



Environment, Climate Emergency and Transport Committee

Date:	Monday, 15 April 2024
Time:	6.00 p.m.
Venue:	Assembly Hall - Birkenhead Town Hall

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AGENDA

- 1. WELCOME AND INTRODUCTION**
- 2. APOLOGIES**
- 3. MEMBERS' CODE OF CONDUCT - DECLARATIONS OF INTEREST**

Members are asked to consider whether they have any disclosable pecuniary interests and/or any other relevant interest in connection with any item(s) on this agenda and, if so, to declare them and state the nature of the interest.

- 4. PUBLIC AND MEMBER QUESTIONS**

4.1 Public Questions

Notice of question to be given in writing or by email by 12 noon, Wednesday 10 April to the Council's Monitoring Officer via this link: [Public Question Form](#) and to be dealt with in accordance with Standing Order 10.

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Please telephone the Committee Services Officer if you have not received an acknowledgement of your question by the deadline for submission.

4.2 Statements and petitions

Notice of representations to be given in writing or by email by 12 noon, Wednesday 10 April to the Council's Monitoring Officer (committeeservices@wirral.gov.uk) and to be dealt with in accordance with Standing Order 11.1.

Petitions may be presented to the Committee if provided to Democratic and Member Services no later than 10 working days before the meeting, at the discretion of the Chair. The person presenting the petition will be allowed to address the meeting briefly (not exceeding three minute) to outline the aims of the petition. The Chair will refer the matter to another appropriate body of the Council within whose terms of reference it falls without discussion, unless a relevant item appears elsewhere on the Agenda. If a petition contains more than 5,000 signatures, it will be debated at a subsequent meeting of Council for up to 15 minutes, at the discretion of the Mayor.

Please telephone the Committee Services Officer if you have not received an acknowledgement of your statement/petition by the deadline for submission.

4.3 Questions by Members

Questions by Members to be dealt with in accordance with Standing Orders 12.3 to 12.8.

5. HOYLAKE BEACH MANAGEMENT PLAN (Pages 1 - 72)

The appendices of the report may not be suitable to view for people with disabilities, users of assistive technology or mobile phone devices. Please contact hoylakebeach@wirral.gov.uk if you would like this document in an accessible format.

Terms of Reference

The terms of reference for this committee can be found at the end of this agenda.

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ENVIRONMENT, CLIMATE EMERGENCY AND TRANSPORT COMMITTEE

Date 15 April 2024

Report Title:	HOYLAKE BEACH MANAGEMENT OPTION
Report of:	DIRECTOR OF NEIGHBOURHOOD SERVICES

REPORT SUMMARY

This report provides the Committee with the results of the recent consultation exercise relating to the management of Hoylake Beach. In light of the consultation and progress made thus far with Natural England, Members are asked to determine a preferred position upon which officers can proceed development of a beach management plan for Hoylake Beach. Members now have sufficient information to resolve a preference. This preference will be used as the basis for Wirral Council's position, although no beach management will be implemented without Natural England's assent.

The future management of Hoylake Beach supports the delivery of the Council Plan 2023-27, specifically the Protecting Our Environment and Safe, Resilient and Engaged Communities themes.

This report affects the Hoylake & Meols ward.

This is not a key decision.

RECOMMENDATIONS

The Environment, Climate Emergency and Transport Committee is recommended to:

1. Consider the content of the Hoylake Beach Management Plan Consultation Report enclosed as Appendix A to this report; and
2. Authorise the Director of Neighbourhood Services to work with Natural England to develop a beach management plan that approximates as closely as possible the consultees' overall preferred option (Option 2 - Amenity Beach).
3. Authorise the Director of Neighbourhood Services to
 - a. progress the items referred to in paragraph 4.4 of this report which are all required to be in place before the beach management plan can be implemented; and
 - b. finalise and implement the beach management plan subject to assent being in place from Natural England.

SUPPORTING INFORMATION

1.0 REASONS FOR RECOMMENDATIONS

1.1 At the 30 November 2022 meeting, this Committee rejected the consultation options developed on behalf of the Council by its consultants Royal Haskoning DHV, and resolved that the Director of Neighbourhoods was to work with Natural England and Merseyside Environmental Advisory Service (MEAS) to refine, as appropriate, the following two options:

1. An option to work with natural processes along the entire beach but with a focus on greatly improved access for all and clearance of slipways.

2. An option, similar to the Royal Haskoning Report of 03 November 2022, reference PC2553-RHD-ZZ-XX-RP-Z-0001 option 3, but with reduced vegetation clearance. This could involve 'do nothing' from Red Rocks to Trinity Road and 'do everything' from Trinity Road to the RNLI station.

1.2 This Committee also resolved that any options put forward for consultation must meet Natural England's full approval – although Natural England's Discretionary Advice Service will help to guide development of a beach management plan, Natural England will not give 'full approval' to options. They will, or will not, give assent to a beach management plan. Natural England's purpose is to help conserve, enhance and manage the natural environment for the benefit of present and future generations. Natural England subsequently provided advice through their Discretionary Advice Service based on Habitat Regulations Assessments for both beach management options developed. This advice was received on 19 January 2024 and is based on the Habitat Regulation Assessments developed at plan or strategy level. The advice received in January 2024 indicated that refinement of those options would be required for assent. Since that advice was received officers from the Council have been working closely with Natural England officials to refine the Habitat Regulation Assessments to meet their requirements and clarifications. Following identification of the preferred beach management option the Habitat Regulation Assessments will be further developed for the implementation phase. Assent from Natural England will also be required for works within North Wirral Foreshore Site of Special Scientific Interest prior to implementation of the approved beach management option.

1.3 Officers have worked with Natural England and MEAS in developing the options as well as with the Royal National Lifeboat Institute (RNLI) as a key stakeholder and user of Hoylake Beach. The two options are described further in the Background Information to this report.

1.4 Public consultation on the two options took place between 19 February 2024 and 25 March 2024. A report on the outcome of the consultation is included as Appendix A. The most popular option, following consultation, approximates the requirements of the committee resolution of 30 November 2022 for Option 2, amended to include the defined RNLI requirements and a natural taper from Trinity Road to a return at Government Road some 140m further west. Either option would need refinement to secure assent from Natural England as the basis for a beach management plan. The Director of Neighbourhood Services now needs authority from the committee to use one of these options as the basis for developing a beach management plan, with Natural England assent. The question put plainly is, should officers be seeking to

secure as much or as little raking on the beach as Natural England will permit? The preference of the majority of consultees is clear from the recent exercise.

2.0 OTHER OPTIONS CONSIDERED

2.1 At the 20 November 2022 meeting the Environment, Climate Emergency and Transport Committee rejected the consultation options developed on behalf of the council by their consultants Royal Haskoning DHV.

2.2 Two further options have been developed and subject to public consultation. Option 2 Amenity Beach is the most popular option as determined by that consultation.

3.0 BACKGROUND INFORMATION

3.1 The objectives of the Beach Management Plan, which were set out in the report to this Committee on 30 November 2022, are to:

- Not compromise or adversely impact on the integrity of designated sites;
- Promote biodiversity and contribution to mitigating climate change;
- Minimise disturbance to wildlife;
- Maintain and enhance the amenity benefit, wellbeing and health of the local community and visitors;
- Ensure the safety of users and access across the beach;
- Contribute to the reduction in the risk of flooding and/or erosion to local property and infrastructure; and
- Provide recommendations on further studies and monitoring to inform future management.

3.2 Members will recall that prior to the development of any beach management options for Hoylake Beach, this Committee approved the production of a Geomorphology and Ecology Study. The Study helped to define, in conjunction with the outputs from the initial public consultation in July 2022, the objectives for Hoylake Beach Management Plan. The Study has provided an evidence base of changes regarding beach levels and vegetation growth. The Study also considered the impact of two extreme management scenarios – ‘Do Nothing’ and ‘Do Everything’ (in terms of beach management), to predict future change and risk.

3.3 The two options which Committee agreed on 30 November 2022 should be further developed can be summarised as:

- Option 1 ‘Access for All’; and
- Option 2 ‘Amenity Beach’

Both options meet the majority of the objectives for Hoylake Beach Management Plan as set out above, however Natural England have advised that both options require modifications before they can conclude that they will not adversely impact on the integrity of designated sites.

3.4 Royal Haskoning DHV was again commissioned by the Council to develop the two beach management options and the supporting Habitat Regulation Assessments. A botanical survey was commissioned, following review by Natural England, with a wider specification than the Ecological Survey of 2021. The botanical survey:

- mapped the seaward extent of vegetation on the foreshore;

- re-visited the quadrats visited by the Ecological Survey in July 2021 for direct comparison of establishing vegetation;
- produced a species list, with relative species abundances, for the whole site;
- surveyed vegetation along the sea wall; and
- recorded the presence of any non-native species.

The survey thereby provided a contemporary evidence base for the development of supporting Habitat Regulation Assessments for the beach management options. The botanical survey was undertaken in July and August 2023.

- 3.5 A further species-specific survey to confirm the reported presence of the protected species Shore Dock (*Rumex Rupestris*) was undertaken in October 2023. Shore Dock was not located during the survey within the Hoylake Beach management area.
- 3.6 Some elements of beach management activities are common to both options, and these are set out below:
- Maintenance of Highway Drainage;
 - Improvements to water quality discharges;
 - Maintenance of Hoylake Boating Lake;
 - Management of Wind-blown Sand; and
 - Hoylake Beach Code of Conduct
- 3.7 In addition, the requirements of the RNLI are set out in both options with areas of vegetation removal identified to allow for continued safe operation of life saving operations.
- Maintenance of Highway Drainage
- 3.8 The outfalls serving the highway drainage network for the adjacent North Parade were previously maintained so that they were not blocked with sand and had a clear outlet onto the foreshore. Both beach management options include for localised sand clearance at the sea wall to allow for free discharge onto the foreshore and improve highway drainage at North Parade
- Improvement to Water Quality Discharges
- 3.9 The current highway drainage arrangement allows for road pollutants to be discharged to the foreshore when highway drains are in use. Both beach management options recommend installation and maintenance of petrol interceptors to prevent pollutants reaching the foreshore. A Feasibility Study is planned to consider longer term improvements that may be brought about by intercepting and diverting flows for treatment and discharge elsewhere.
- Maintenance of Hoylake Boating Lake
- 3.10 Wind-blown sand frequently infills Hoylake Boating Lake. Current arrangements to remove and dispose of the sand are time consuming and costly. Drainage of the lake water is problematic as it cannot easily be drained to sewer and dredged sand is disposed off site incurring transportation costs. Both beach management options have identified improved arrangements for drainage of the lake (subject to Environmental Permitting requirements from the Environment Agency) and disposal of the sand on the foreshore to the east of Hoyle Road Slipway (subject to Marine Licence from the Marine Management Organisation).

Management of Wind-Blown Sand

- 3.11 The requirement for sand fencing along the full length of North Parade has been considered as part of the beach management options development. Both options contain a recommendation to remove the green plastic netting as its weathering has caused it to become brittle resulting in fragments breaking off and littering the beach. Both beach management options recommend further monitoring to evaluate the impact that vegetation growth has before installing a suitable sand fencing system.

Hoylake Beach Code of Conduct

- 3.12 Both beach management options include the introduction of a Beach Code of Conduct. Based on the principles of “Respect, Protect, Enjoy” it can be promoted shared and displayed to all visitors of Hoylake Beach so that everyone conducts themselves in a safe, sensible and environmentally friendly way while enjoying the beach. The beach code will provide guidance on the themes of:
- Leave No Trace Behind;
 - Protecting Wildlife; and
 - Guidance for dog owners.

Option 1 Access for All

- 3.13 The Access for All option provides the “do minimum” option with regard to vegetation removal. The Access for All Option does not include vegetation removal between Red Rocks and Kings Gap (likewise, Option 2 Amenity Beach). Option 1 Access for All does include for removal of:
- sand and vegetation from slipways to improve access onto the foreshore;
 - a 10m strip of vegetation from Kings Gap perpendicular to the coastline through the emerging saltmarsh. This strip is to allow for launch and recovery of RNLI equipment during lifesaving operations;
 - a strip of vegetation no wider than 10m, parallel to the sea wall from Kings gap to the RNLI west slipway. This strip is to allow for launch and recovery of RNLI equipment during lifesaving operations; and
 - vegetation for 200m to the west (approximately Clydesdale Road) and 150m to the east of the Hoylake Lifeboat Station. This is to allow for launch and recovery of RNLI equipment during lifesaving operations.
- 3.14 A plan showing the specific requirements for Option 1 Access for All is included as Appendix B to this report. Details of the RNLI operational requirements and how they relate to the vegetation removal identified within Option 1 Access for All are included as Appendix D to this report.

