollution from whichever source.
- **Para 3.1.9 and 4.1.1** note the importance of strategic action at the site to address the nitrogen status and resilience of the SSSI – including establishing further information about the sites, their tolerance to further nitrogen and potential strategic mitigation. This could either be to remove nitrogen-inputs from elsewhere in the surrounding area or mitigate the impacts of additional nitrogen (for example, preventing nitrogen-tolerant grasses encroaching and outcompeting more sensitive dune species). Natural England supports this and agrees that such a strategic approach is positive to allow for potential Net Zero Carbon Development in the area, however such a solution is not established and therefore cannot be counted on to deliver mitigation for individual projects at present. If such a group was established in the future Natural England would be willing to participate in such a solution.

Appendix 2: Natural England's update regarding the Statement of Common Ground (SoCG)

Natural England Key Issues Reference	Key issue:	Matter Resolved?	Date Resolved	Natural England comments:
NE1	Direct loss of SPA habitat	Yes	20/11/2024	Based on the points in paragraph 6.1.8 of the Report to Inform HRA being secured in the CEMP, together with water REAC Table 7-2 reference to consultation with Natural England, we confirmed this matter resolved in our Deadline 4 response.
NE2	SPA bird populations	Yes	17/02/25	Natural England agrees with the scope of methodology outlined in Annex J.
NE3	Loss of functionally linked I& (SPA – birds)	Yes	17/02/25	Natural England regards this as agreed (please see comments above).
NE4	Noise disturbance (SPA) & Use of IECS toolkit	Yes	20/11/2024	Natural England confirmed this matter resolved in our Deadline 4 response, being satisfied that this matter is being addressed through dialogue with the applicant over representation of NE5.
NE5	Noise disturbance (SPA – birds)	Yes	17/02/25	Natural England accepts the evidence provided in Annex K of the updated Report to Inform HRA and considers the matter resolved.
NE6	Visual disturbance (SPA – birds – construction)	Yes	17/02/2025	Natural England accepts the evidence provided in Annex K of the updated Report to Inform HRA and considers the matter resolved.
NE7	Visual disturbance (SPA – birds – operation)	Yes	17/02/2025	Natural England accepts the evidence provided in Annex K of the updated Report to Inform HRA and considers the matter resolved.
NE8	Loss of sightlines (SPA – birds)	Yes	06/02/2025	Natural England confirmed our acceptance of the conclusions in the REP5-051 Appendix 2 report in our RIES response, and consider this matter resolved.
NE9	Air quality & dust (SPA)	Yes	17/02/2025	Matter agreed based on provisions outlined in table 8-1 of the framework CEMP.
NE10	AQ quality & traffic (SPA)	Yes	17/02/25	Natural England will provide an update on this by 19/02/25 but regards this issue as resolved.
NE11	Air quality & pollutants (SPA – construction)	Yes	03/10/2024	Natural England accepted the applicant's approach regarding construction emissions, and confirmed this matter resolved in our Written Representations response. Natural England recommended that the applicant outline specific controls on NRMM emissions near the SPA/SSSI boundary within the CEMP, to improve transparency and confidence in predicted outcomes.
NE12	Air quality & pollutants (SPA – operation)	Yes	06/02/2025	Natural England confirmed our acceptance of the evidence provided by the applicant regarding the Closed Loop System in our RIES response at Deadline 7, and consider this matter resolved.
NE13	Rochdale Envelope	Yes	20/11/2024	Natural England confirmed this matter resolved in our Deadline 4 response.
NE14	In-combination assessment (birds)	Yes	17/02/2025	Natural England considers this matter resolved based on the current construction schedule presented in the applicant's submission. Natural England advise that we require to be reconsulted on the in-combination impacts from this development should this schedule change.
NE15	HRA	Yes	17/02/25	Natural England will provide comments on this by 19/02/25 but regards this matter as resolved.
NE16	Mitigation	Yes	20/11/2024	Natural England agrees that this is agreed subject to the securing of mitigation in the CEMP.
NE17	Air quality & nitrogen (SPA)	Yes	17/02/25	Natural England will provide comments on this by 19/02/25 but regards this issue as resolved.
NE18	Ecotoxicology	Yes	10/02/2025	Natural England commented at Deadline 7 that should the disposal of liquid/sludge amine waste take place at a licensed facility within the Tees Nutrient Neutrality catchment, any additional nutrient loading should be calculated and appropriate mitigation provided. The applicant subsequently provided further information in an email dated 10/02/2025, to advise they intend to propose the following changes to the Draft DCO