Option 2 Amenity Beach

- 3.15 The Amenity Beach option provides a “do minimum” approach regarding vegetation removal between Red Rocks and Kings Gap. A plan showing the specific requirements for Option 2 Amenity Beach is included as Appendix C to this report. Option 2 Amenity Beach also includes for removal of:
- sand and vegetation from slipways to improve access onto the foreshore;
 - a 10m strip of vegetation from Kings Gap perpendicular to the coastline through the emerging saltmarsh. This strip is to allow for launch and recovery of RNLI equipment during lifesaving operations;
 - a strip of vegetation no wider than 10m, parallel to the sea wall from Kings Gap to the RNLI west slipway. This strip is to allow for launch and recovery of RNLI equipment during lifesaving operations; and
 - vegetation for 150m to the east of the Hoylake Lifeboat Station and 300m to the west at Trinity Road, tapered on its landward return at Government Road some

140m further west. This also includes the area for launch and recovery of RNLI equipment during lifesaving operations.

- 3.16 The Committee resolution of 30 November 2022 required officers to work closely with MEAS and Natural England to refine the two options set out above. Both MEAS and Natural England have been involved in the development of the options through:
- Review and comment on survey specifications;
 - Review and provision of discretionary advice on survey reports; and
 - Review and provision of discretionary advice on supporting HRAs to the two options prior to commencement of consultation.

4.0 FINANCIAL IMPLICATIONS

- 4.1 The cost of developing the initial Hoylake Beach Management Options Report was £20,887 and this has been met from Climate Emergency Budget.

- 4.2 The cost of developing the two further options as required by the committee resolution of 30 November 2022 is £30,625. These costs have been met from existing budgets within Neighbourhood Services. This is broken down as follows:

Additional Royal Haskoning DHV Commission	£12,525
Natural Capital Change Assessment	£4,980
Botanical Survey	£5,159
Shore Dock Survey	£1,155
Natural England Discretionary Advice	£4,015
MEAS Discretionary Advice	£2,791

- 4.3 There is no specific budget code for Hoylake Beach. Staff costs incurred since August 2019 have been absorbed into various budgets across the council. An estimate of the costs associated with staff time for Hoylake Beach Management has recently been developed. For the period to end of January 2024 staff time is as follows:

Staff Costs	£162,000
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- 4.4 Prior to implementation of either option, the following activities are anticipated:
- Development and refinement of HRA to implementation stage;
 - Marine Management Organisation Discretionary Advice;
 - Water Framework Directive Assessment;
 - Marine Licence Application; and
 - Protected Species Survey

The estimated costs of the pre-implementation activities, which apply to either option, are approximately £50,000 and can be met from existing budgets within Neighbourhood Services.

- 4.5 The preparatory activities identified in paragraph 4.4 above, in addition to any further refinements, as required by Natural England are unlikely to be resolved before the start of September. Any assent or marine licence received is likely to be conditional upon works being undertaken between the months April to September to avoid disturbance to overwintering bird populations.
- 4.6 An estimate has been developed for the one-off operation to remove vegetation as required by either option. The method for removal is similar to that for removal of

vegetation from the amenity beach at West Kirby (which already has assent from Natural England). The method allows for removal of green waste but retention of beach material on site. The estimated cost for vegetated removal is £230,000 and this estimate applies to both options.

- 4.7 A growth bid has been developed for £300,000 which addresses the costs for vegetation removal at Hoylake and West Kirby beaches and the other aspects of the beach management options and all the associated pre-implementation costs.
- 4.8 Ongoing maintenance to rake the managed areas would be met from the Parks & Countryside Service grounds maintenance budget. Annual costs of £20,000 are estimated.
- 4.9 Ongoing monitoring of both geomorphology and ecology will also be required. Annual costs are in the region of £10,000 are estimated. There may be grants available which meet the monitoring costs in part.

5.0 LEGAL IMPLICATIONS

- 5.1 Hoylake Beach forms part of North Wirral Foreshore Site of Special Scientific Interest, Dee Estuary Special Area of Conservation, Mersey Narrows and North Wirral Foreshore Special Protection Area / Ramsar site. Natural England has provided advice to the Council, through its Discretionary Advice Service under Section 28H of the Wildlife and Countryside Act 1981 (as amended) and under the Conservation of Habitats and Species Regulations 2017 (as amended). Seeking and gaining its advice that either beach management option would receive assent at implementation stage was a requirement of the Committee's resolution of 30 November 2022.
- 5.2 The Committee resolution of 30 November 2022 required full support from Natural England prior to public consultation on the two options. Its Discretionary Advice on both beach management option is included as Appendix E.
- 5.3 In order to deliver either of the developed options, an implementation stage Habitat Regulations Assessment will need to be developed and submitted to Natural England for assent. Given that they have advised that they would not be able to support either option without refinement, it is unlikely that an implementation stage Habitats Regulation Assessment for either option, as consulted upon, would receive assent from Natural England. However, Council officers have continued to work with Natural England officials over the past several months, to identify required refinements to the beach management options that would enable such support to be given.
- 5.4 Both options require removal of vegetation from below mean High Water Spring Tides. The removal operation will involve the use of a vehicle. This is a licensable activity under the Marine and Coastal Access Act 2009 and will require a Marine Licence from the Marine Management Organisation (MMO). The area of vegetation removal is also within North Wirral Foreshore SSSI, so the Marine Licence application requires a supporting Water Framework Directive Assessment. The MMO will consult with statutory consultees, including Natural England, on the licence application. Additionally, the MMO is defined as the competent authority under Regulation 63 of the Habitat Regulations.

- 5.5 The costs of pre-implementation assessments and licences have been included within the estimates in paragraph 4.4 of this report.
- 5.6 There has been a recent application and consultation on a Town and Village Green at Hoylake Beach. The position of the application is being determined in parallel with the development of a beach management plan. Paragraph 4.5 above sets out the likely timeframe for the implementation of a beach management plan however any determination of the Town and Village Green until after April 2025 could impact on the implementation of the beach management plan.

6.0 RESOURCE IMPLICATIONS: STAFFING, ICT AND ASSETS

- 6.1 Existing resources have been used to develop the Have Your Say questionnaire, undertake analysis, and produce the Consultation Report. Similarly existing resources have been used to promote the consultation via the means identified in Section 8.0 of this report.

7.0 RELEVANT RISKS

Natural England

- 7.1 In their Discretionary Advice Service (DAS) submission of 19 January 2024 Natural England indicated that they do not support the beach management actions as set out in either option. They have communicated that refinement is needed for them to agree with a conclusion of 'No Adverse Impact' on site integrity at a Habitat Regulations Assessment level.
- 7.2 During the consultation period further modifications were made to both options, based on the DAS of 19 January 2024 as part of the ongoing work between the Council and Natural England. The revised Habitats Regulations Assessment options were submitted to Natural England for advice on 27 February 2024 and further DAS was received on 01 March 2024 (Appendix F). Natural England have concluded, that subject to certain conditions being met, both options will avoid adverse effects upon the interest features for which the sites are notified. This means that both options now meet the plan objectives as set out in paragraph 3.2 and would indicate Natural England support at HRA level. These sites are:
- Mersey Narrows and North Wirral Foreshore Ramsar Site;
 - Dee Estuary Special Area of Conservation (SAC); and
 - Mersey Narrows and North Wirral Foreshore Special Protection Area (SPA).
- 7.3 The conclusion reached by Natural England in their DAS of 1 March 2024 does not provide assent for either option and the DAS is clear that the options have not yet been assessed at SSSI level. North Wirral Foreshore SSSI has a smaller area than the SAC, SPA and Ramsar sites assessed at HRA level and therefore the vegetation losses, in either option, would be a greater percentage loss when compared against the whole site area. It is unlikely that Natural England would fully assent all operations if an application was made based upon a project level HRA as this must also consider the impact on the SSSI.
- 7.4 There are precedents where Natural England have not given assent in full but where the applicant has still undertaken the work as they were of the opinion it needed to be undertaken because of overriding reasons relating to public interest. For example, Network Rail have undertaken work to address safety issues at Frodsham Railway and Road Cuttings SSSI despite refusal of assent by, Natural England which they subsequently have not challenged.

- 7.5 The lifesaving operations of the RNLI, as set out in the Access for All option, could be considered as overriding reasons relating to public interest for undertaking work without assent from Natural England. However, the Committee would need to consider whether provision of an Amenity Beach met the same parameters for overriding reasons relating to public interest.
- 7.6 There is a risk that if works are undertaken without assent that do not meet requirements for overriding reasons relating to public interest, then legal action could be taken by Natural England. The recommendation before members in this report seeks a preferred option for officers to pursue, not permission to implement a plan without NE assent.

Marine Management Organisation

- 7.7 All options developed require removal of vegetation from below Mean High Water Spring Tides and the method of undertaking this would require a licence from the Marine Management Organisation (MMO) under the Marine and Coastal Access Act 2009.
- 7.8 For licence applications the MMO are defined as the competent authority. They need to determine whether the proposed operation would have an adverse impact on site integrity. This is undertaken via a Habitat Regulations Assessment submitted as part of the licence application. A HRA considers the impact on Ramsar, SPA and SAC designations. The MMO undertake statutory consultation to determine this. Natural England is a statutory consultee. There is a risk that any prior refusal in total or in part of assent, with regard to the SSSI, may cause Natural England to object to the licence application consultation. However, their officers have intimated that Natural England would not submit an objection.
- 7.9 If the MMO conclude that the implementation of the preferred option may cause an adverse impact on site integrity they may refuse the application for a marine licence. To overcome this refusal further iterations of the Habitat Regulations would be required:

Stage 3 – Assessment of Alternative Solutions

- 7.10 Stage 3 involves identifying and examining alternative ways of achieving the objectives of the project to establish whether there are solutions that would avoid or have a lesser effect on the site.
Two options have been developed following initial public consultation. It is unlikely that any further options could be considered.

Stage 4 – Imperative Reasons of Overriding Public Interest (IROPI)

- 7.11 Where no alternative solutions exist, and where an adverse effect on site integrity remains, the next stage of the process is to assess whether the development is necessary for 'Imperative reasons of overriding public interest'. If Imperative reasons of overriding public interest can be demonstrated, compensatory measures need to be identified to maintain the overall coherence of the designated site network.
- 7.10 The risk is that if the preferred beach management option meets the imperative reasons of overriding public interest test because of the inclusion of the RNLI operational requirements they can proceed, however this would be subject to the provision of compensatory habitat.

- 7.11 Implementing any beach management option without a marine licence would leave the council at risk of prosecution by the MMO under the Marine and Coastal Access Act 2009. The risks associated with the MMO can be mitigated by requesting, paid for, advice via their DAS. An estimate of the costs associated with this is included in paragraph 4.4.
- 7.12 Any delay in implementation of the preferred beach management option would increase the likelihood of the growth of protected species which would lead to further difficulty in implementing the plan. This risk could be mitigated against through the provision of species-specific surveys prior to implementation.

8.0 ENGAGEMENT/CONSULTATION

- 8.1 Appendix A of this report details the engagement processes and consultation undertaken on the two management options developed in accordance with the Committee’s resolution of 30 November 2022.
- 8.2 Consultation was undertaken primarily through the Have Your Say website with online survey and additional document available to the public. An information display was placed in Hoylake Community Hall on two days, for the public to visit to see the options in person. For those unable to access the online consultation site, paper copies of the consultation were provided.
- 8.3 The consultation was promoted through a mix of online and print media in the local area. Outdoor banners were also placed at Hoylake beach. Further details are listed in Appendix A of this report.
- 8.4 Consultation was undertaken from 19 February to 25 March 2024. The headline outputs from the consultation are as follows:

Wirral Responses	1045
Responses outside Wirral	73
Location not provided	7
Total Responses Received	1125

Option 1 Access for All	26.6%
Option 2 Amenity Beach	67.2%
Don't Know	6.2%

9.0 EQUALITY IMPLICATIONS

- 9.1 The potential impact of the proposals contained within this report have been reviewed and the Equalities Impact Assessment – Hoylake Beach Management Option is attached – <https://www.wirral.gov.uk/communities-and-neighbourhoods/equality-impact-assessments>

10.0 ENVIRONMENT AND CLIMATE IMPLICATIONS

- 10.1 Climate Change is a key factor in selecting a future sustainable beach management option at Hoylake. The Ecology and Geomorphology Study identifies a trend of accretion in foreshore volumes across the Hoylake frontage, with sediment fed into the area by easterly littoral drift and onshore movement from Liverpool Bay. The Ecology and Geomorphology Study also predicts that accretion, or increases beach level, will outpace increases in sea level, based on 50 percentile medium emissions scenario.
- 10.2 Both management options align with this prediction and would result in positive benefits regarding the management of flood and coastal erosion risks and also carbon sequestration.
- 10.3 The Ecology and Geomorphology Study included a Natural Capital Change Assessment for the whole beach management area from Red Rocks to Hoylake RNLI Station. Under a 'Do Nothing' scenario the assessment estimated carbon sequestration based on the change in area of sand / mud flats, saltmarsh and sand dunes.

	Carbon Sequestration (tonnes C / year)			
	2022	2032	2042	2072
Total	413.1	440.5	478.2	658.0

- 10.4 The Ecology and Geomorphology Study concluded that after 50 years the increase in vegetation would allow for an increase of 245 tonnes of carbon per year to be sequestered.
- 10.5 Both the Access for All and the Amenity Beach option reduce the estimate of vegetation increase under a 'Do Nothing' scenario. The whole beach management area assessed in the Natural Capital Change Assessment was defined at 195 hectares with 102 hectares of vegetation after 50 years. The area of vegetation removal for each option is as follows:
- Option 1 Access for All 1.92 ha (1.87% of the vegetated area at 50 years)
Option 2 Amenity Beach 3.05 ha (2.98% of the vegetated area at 50 years)
- 10.6 The estimate of carbon sequestered would therefore be reduced for both options but with a lesser reduction for the Access for All option.

11.0 COMMUNITY WEALTH IMPLICATIONS

- 11.1 Both beach management options provide areas of naturally vegetated beach and vegetation free beach. Opportunities will exist for the community to enjoy recreational activities related to both habitats.

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APPENDICES

Appendix A	Hoylake Beach Management Plan Consultation Report DRAFT
Appendix B	Plan : Option 1 : Access For All Management Option
Appendix C	Plan : Option 2 : Amenity Beach Management Option
Appendix D	Royal National Lifeboat Institute Letter & Appendices
Appendix E	Natural England advice Beach Management Options HRAs 19 January 2024
Appendix F	Natural England advice Beach Management Options HRAs 01 March 2024

BACKGROUND PAPERS

Habitats regulations assessments: protecting a European site.

<https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

Ecology and Geomorphology Study, 18 February 2022, Royal HaskoningDHV

Hoylake Beach Management Plan Identification of short-listed options, 03 November 2022, Royal HaskoningDHV

National Vegetation Classification (NVC) survey Hoylake Beach, Wirral for Haskoning DHV UK Ltd, Thomson Environmental Consultants August 2023

Natural England advice to Wirral Council regarding beach management – Natural England March 2020

Royal Haskoning DHV Hoylake BMP HRA_Access for All Final

Royal Haskoning DHV Hoylake BMP HRA_Amenity Beach Final

Royal Haskoning DHV Hoylake BMP HRA_Access for All Final v2

Royal Haskoning DHV Hoylake BMP HRA_Amenity Beach Final v2

Merseyside Environmental Advisory Service - Hoylake Beach Management Habitats Regulations Assessment Advice DISC23-029 January 2024

TERMS OF REFERENCE

This report is being considered by the Environment, Climate Emergency and Transport Committee in accordance with Sections (a) and (e) of its Terms of Reference:

The Committee is charged by full Council to undertake responsibility for the Council's role and functions: -

- (a) in co-ordinating the response to cross-cutting sustainability issues such as reducing carbon emissions, air quality issues, climate change response, improving resource efficiency and developing sustainable energy.
- (e) in respect of parks, open spaces, countryside management, allotments, playgrounds and cemeteries, including arboricultural, gardening and warden services.

SUBJECT HISTORY (last 3 years)

Council Meeting	Date
Environment, Climate Emergency and Transport Committee	30 November 2022
Environment, Climate Emergency and Transport Committee	16 March 2021
Environment, Climate Emergency and Transport Committee	03 December 2020
Special Meeting - Environment Overview and Scrutiny Committee Call-in Hoylake Beach Management	21 August 2020
Executive Member Decision Hoylake Beach Management	13 March 2020

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Have your say

Hoylake Beach Management Plan – Phase 2 Consultation Report

Hoylake Beach

Consultation: 19 February – 25 March 2024

Report: 2 April 2024

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1.0 Executive Summary

Wirral Council is moving forward on developing a new beach management plan for Hoylake and has engaged with residents, elected members, and other stakeholders as part of this process.

Phase 1 consultation ran from 29 June to 10 August 2022. This consultation was held to consider public and stakeholder feedback to develop draft objectives for Hoylake Beach future management options.

Following Phase 1 all the feedback was collated and reviewed by the Environment, Climate Emergency and Transportation Committee and proposals for Phase 2 of the consultation were prepared.

For Phase 2 of the consultation two options have been developed and put forward for public consultation. The two options are:

Option 1: The Access for All option is based on the Environment, Climate Emergency and Transportation Committee's resolution to work with natural processes along the entire beach but with a focus on greatly improved access for all and clearance of slipways.

The Access for All option provides the "do minimum" option with regard to vegetation removal.

Option 2: The Amenity Beach option provides a more extensive approach with regard to vegetation removal. It is based on the Environment, Climate Emergency and Transportation Committee's resolution to "do nothing" from Red Rocks to Trinity Road and "do everything" from Trinity Road to the RNLI station.

The feedback from the Phase 2 consultation is provided in this report. This will be reported to a meeting of the Environment, Climate Emergency and Transport Committee in April 2024.



1.1 Key Findings

- The questionnaire was responded to by 1125 people. 1003 responses came through the online portal and 122 paper copies were completed.
- Most of the survey participants were Wirral residents (92.9%). 61.3% of participants were residents of Hoylake and Meols ward.
- For all responses the most supported option was Option 2 – Amenity Beach with 67.2% of respondents preferring this option. 26.6% of respondents preferred Option 1 – Access for All and 6.2% did not know which they preferred.
- The responses from just Wirral residents (1,045) provided the most support for Option 2 with 69.4% of Wirral residents supporting this option. 25.1% supported Option 1 and 5.6% did not know.
- Those residing outside of Wirral provided 73 responses, of these 47.9% supported Option 1, 35.6% Option 2 and 16.4% did not know.
- For respondents living in the Hoylake and Meols ward (690 responses) the most supported option was Option 2, 77.1%, whilst 17.2% supported Option 1 and 5.7% did not know.
- The top reason given for supporting Option 1 was that it retains the most vegetation (69.2%).
- The top reason for supporting Option 2 was that the beach will be available for recreational use, in particular for the use of families and children (32.3%).
- Most people who chose ‘I don’t Know’ did so because they believe there should be a ‘do nothing’ option (55.1%).
- Direct representations were received from 2 organisations, Natural England, and the Royal Society for the Protection of Birds (RSPB).
- As Natural England is the Government’s statutory nature conservation adviser and regulator, the Council can only manage the beach in a way that is approved by Natural England. In their response they state that they are unlikely to support Option 1 - Access for all in its current form but have offered options for modification for further discussion with the Council. They do not support Option 2 – Amenity Beach due to the extent of vegetation loss outlined. They would like to continue working with the Council to get a good outcome for nature and people at Hoylake Beach.

2.0 Methodology

The consultation was carried out between 19 February – 25 March 2024. People were asked to indicate which of two Beach Management Options they supported and could provide context regarding their choice.

The approach used was an online public consultation through the 'Have your say' consultation portal at www.haveyoursay.wirral.gov.uk with a page dedicated to the Hoylake Beach Management Plan Consultation. Useful information provided on the site included maps illustrating the key features of each option, Frequently Asked Questions (FAQs) and a Document Library containing relevant reports, maps, and photographs.

An online questionnaire was provided for residents to engage with. Respondents were also able to request paper copies, help completing the questionnaire, or submit additional comments via a dedicated email address, which was published on the 'Have your say' website alongside the online questionnaire.

These findings will be included in a report that will go to a meeting of the Environment, Climate Emergency and Transport Committee in April 2024.

2.1 Questionnaire

The consultation questionnaire was developed around understanding levels of support for the two Beach Management options proposed for Hoylake Beach.

To enable further understanding, and in-depth analysis, respondents were invited to provide free-text comments to expand on their ideas or concerns.

Following closure of the consultation, the responses to each of the direct questions were collated and the responses included in this report. For the free-text comment questions, a text coding approach was used based on the reoccurring themes. This data was then collated and summarised in the report.

For those participants unable to complete the consultation online the option of completing a paper copy of the report. Any paper copies received are collated and added to the results received via the online survey and analysed together.

2.1.1 Analysis of Respondents

Respondents to the online survey and the paper copy survey were provided with the option to provide optional demographic information about themselves. It must be noted that this is an option and that not all respondents included this information. This data allows the demographic results to be included in this report to enable analysis of the scope of responses and representation from different demographic groups.



In order to complete the online survey participants were mandatorily required to provide their postcode. A postcode field was also included in the paper copy surveys for people to complete. The post code is used to analyse responses by geography.

2.1.2 Interpretation of Results

In terms of the survey results, it is important to note that:

- The public consultation is not representative of the overall population but provides information the opinion of those residents who engaged.
- The survey also included the opportunity to, optionally, provide free-text comments. These were reviewed and categorised to enable prevalent themes amongst the comments to be identified; comments often covered multiple themes. The percentages given are a percentage of respondents who made a comment. As they may have covered more than one theme in a comment, the total percentage may exceed 100%.
- In some cases results may vary from 100% by 0.1% this will be due to rounding of numbers.

2.2 In Person Information Sessions

Information regarding the Hoylake Beach Management Plan and the proposals was available to view in person. The sessions were held in Hoylake Community Centre on Tuesday February 27, 09:00-18:00 and Tuesday March 5, 09:00-18:00. At the sessions people were also given information and assistance on how to participate in the survey and provide their feedback.

2.3 Key Stakeholders

A number of key stakeholder organisations were contacted to directly advise them that a consultation was in progress and to give an opportunity for them to provide their feedback.

- Environment Agency
- Cheshire Wildlife Trust
- Wirral Wildlife
- HM Coastguard
- Natural England
- North West Fisheries Inshore Conservation Authority
- Royal National Lifeboat Institute (RNLI)
- RNLI Hoylake Lifeboat
- Royal Society for the Protection of Birds
- United Utilities Water Limited



2.4 Communication

The consultation was promoted through a mix of organic and paid media channels. This included:

- Consultation page and survey on Have Your Say website.
- Organic social media post on council's corporate accounts:
 - Facebook: 2 social media posts with 63,264 impressions 6,099 engaged users 2,423 clicks.
 - LinkedIn: combined data of 2 posts; 5,845 impressions 489 engagements 445 clicks.
 - X (Twitter) threads: 2 posts, 74,615 impressions 2,026 engagements 331 clicks.
- Media releases issued to local print and digital media and stories then featured in Birkenhead news, Liverpool Business News, Liverpool Echo, The Chester Standard, West Kirby Today, and Wirral Globe.
- Media adverts promoting consultation and information display placed in Liverpool Echo, Merseyside Metro and Wirral Globe printed newspapers.
- Banners placed on promenade railings at Hoylake beach.
- Posters produced promoting consultation and information display.
- 2 Wirral View news articles; 911 page views.
- Resident email with details of consultation sent to over 21,000 email addresses.



3.0 Results

3.1 The Questionnaire

The questionnaire was responded to by 1125 people. 1003 responses came through the online portal and 122 paper copies were completed.

The survey consisted of a mandatory, single select question asking which of the proposed Beach Management option was preferred, and an option to choose neither. Demographic data including postcode was collected upon registration to allow examination of results by geography.

The survey also included the opportunity to, optionally, provide free-text comments. These were reviewed and categorised to enable prevalent themes amongst the comments to be identified; comments often covered multiple themes. The percentages given are a percentage of respondents who made a comment. As they may have covered more than one theme in a comment, the total percentage may exceed 100%.

3.1.1 Beach Option Question

This question was mandatory, so all 1125 people answered this question. Respondents selected the one option that they preferred as a Beach Management Plan.

The most supported option was Option 2 – Amenity Beach with 67.2% of respondents preferring this option. 26.6% of respondents preferred Option 1 – Access for All and 6.2% did not know which they preferred.

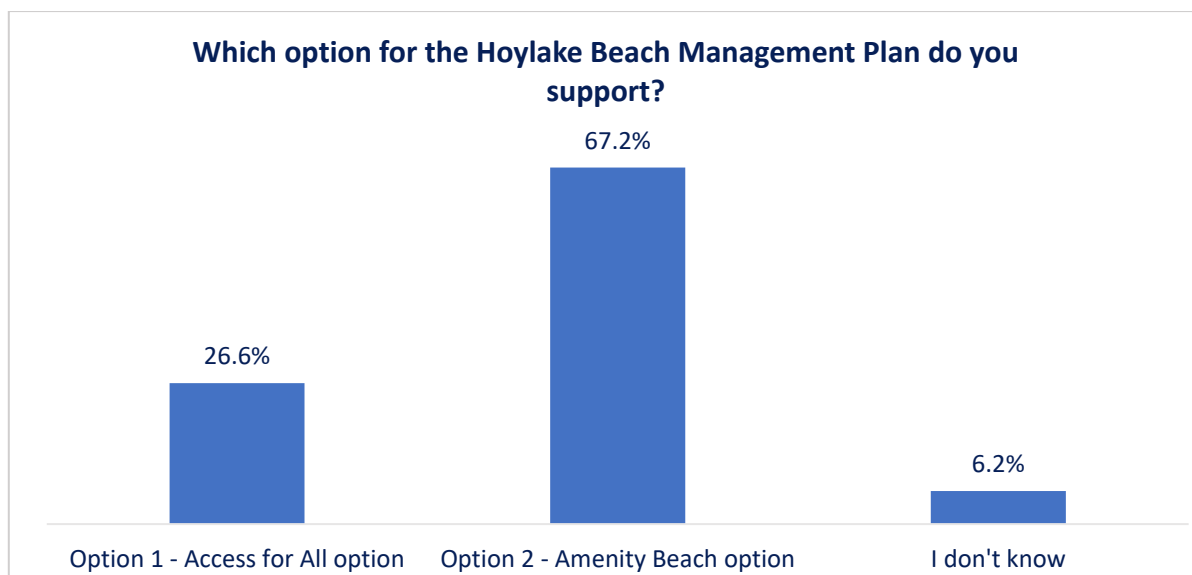


Figure 1: Which option for the Hoylake Beach Management Plan do you support?