				<p><i>"We propose the following update to meet your requirements and to ensure that liquid amine waste disposal takes place outside the Tees Nutrient Neutrality catchment: (4) The details submitted and approved pursuant to sub-paragraphs (1) and (3) of this requirement must — (a) be in substantial accordance with the mitigation measures set out in Chapter 9 of the Environmental Statement, Flood Risk Assessment, Indicative Surface Water Drainage Plan, Nutrient Neutrality Assessment, and Water Framework Directive Assessment; (b) in the case of the process effluent drainage system, provide that Case 1B, as described in the Nutrient Neutrality Assessment, is not to be used; and (c) provide that amines are not disposed of via a licensed facility into the Teesmouth SPA and Ramsar site."</i></p> <p>Based on these changes being secured in the DCO, Natural England considers this issue resolved.</p>
NE19	In-combination assessment (birds, water, air quality)	Yes	17/02/25	Natural England is satisfied with the scope and conclusions in the in-combination report.
NE20	Water quality & Nutrient Neutrality	Yes	20/11/2024	Natural England confirmed in our Deadline 4 response that the proposed Case 2B in the water Quality Modelling Report demonstrated that the proposed development would not cause an increase in Dissolved Inorganic Nitrogen such that would adversely impact the condition of the Tees transitional waterbody, or the Tees Bay. We therefore consider this matter resolved.
NE21	Water quality & EIA	Yes	03/10/2024	Through discussion with the applicant Natural England confirmed in our Written Representations response that no significant impacts are anticipated for the international designated sites listed in reference to this Key Issue, and we therefore consider the matter resolved.
NE22	Water quality & surface water	Yes	03/10/2024	Through discussion with the applicant Natural England confirmed in our Written Representations response that no significant impacts are anticipated for the international designated sites listed in reference to this Key Issue, and we therefore consider the matter resolved subject to consideration in the final CEMP.
NE23	Water quality & effluent	Yes	20/11/2024	Natural England accepted the applicant's modelling at Deadline 4 and consider this matter resolved.
NE24	Air quality & acid deposition (SPA & SAC)	Yes	20/11/2024	Natural England accepted that the applicants modelled deposition did not represent a significant effect at Deadline 4, and therefore consider this matter resolved.
NE25	Air quality & nitrogen (SAC & Ramsar)	Yes	03/10/2024	Natural England confirmed in our Written Representations that our position had changed on this matter following our Relevant Representations, and therefore we consider this matter resolved.
NE26	Noise – Seals	Yes	06/02/2025	Natural England confirmed our acceptance of the conclusions as outlined in the HRA Annex I Marine Mammals Technical Note at Deadline 7 and consider this matter resolved.
NE27	Salmon/Sea Lamprey	Yes	03/10/2024	Natural England agreed in our Written Representations that adverse effects on the integrity of the River Tweed SAC and Tweed Estuary SAC could be ruled out subject to suitable mitigation being secured as part of the DCO. We therefore consider this matter resolved.
NE28	Air quality – ammonia and acid (SSSI)	Yes	17/02/25	We are satisfied with the information provided within (Table 4.10) of <i>H2 Teesside report to Inform Assessment of Air Quality Impacts on Teesmouth and Cleveland Coast SSSI DRAFT</i> . Applying the 3ug/m3 critical load, the in-combination PC would add 3.3% (0.1ug/m3) to a non-declining ammonia background. However, overall, the critical load is not exceeded, so we would accept there is no harm to the site as a result of ammonia emissions.
NE29	Scope of pollutants (SSSI)	No	N/A	We will provide an update on this at Deadline 8
NE31	SSSI air quality impacts	No	N/A	We do not regard this issue as resolved. Please see our comments above on SSSI air quality impacts.
NE32	Bats	Yes	20/11/2025	At Deadline 4 Natural England accepted further confirmation of the low roosting suitability of the boundary trees and requested that the applicant ensure that any precautionary felling of trees is conducted at an appropriate time of year avoiding hibernation and maternity periods. We therefore consider this matter resolved.

NE33	Water Vole	Yes	20/11/2025	Natural England confirmed our acceptance of the Applicant's approach at Deadline 4, and therefore consider this matter resolved.
NE34	Biodiversity Net Gain	N/A	N/A	Biodiversity Net Gain (BNG) is not yet mandatory for NSIP developments, therefore we do not consider this a Key Issue to resolve for this project. We do however strongly recommend that BNG provision is secure through this development, reflecting the important role NSIPs must play in delivering the government's environmental targets.
NE35	Soils and Best and Most Versatile Agricultural Land	Yes	18/12/2025	Natural England confirmed in our Deadline 5 response to the ExA's questions that we had no further comments to make regarding this matter, and for the purposes of the SoCG can consider this issue resolved.
NE36	King Charles III England Coast Path	Yes	20/11/2025	Natural England noted the applicant's responses provided at Deadline 2 and Deadline 3 and accepts that this matter is resolved.