1. Which option for the Hoylake Beach Management Plan do you support?	Total	%
Option 1 - Access for All option	299	26.6%
Option 2 - Amenity Beach option	756	67.2%
I don't know	70	6.2%
Total	1125	100.0%

Table 1: Which option for the Hoylake Beach Management Plan do you support?

Postcodes provided by respondents were used to examine the responses by geography.

Most of the survey participants were Wirral residents (92.9%).

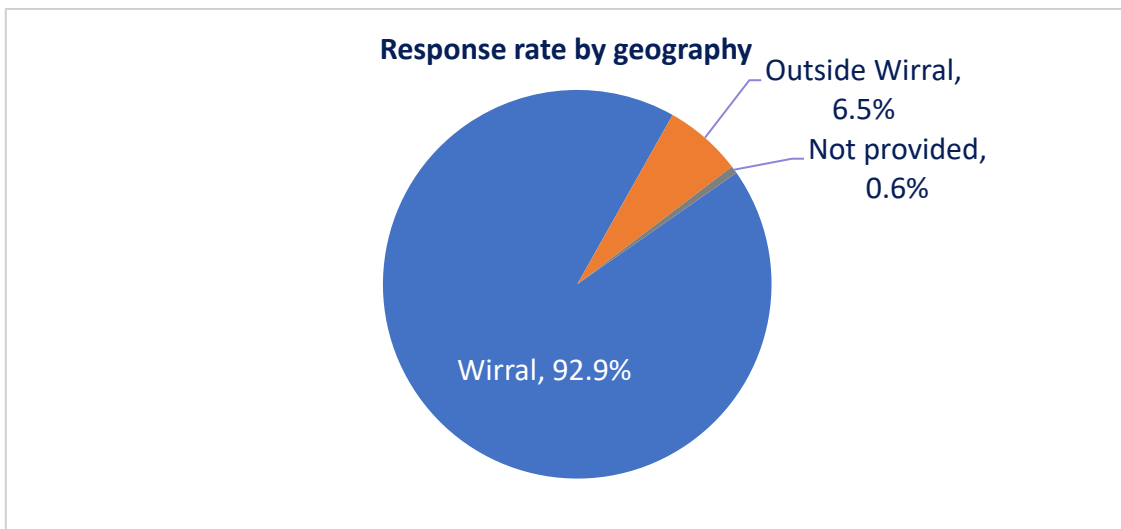


Figure 2: Response rate by geography.

Response rate by geography	Total	%
Wirral	1045	92.9%
Outside Wirral	73	6.5%
Not provided	7	0.6%
Total	1125	100.0%

Table 2: Response rate by geography.



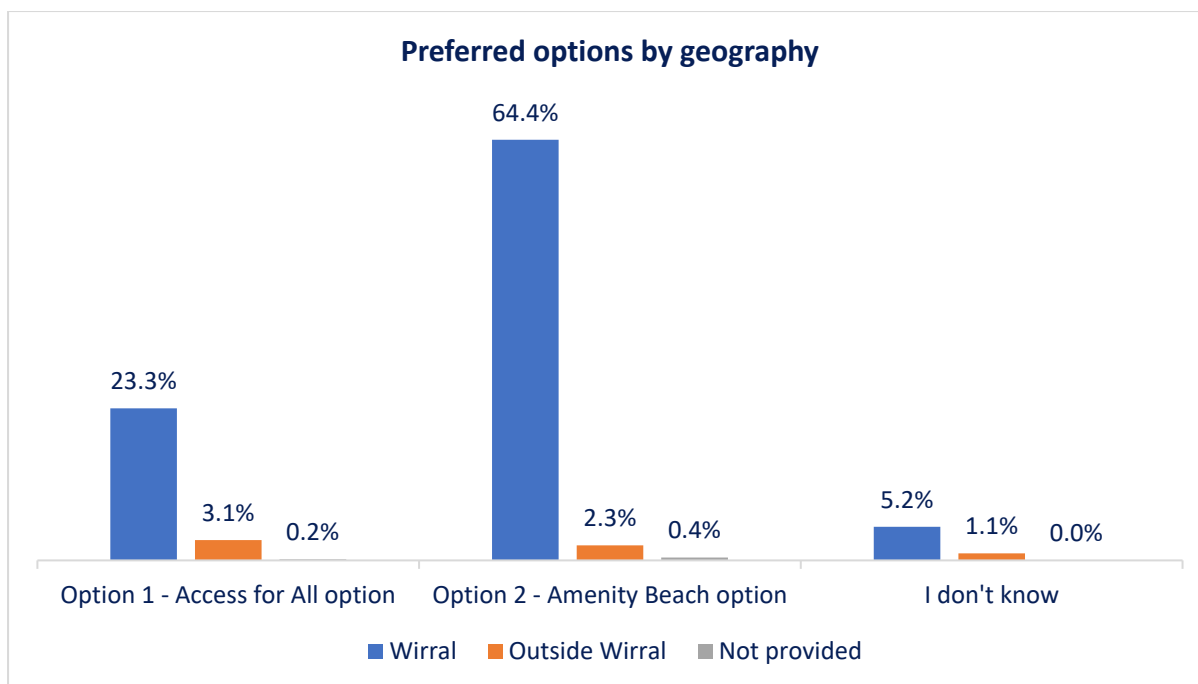


Figure 3: Preferred options by geography.

Geography	Wirral		Outside Wirral		Not provided		Total	
	Total	%	Total	%	Total	%	Total	%
1. Which option for the Hoylake Beach Management Plan do you support?								
Option 1 - Access for All option	262	23.3%	35	3.1%	2	0.2%	299	26.6%
Option 2 - Amenity Beach option	725	64.4%	26	2.3%	5	0.4%	756	67.2%
I don't know	58	5.2%	12	1.1%	0	0.0%	70	6.2%
Total	1045	92.9%	73	6.5%	7	0.6%	1125	100.0%

Table 3: Preferred options by geography. % results shown as a total of all responses.

Figure 2 and Table 2 show the combined results by different geographies and the percentage responses are shown as a total of all responses.

The responses can also be reviewed within geographical areas to provide further context regarding responses.

Wirral residents provided 1,045 responses. Of those 69.4% supported Option 2, 25.1% Option 1 and 5.6% did not know.

Those residing outside of Wirral provided 73 responses, of these 47.9% supported Option 1, 35.6% Option 2 and 16.4% did not know.

It can be noted that most of the respondents to this survey reside in the Hoylake and Meols ward. There were 690 responses from this ward out of a total of 1,125 (61.3%), and as such the results of this survey are weighted towards the opinions of those living within this ward.

Respondents living in the Hoylake and Meols ward of Wirral were more likely to support Option 2. Of the total Hoylake and Meols responses 77.1% supported Option 2, 17.2% supported Option 1 and 5.7% did not know.

3.1.2 Free Text Comments

The survey also included the opportunity to, optionally, provide free-text comments for the option that the respondent had chosen. These were reviewed and categorised to enable prevalent themes amongst the comments to be identified; comments often covered multiple themes. The percentages given are a percentage of respondents who made a comment. As they may have covered more than one theme in a comment, the total percentage may exceed 100%.



Why do you support Option 1 - Access for All option?

289 people chose to provide a reason as to why they support Option 1 – Access for All.

The top reasons, by category were:

- This option retains the most vegetation (69.2%).
- This option is an acceptable compromise, retaining wildlife whilst allowing for a sandy area of beach (13.8%).
- This option would involve less expenditure (13.5%).

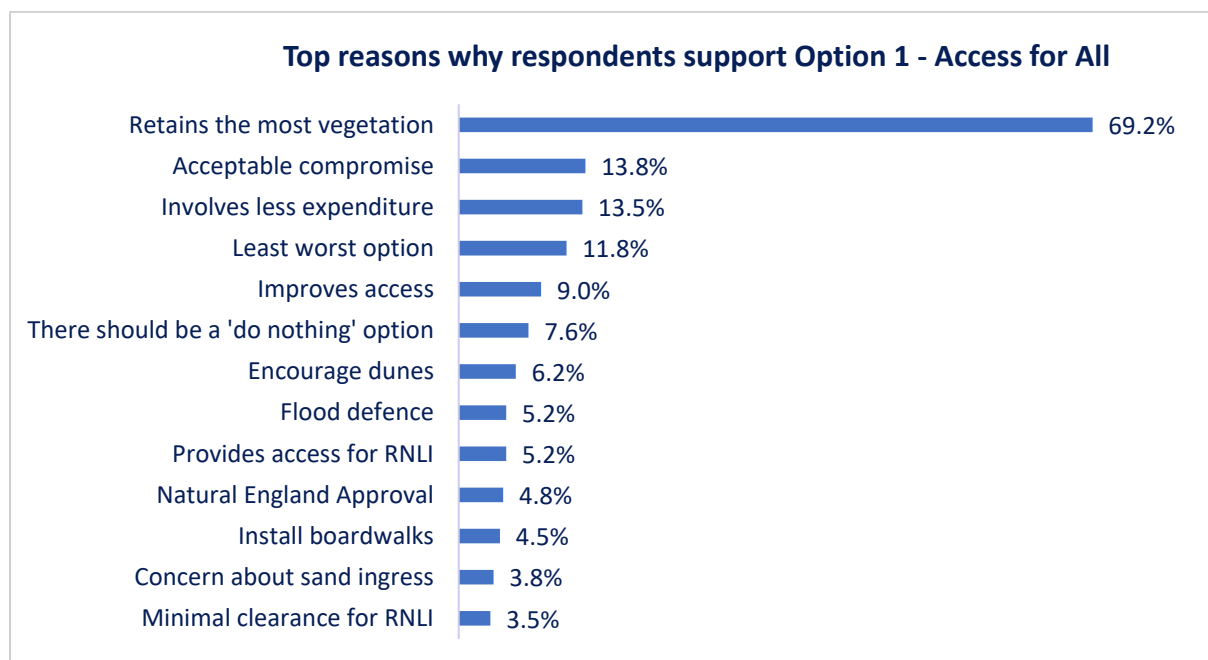


Figure 4: Top reasons why respondents support Option 1 - Access for All.

Why do you support Option 1 - Access for All option?	Total	%
Retains the most vegetation	200	69.2%
Acceptable compromise	40	13.8%
Involves less expenditure	39	13.5%
Least worst option	34	11.8%
Improves access	26	9.0%
There should be a 'do nothing' option	22	7.6%
Encourage dunes	18	6.2%
Flood defence	15	5.2%
Provides access for RNLI	15	5.2%
Natural England Approval	14	4.8%
Install boardwalks	13	4.5%
Concern about sand ingress	11	3.8%
Minimal clearance for RNLI	10	3.5%

Table 4: Top reasons why respondents support Option 1 - Access for All.

Why do you support Option 2 – Amenity Beach option?

730 people chose to provide a reason as to why they support Option 2 – Amenity Beach.

The top reasons, by category were:

- The beach will be available for recreational use, in particular for the use of families and children (32.3%).
- Although they have selected this option, they would actually prefer a fully maintained beach (25.3%).
- This option allows for the biggest sandy area out of the two options (24.2%).

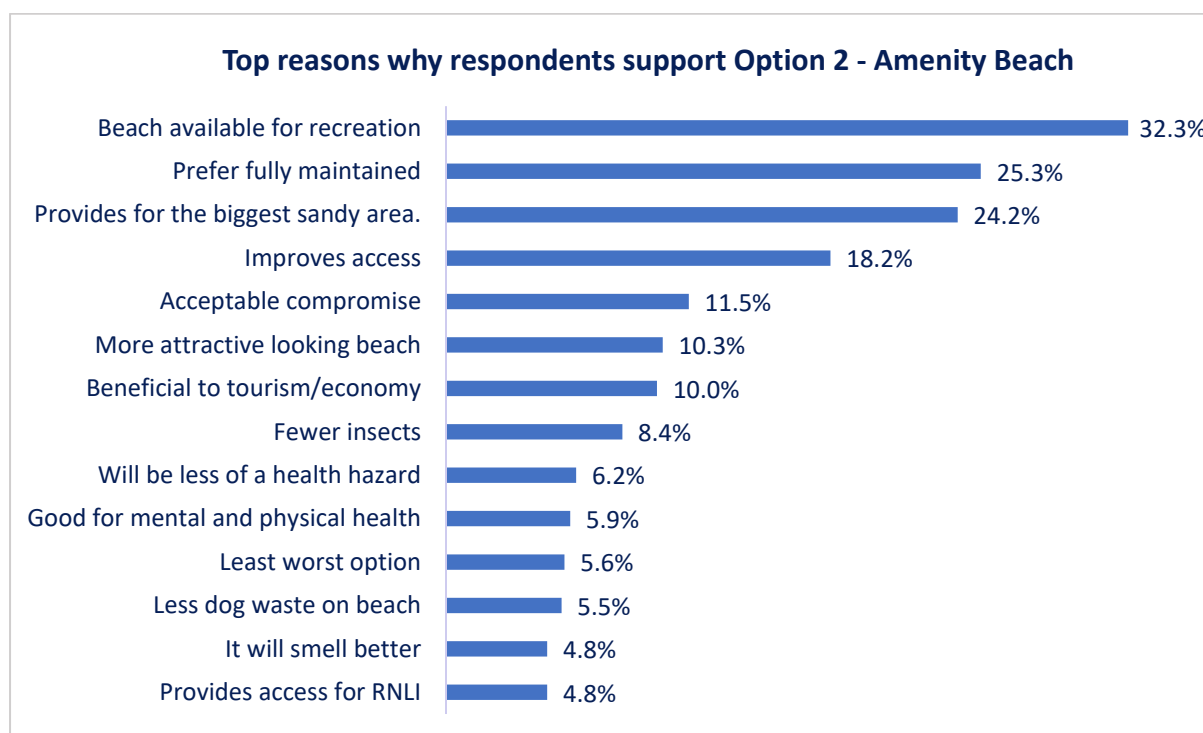


Figure 5: Top reasons why respondents support Option 2 - Amenity Beach

Why do you support Option 2 - Amenity Beach option?	Total	%
Beach available for recreation	236	32.3%
Prefer fully maintained	185	25.3%
Provides for the biggest sandy area.	177	24.2%
Improves access	133	18.2%
Acceptable compromise	84	11.5%
More attractive looking beach	75	10.3%
Beneficial to tourism/economy	73	10.0%
Fewer insects	61	8.4%
Will be less of a health hazard	45	6.2%
Good for mental and physical health	43	5.9%
Least worst option	41	5.6%
Less dog waste on beach	40	5.5%

Why do you support Option 2 - Amenity Beach option?	Total	%
It will smell better	35	4.8%
Provides access for RNLI	35	4.8%

Table 5: Top reasons why respondents support Option 2 - Amenity Beach

Why have you selected 'I don't know'?

69 people did not pick either Option 1 or Option 2 and instead selected 'I don't know'.

The top reasons, by category were:

- The belief that there should be a 'Do nothing' option where the beach is left to fully rewild due to the environmental benefits, benefits to flood defence and trapping in-blown sand (55.1%).
- Neither option is acceptable (42.0%).
- The only clearance of vegetation should be the minimum required for the RNLI lifeboats to launch (17.4%).

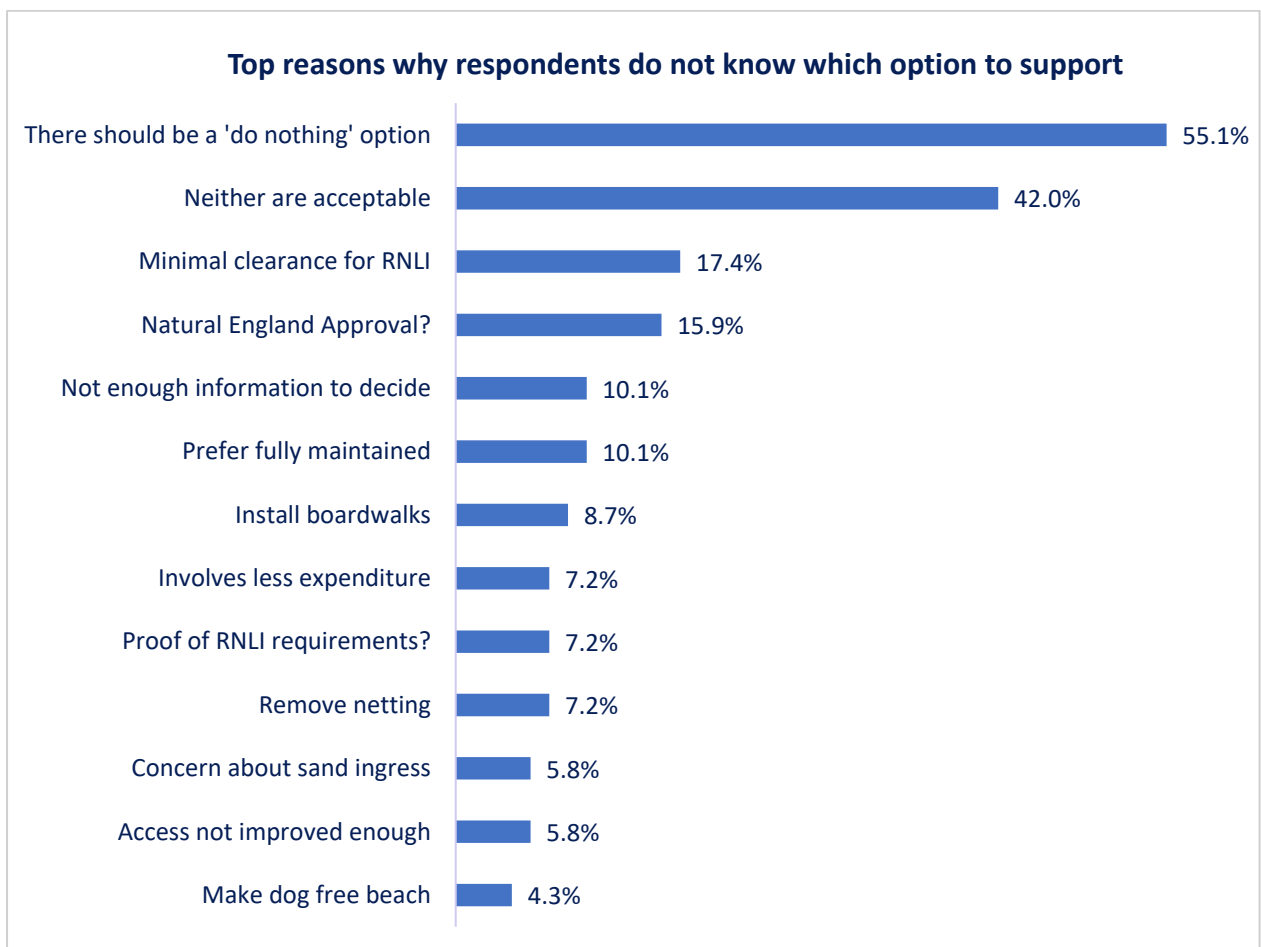


Figure 6: Top reasons why respondents do not know which option to support

Why have you selected 'I don't know'?	Total	%
There should be a 'do nothing' option	38	55.1%
Neither are acceptable	29	42.0%
Minimal clearance for RNLI	12	17.4%
Natural England Approval?	11	15.9%
Not enough information to decide	7	10.1%
Prefer fully maintained	7	10.1%
Install boardwalks	6	8.7%
Involves less expenditure	5	7.2%
Proof of RNLI requirements?	5	7.2%
Remove netting	5	7.2%
Concern about sand ingress	4	5.8%
Access not improved enough	4	5.8%
Make dog free beach	3	4.3%

Table 6: Top reasons why respondents do not know which option to support



3.2 Direct Representations

Two direct representation responses were received from key organisations. Both of these were provided from the key stakeholders contacted to advise of the consultation. The representations received are included in Appendix 1. The organisations that responded were:

- Natural England.
- Royal Society for the Protection of Birds.



4.0 Demographics and Site Traffic

4.1 Demographics

Registration was required to engage in the online Hoylake Beach management Plan consultation. The registration form included questions regarding demographics including gender, age group, ethnicity, and sexual orientation, however not all questions in the registration form were compulsory and respondents could choose to select 'prefer not to say' or skip the question. The demographics results are summarised below. The same questions were included on the paper-copy questionnaires.

Most respondents (87.7%) classed themselves as a local resident.



Figure 7: Who are you registering as?

The age group profile is illustrated below with the most common age groups being 55-64 years (27.7%), followed by 45-54 years (20.7%) and 65-74 years (18.5%). 16-24 years only made up 1.3% of respondents.

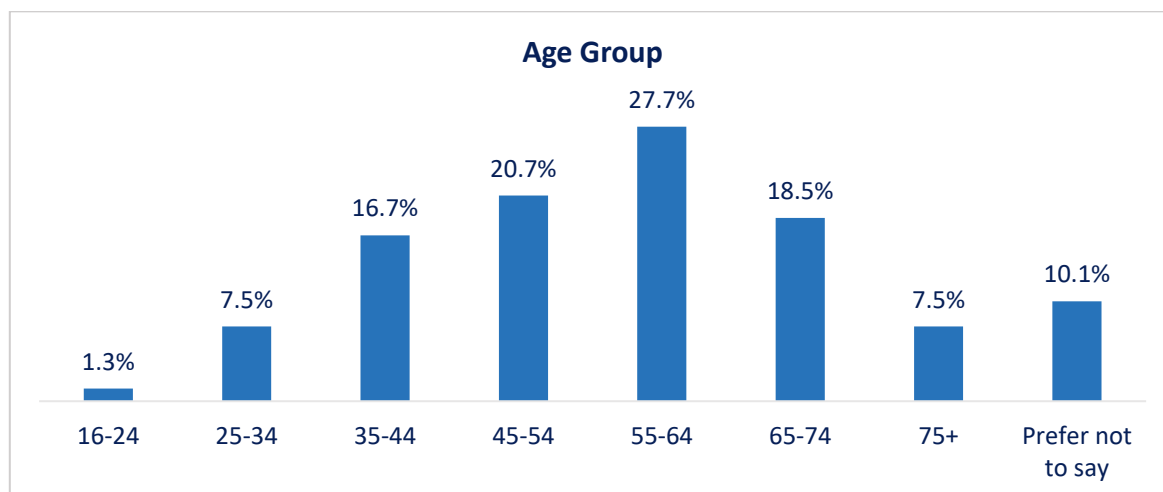


Figure 8: Chart displaying age groups



48.6% of respondents identified as female and, 39.5% male. 11.6% preferred not to say and 0.4% preferred to use their own term.

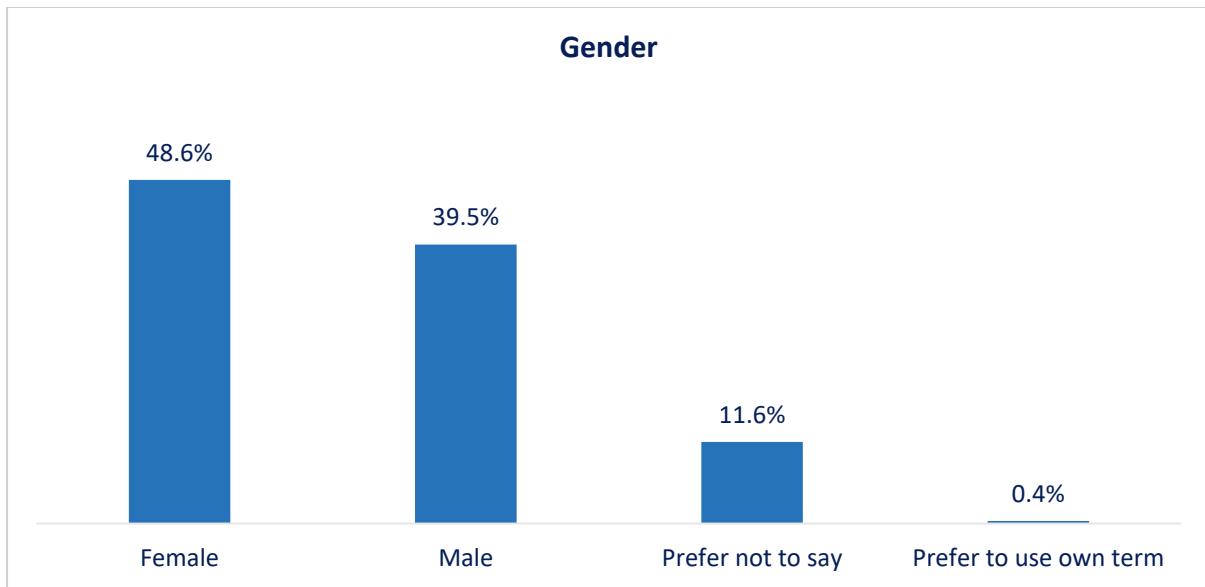


Figure 9: Chart displaying gender

71.6% of respondents were heterosexual, 1.5% were gay/ lesbian, 1.1% bisexual and 25.8% preferred not to say.

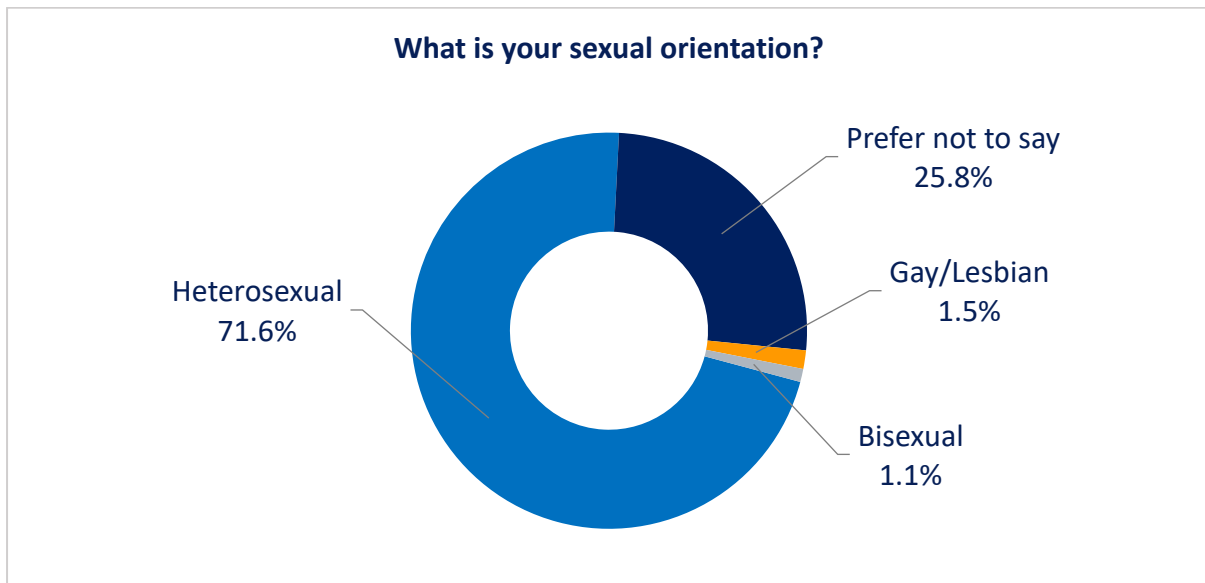


Figure 10: Chart displaying sexual orientation



54.9% said they did not have a disability whilst 4.8% of respondents said that they had a disability. 40.3% preferred not to say.

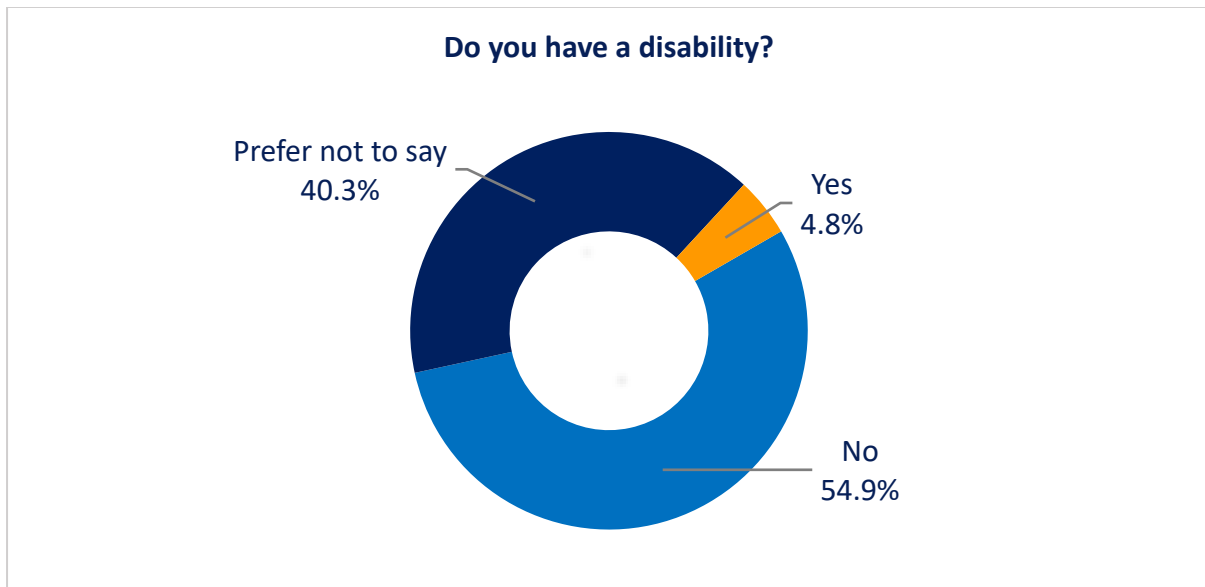


Figure 11: Chart displaying disability

The majority (84.9%) of respondents identified as White – English, Welsh, Scottish, Northern Irish, British.

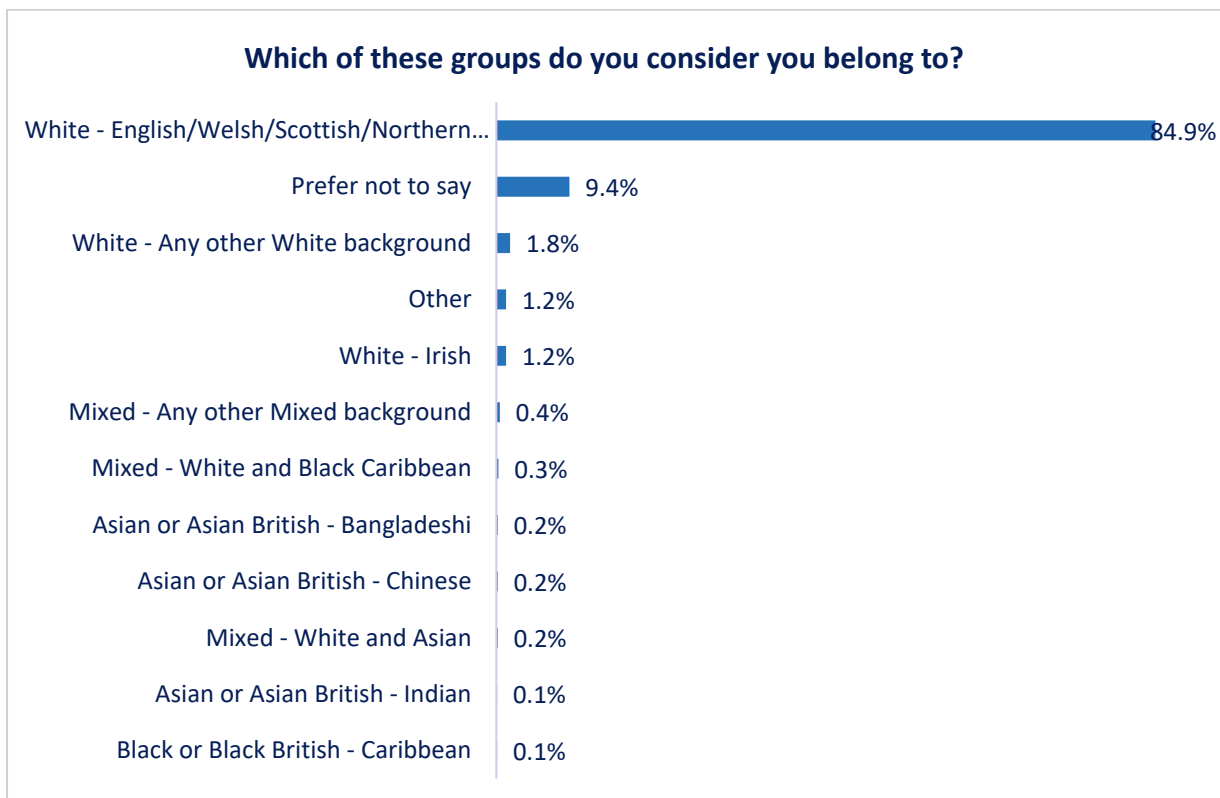


Figure 12: Chart displaying groups



The most represented ward was Hoylake and Meols (61.3%) followed by West Kirby and Thurstaston (6.9%). 6.5% of respondents lived outside of Wirral.

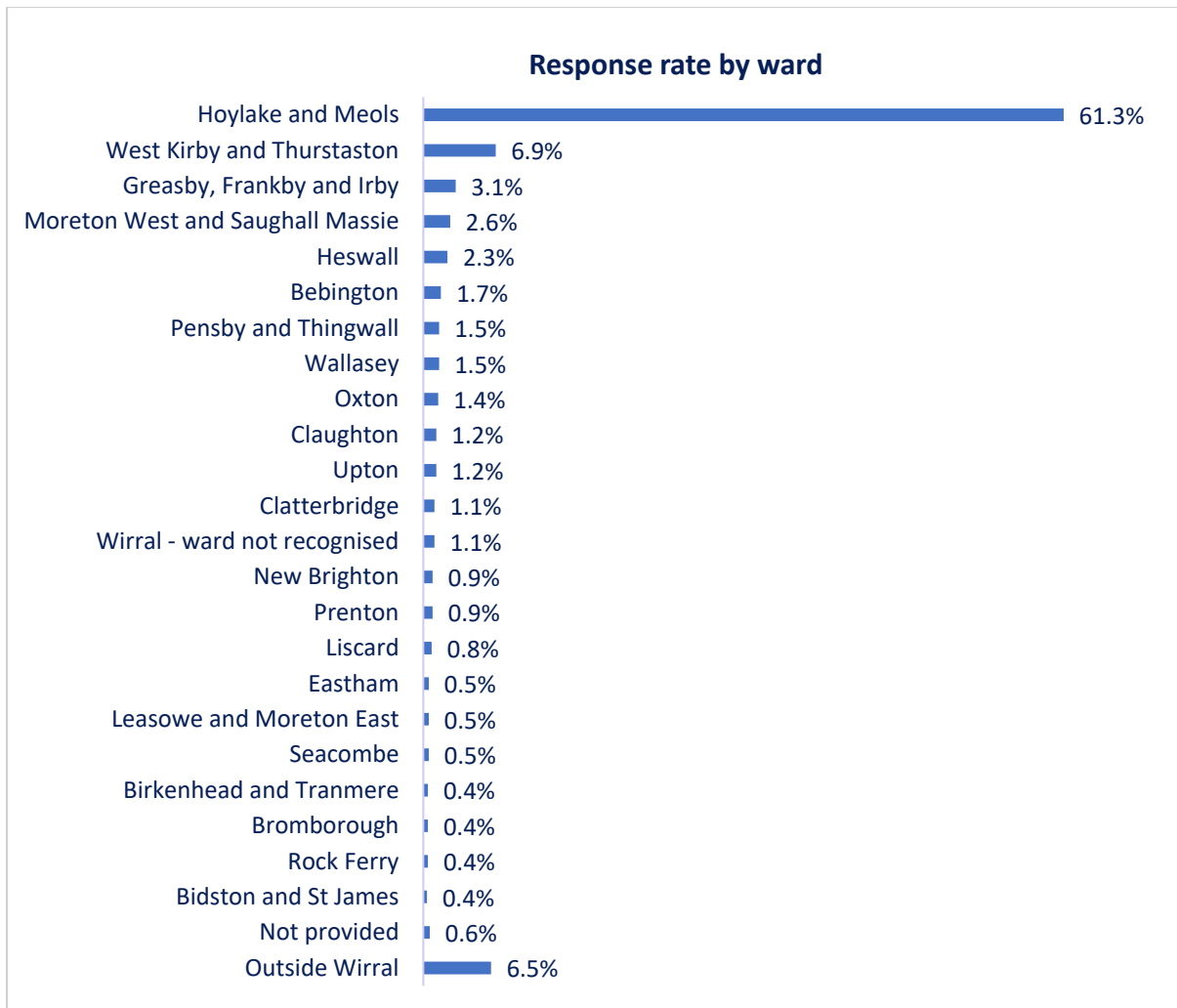


Figure 13: Chart displaying Wirral Ward representation



4.2 Have Your Say - Site Traffic

Reviewing the site activity, visits, and how people visit the site can be useful to evaluate if people are aware of the site, as well as to ensure engagement activities are deployed effectively, and to a wide range of different people – enhancing public engagement in the future. 5787 unique visitors viewed the Hoylake Beach Consultation Plan page on the Have Your Say site. Of these 1003 people completed the questionnaire.

These figures cannot be viewed as definitive as they are based on site tracking through ‘cookies’ and there are a number of factors that can impact on this. These include that cookies may be disabled or deleted, individuals may access the site multiple times through different devices or different browsers. However, the figures can be used to gauge how much interest has been generated in individual projects through the rate of engaged participants.

The route that people access the site is known as the traffic source. The ‘Have your say’ portal allows analysis to be carried out on traffic source, and if they lead to engagement in the site tools such as the questionnaire. This analysis allows a greater understanding of which communication and promotional tools to use to optimise engagement.

For this project a range of traffic sources have been reviewed and summarised in the table below. Most visits to the site were or direct visits where people typed the internet address into their web browser (32.3%) or from a link clicked in an email (24.1%).

Traffic/Channel	Aware visits		Informed visits		Engaged visits	
	Total	%	Total	%	Total	%
Direct	1,870	32.3%	568	29.3%	322	32.1%
Email	1,393	24.1%	460	23.8%	265	26.4%
Social	1,245	21.5%	412	21.3%	153	15.3%
Referrals	664	11.5%	199	10.3%	95	9.5%
Search Engine	443	7.7%	199	10.3%	114	11.4%
.GOV sites	172	3.0%	98	5.1%	54	5.4%
Total	5,787	100%	1,936	100%	1,003	100%

Table 7: Site traffic sources

An ‘Aware’ visitor has made a visit to the site but has not taken any further action.

An ‘Informed’ visitor has clicked on something within the page, perhaps opened a document, viewed an image or clicked a URL.

An ‘Engaged’ visitor has completed the survey.

Appendix 1: Direct Representations

Two direct representations received from Natural England and the Royal Society for the Protection of Birds are included below.





BY EMAIL ONLY

Cheshire, Greater
Manchester, Merseyside
and Lancashire Area
Team Natural England,
Crewe Business Park,
Crewe, Cheshire CW1
6GJ
Cheshire2.Lancashire
@defra.gov.uk

To whom it may concern,

Natural England are aware of the live Hoylake Beach Management Plan consultation. Natural England have chosen to submit their representation in writing to ensure our position is clear.

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.

Option 1 - Access for All option

It is unlikely that Natural England could support the extent of vegetation loss outlined in this option. With considerable modification and additional mitigation it may be something Natural England could consider, subject to the relevant tests and assessments being met. We would be open to further conversations with Wirral Borough Council around suitable modification and mitigation.

In order to be helpful, here are some examples of modification and mitigation which could be included but not limited to:

- Ensuring as much sediment as possible is shaken off from vegetation removed from the system to retain sediment.
- Use of best practice methods when using vehicles on a saltmarsh e.g. using appropriate vehicles for the terrain or removing vehicles from site when not in use.
- Ensure careful route management to reduce potential for compaction.
- Translocation of any protected plant species.
- Code of conduct should include information on what is happening at the beach in terms of vegetation development and why the beach profile is changing. Public engagement signs are recommended to explain the importance of the vegetation and it is an offence to remove vegetation without the correct permissions.
- Explore opportunities to promote good practice along the frontage for management of recreational disturbance.

Natural England have concerns regarding the 10 meter buffer strip, removal of vegetation at the sea wall and removal of dense vegetation. Natural England would want to be confident that the width of the buffer is

necessary for RNLI operations on the beach and so would need to see further evidence to justify this scale of clearance. Suitable evidence would include:

- the size of the vessels (width, length and clearance under the vessels).
- A clear map showing the slipways (primary, secondary, third and fourth) and how they are used, how often and labelling various location.

Natural England also has concerns regarding the clearance of slipways and the infilling of pools adjacent to the slipways which host significant stands of Northern/Sea Water Whorl Grass (*Catabrosa aquatica minor*).

Option 2 – Amenity Beach option

Natural England would not be able to support this option due to the extent of vegetation loss outlined.

To conclude, Natural England could not support either of these two options in their current state, however we would like to continue working with Wirral Borough Council to get a good outcome for nature and people at Hoylake Beach.

Yours

Amy Corthine
Coastal Senior Adviser
Cheshire to Lancashire Area Team
Cheshire2.Lancashire@defra.gov.uk



By email to hoylakebeach@wirral.gov.uk

23/03/2024

Dear Sir/madam

Re: Hoylake Beach Management Plan Consultation

I am writing in response to your above consultation on the Habitats Regulations Assessments (HRAs) of the 2 proposed options for future management of the beach at Hoylake.

As you are aware HRA are required because of the designated sites within which the beach sits, and because of the potential for habitat loss and damage affecting the Dee Estuary SAC, and Mersey Narrows and North Wirral Foreshore SPA and Ramsar site, and the HRAs must be conducted in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017, as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

As a principle of the environmental legislation protecting these sites, we would argue that any vegetation removal should be kept to the absolute minimum to enable essential services to function. In this context, based on the information provided, we **favour adoption of Option 1 - Access for All**, noting that this covers only removal of the vegetation required to facilitate safe operation of the Hoylake Lifeboat. Nevertheless, we are concerned that the full effects of this option have not been fully assessed in the HRA and therefore, without further assessment, we consider that a conclusion of no adverse effect on the integrity of the protected areas (in particular the Dee Estuary SAC) cannot currently be reached.

Option 1 would result in the removal of 1.42ha of beach vegetation, compared to that within the Amenity Beach option which would result in the removal of 2.53ha of Atlantic salt meadows (a Dee Estuary SAC Qualifying Feature). However simply basing an assessment on the metric area of loss alone, or the percentage it represents of the overall site area without context, is an inaccurate and inappropriate approach to the assessment of impact on the integrity of the protected sites.

Clearly, even a small loss of a key part of a site could have a disproportionate effect on the functional integrity of the site. Furthermore, we note that there is no assessment of the impacts of the clearances on the remaining designated features of the SAC on this

RSPB England
Lancaster office
7.3.1 Cameron House
South Road, White Cross Estate
Lancaster, Lancashire
LA1 4XF

Tel: 01524 581001
Facebook: @RSPBEngland
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Email:
lancasterofficeadmin@rspb.org.uk
rspb.org.uk



The RSPB is part of BirdLife International, a network of passionate organisations, working together to save nature across the world.

basis, just an acknowledgement of the area that will not be cleared. Similarly, there has been no consideration of the proposed management in the context of the dynamic nature of the SAC habitats that is clearly evident, nor of the effects of the proposals on the wider coastal processes in the area.

We have set out our more detailed concerns and comments below, which are applicable to both options 1 and 2.

Potential erosion of rock armour

Continued vegetation management and sand removal around the lifeboat station will also lead to some negative consequences within this area e.g., vegetation removal around the lifeboat station could increase tidal energy. If this leads to beach scour in storm events, then it could start to undermine the existing rock armour causing slumping. Retaining vegetation away from defined access points would help to protect the lifeboat station.

Pioneer saltmarsh within the SAC

The Amenity Beach option (which we do not consider to be justified) would result in the removal of 2.53ha of Atlantic salt meadows and the Access for All option would remove 1.42ha of the same. The HRAs place great emphasis on the fact these areas are A) additional to the habitats present at the time of designation and that B) they are a small percentage of the overall feature within the SAC (0.14% and 0.08% of the current extent respectively). To take these points in turn:

- A) Much of the vegetation consists of pioneer saltmarsh at present. Pioneer vegetation is by its nature ephemeral, and therefore it does not make sense to only consider the vegetation communities where they were present at the time of designation. Furthermore, this area is effectively a green beach at present and left undisturbed is likely to transition towards strandline and pioneer dune vegetation – this is already occurring as shown by the presence of species such as Prickly Saltwort, Ray’s Knotgrass, Sand Couch, Sea Holly and Sea Rocket (all recorded in the last two years).

- B) It is true that the vegetation communities currently present are a small proportion of the overall saltmarsh vegetation. However, they are a much more significant proportion of the overall extent of pioneer saltmarsh vegetation across the SAC. If development towards strandline and foredune communities continued (without the proposed intervention), then these habitats could eventually comprise a significant proportion of the overall extent of these habitats within the SAC.

The HRAs state that “Vegetation coverage across the BMP area is not continuous, with much of the vegetation density across the area being less than 10%” (Section 3.1.2).

RSPB England
Lancaster office
7.3.1 Cameron House
South Road, White Cross Estate
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This misses the point that currently unvegetated or sparsely vegetated areas will, in time, become vegetated if succession is/was allowed to continue. Table 3.1 (Extent of vegetation and vegetation removal within the BMP area) only considers loss of current vegetation but, the actual impact of the management would we suggest, be larger than that shown within the table as both within and outwith the managed areas, vegetation development will not occur as it would if allowed to develop naturally.

Embryonic dunes

Whilst it is likely that some management of windblown sand will be required, it is good to see acknowledgement under this option (3.4 in the HRA) (at least partly) that vegetation can play a key role in trapping sand on the shore and therefore reducing the issues inland. A really key point is that the natural processes driving the recent changes are unlikely to alter anytime soon and therefore, any work undertaken that reduces vegetation communities and impedes natural succession is likely to lead to further issues inland, extending the need to remove larger amounts of windblown sand.

Lidar analysis has apparently shown significant sand accretion between 1987 and 2020. This has raised areas of the beach above the reach of many spring tides, and this will be a key factor behind the increasing vegetation on those areas of beach as they become more terrestrial than intertidal.

Linked to the above point, many of the species recorded in recent years are intolerant of brackish conditions. There are vast stands of Marsh Arrowgrass *Triglochin palustris* on the upper beach (Whorl-grass *Catabrosa aquatica subsp. minor* also occurs here). Both species are indicative of freshwater and intolerant of saline conditions. This provides evidence of regular freshwater flow on to the upper beach and potentially increasing protection from tidal inundation due to embryo dune development on the shore. It is, therefore, also likely that the upper beach will remain wet, with or without vegetation except for where sand continues to build up. The HRAs state (Section 2.2.2) that *"This area seemed to sit wetter than the lower marsh (west), with a stronger freshwater influence, with the substrate appearing more silty than sandy"*.

Code of Conduct

The proposed Code of Conduct is welcomed and within the HRA is repeatedly referenced as being *"to ensure that everyone conducts themselves in a safe, sensible and sustainable manor while enjoying the beach"*.

We would like to make the point that, we don't know any examples from site managers which show that codes of conduct make any difference to behaviours without an element of enforcement / public engagement and note that, issues caused by human

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activities have been highlighted as one of the two key factors threatening the current saltmarsh extent –

'Saltmarsh and transitional/terrestrial vegetation communities established seaward of the seawall in Unit 1 of North Wirral Foreshore SSSI were surveyed to inform Condition Assessment of the saltmarsh feature following Common Standards Monitoring guidelines. The survey was carried out by NE staff on 28th September 2021.

The saltmarsh feature was assessed to be favourable but with the following threats that could affect condition:

- *Unconsented vegetation removal*
- *Recreational pressure (trampling)/dog fouling¹*

We note too that the overall assessment for the unit was unfavourable – declining, when assessed in 2021. This means, that the special interest of the SSSI unit is not being conserved, and importantly, will not reach favourable condition unless there are changes to site management or external pressures and that, the site condition is becoming progressively worse.

In summary

Natural, dynamic coastal habitats are rare and important in both the UK and European context. All the strandline and foredune NVC communities (SD2 – SD6) are uncommon in the UK and correspond with the EUNIS (European nature information system) habitats, H2110 (Embryonic shifting dunes; Shifting dunes) and H2120 (Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Shifting dunes with marram) which are designated SAC features.

These habitats are likely to develop at Hoylake if the vegetation is left undisturbed and will provide ecosystem services by trapping windblown sand and reducing the likelihood of coastal flooding, thereby reducing local issues. In a climate and nature emergency, such as that we are currently in, we should be celebrating situations such as this where new priority habitats are forming and developing naturally, helping in some small degree to offset ongoing losses elsewhere.

We appreciate the requirement from the RNLi to manage certain areas of the beach in the interests of health and safety associated with their operations, and thereby accept the justification for the management proposed under Option 1, over the more damaging and unjustified Option 2. Nevertheless, the full impacts of these proposals must be more thoroughly assessed in order for the proposals to pass the strict tests of the Habitats Regulations. This includes the need not only to consider the SAC vegetation communities that are currently present, but also those that are likely to develop based

¹ <https://designatedsites.naturalengland.org.uk/UnitDetail.aspx?UnitId=1013417>

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on current environmental conditions and the presence of indicator species and the current management regime (or lack thereof).

Following a thorough impact assessment of the final proposal, including any mitigation measures, if a conclusion of no adverse effect on integrity of any of the internationally protected sites cannot be reached, then the Council will need to demonstrate that there are no less damaging alternative solutions and reasons of overriding public interest, in addition to providing compensatory measures, in order to meet the requirements of the Habitats Regulations. We trust that Natural England's views on this matter are being sought.

We hope that these comments are helpful and would be happy to comment on the Council's final management plan and HRA for Hoylake Beach.

Your sincerely



Jeremy Sutton
Senior Conservation Officer – North West England

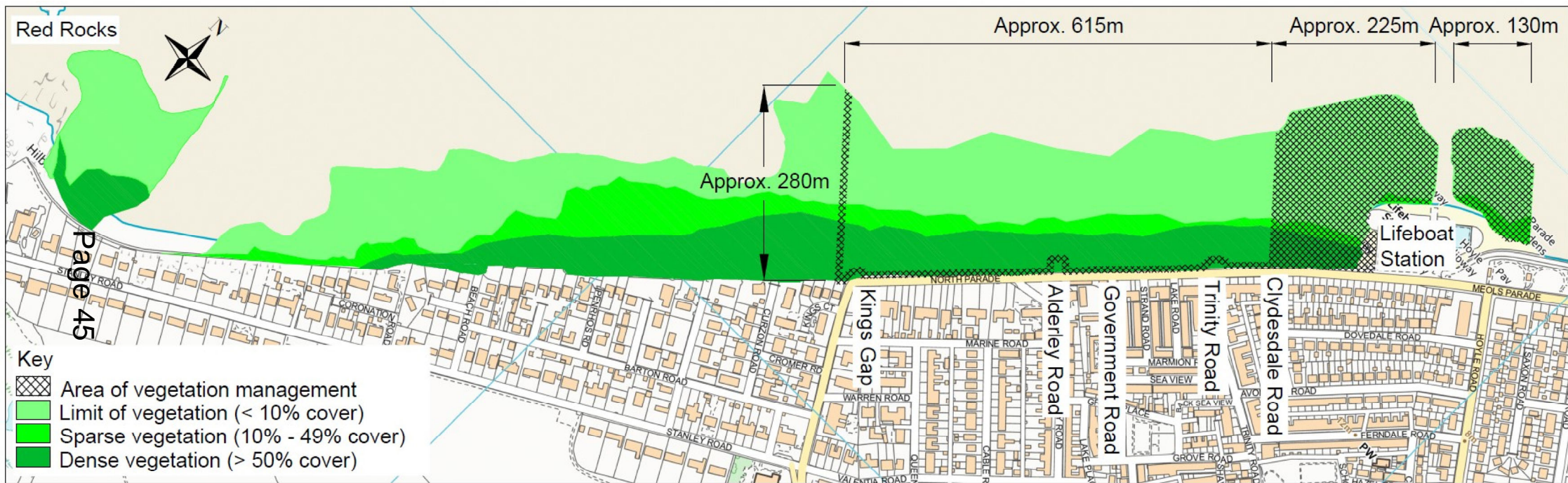
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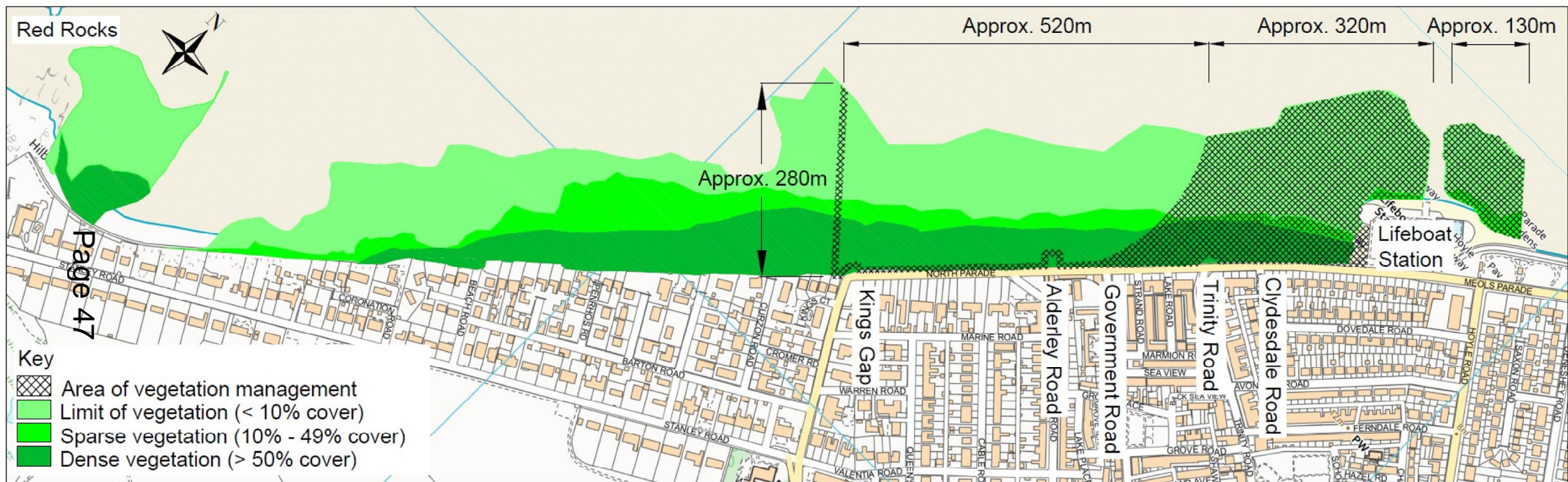
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Vegetation Management - Access for All Option

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Vegetation Management - Amenity Beach Option

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Ordnance Survey 100019803

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Mr Jamie Chestnutt
Director of Engineering and Supply
RNLI
West Quay Road
POOLE
BH15 1HZ

Wirral Council

David Armstrong
Assistant Chief Executive
PO Box 290
Brighton Street
Wallasey
Wirral
CH27 9FQ

www.wirral.gov.uk

Date: 4 October 2023

Your Ref:

Our Ref: DA0065 /DC

Service: Neighbourhood Services

Dear Mr Chestnutt,

WIRRAL COUNCIL & HOYLAKELIFEBOAT MEETING 14 SEPTEMBER 2023

I met with your RNLI Area Lifesaving Manager for North West England, Lee Firman at Hoylake Lifeboat Station on 14 September 2023. Also in attendance was the local lifeboat Coxswain Howie Owen. You may know that Wirral Council is developing options for the management of Hoylake Beach and as part of that process is keen to fully understand the requirements of key stakeholders such as the RNLI so that their essential lifesaving activities can continue without any detrimental impact from the management options under consideration.

The beach management options and supporting Habitat Regulations Assessments will be put forward for public consultation, be considered fully by the council's committee system and also be subject to scrutiny by Natural England. The options that go forward will therefore be subject to significant public scrutiny and challenge and I am keen to ensure that the options can be defended robustly in that they meet the requirements of our Environment, Climate Emergency and Scrutiny Committee, the conservation tests and priorities applied by Natural England and meet the requirements of key stakeholders.

I had previously met with Lee Firman and Dave Whitely of the Hoylake Lifeboat Station in June this year and mapped out some draft requirements for operations relating to launch and recovery of the lifeboat and also hovercraft. The second meeting in September was useful as it refined some of those requirements and improved my understanding of how the absence of management at present is impacting on Hoylake Lifeboat operations and also the volunteer crews. The draft notes of the meeting are attached which provide more detail on these discussions.

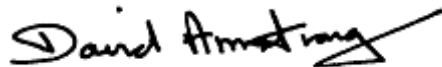
The meeting was also interesting as we had an opportunity to discuss some of the particular characteristics of Hoylake Lifeboat Station that perhaps make the combination of all its operations unique within the country. The recent significant financial investment in the Lifeboat Station and equipment was also discussed.

The meeting concluded with the primary action falling to the RNLI to set out their local operational requirements with approval from both a regional and national perspective. In doing this you should be mindful of Natural England's advice on the evidence that they would expect to be provided in support of those requirements:

- Provide evidence they can't approach from their normal slipway at certain times of the day (for example due to tide/wind direction/daylight hours)
- Provide data on how often they use different approaches and access routes.
- Proof they utilise routes and how often.

It would also be useful if you provide a full summary of your lifeboat and hovercraft operations and assess these against the three bullet points above, perhaps through the provision of a worked example with supporting launch, tide and weather data. I'd also be grateful if Lee Firman could let me have any comments on the draft meeting notes or accept them as an accurate record. The notes will be used to support the evidential requirements set out by Natural England.

Yours sincerely

A handwritten signature in black ink that reads "David Armstrong". The signature is written in a cursive style with a long horizontal stroke extending to the right.

David Armstrong
Assistant Chief Executive

**Hoylake Beach Management Plan
RNLI Meeting**

Date: Thursday 14th September 2023

Time: 10:30 – 11:30

Venue: Hoylake Lifeboat Station

Invited Attendees		
1. David Armstrong (WC)	2. Mike Cockburn (WC)	3. Neil Thomas (WC)
4. Martin Jones (WC)	5. Sarah Wardle (WC)	
6. Jamie Gardiner (Haskoning)	7. Luke Evans-Jones (Haskoning)	
8. Lee Firman (RNLI)	9. Howie Owen (RNLI)	

1. Introductions, Attendees and Apologies

All parties introduced themselves:

David Armstrong, Wirral Council, Assistant to the Chief Executive
Mike Cockburn, Wirral Council, Assistant Director Climate Emergency & Environment
Neil Thomas, Wirral Council, Senior Manager Flood & Coastal Risk Management
Martin Jones, Wirral Council, General Parks Manager for Hoylake
Sarah Wardle, Wirral Council, Merseyside Partnership Coordinator (Note taker)
Jamie Gardiner, Royal Haskoning DHV, Consultant
Luke Evans-Jones, Royal Haskoning DHV, Consultant
Lee Firman, RNLI, Area Lifesaving Manager
Howie Owen, RNLI Hoylake Lifeboat Coxswain

2. Summary of Position

DA set out that the Council is preparing a beach management plan that will eventually go to Natural England for approval. As part of the development of that plan we need to understand which parts of the beach need to be clear for the RNLI to operate their equipment. Natural England have stated that lifesaving activities take priority over conservation interest. So the understanding of what the RNLI requires needs to be clear and Wirral Council would like National and Regional sign off of those requirements.

MC added that if certain thresholds are met then Natural England may approve the beach management plan.

JG tabled plans which had been developed based on the understanding of RNLI operational requirements. JG explained that Natural England will need justification for their requirements.

DA & LF agreed that the two different vessels (lifeboat and hovercraft) should be considered separately as there are different risks to the operations of both vessels. HO explained that the hovercraft has 4 legs on the bottom and it's easy for the legs dig into vegetation humps and stop suddenly. Launching the hovercraft in the dark causes problems and the vegetation humps can't be seen.

LF explained that by coming to a halt in this manner can

- Increase the likelihood of damage to the hovercraft
- Increase the risk to the crew as they can be thrown out of the hovercraft
- Increase the risk to the life saving operation because it introduces delay

NT explained that Natural England had provided advice on the proof / evidence that would need to be provided by the RNLI in support of their operational requirements:

- Provide evidence they can't approach from their normal slipway at certain times of the day (for example due to tide/wind direction/daylight hours)
- Provide data on how often they use different approaches and access routes.
- Proof they utilise routes and how often.

DA suggested a working example of the working practice for certain conditions.

HO & LF agreed that they have the data regarding launching during certain conditions however the launch location is a decision made on conditions at the time. DA asked whether launch nearer the lifeboat station was preferable. HO agreed it was.

DA asked whether the old slipway at Alderley Road could be used for recovery. LF explained that it couldn't because it would damage the lifeboat.

NT asked whether recovery track could be located seaward of the existing vegetation. HO & LF explained that this wasn't possible as there would be delay waiting for the tide to drop and that the needs of the crew need to be considered. The view of the ground is also poor.

JG asked whether the 25m strip from the seawall was necessary for recovery. LF & HO confirmed that 25m is not necessary and a 10m strip is suitable for recovery operations.

NT asked whether the provision of a clear strip of beach will provide the necessary accessibility for the lifeboat and hovercraft. LF confirmed that it would also allow for recovery.

NT said that there may be plants growing immediately against the wall which are protected. Would a 2 or 3 metre buffer between the wall and the 10m clear strip work for the RNLI?

HO said that would be OK.

DA summarised the RNLI concerns in 3 key points

1. The impact of the vegetation growth and the ability of the RNLI to operate with their current equipment
2. The impact on lifesaving response
3. Current approach to operating could have the capacity to increase risk to life

HO confirmed that RNLI crews are currently waiting an additional 2 hours for recovery because conditions inshore are no longer suitable and to avoid conflict with the public. HO stated the crew are volunteers who have normal working lives and this additional time is not acceptable.

DA and LF discussed recent investment in the lifeboat station, and equipment and calculated it was approximately £7m. MC asked whether the station could continue to operate if access isn't maintained. LF explained that the RNLI may need to adapt operations and that this could negatively impact on operations. The Coastguard would need to be informed that Hoylake was not available.

DA asked whether the video provided by the RNLI could be shared with Natural England. HO confirmed that it could and added that if the site is left unmaintained it could result in damaged vessels. MC asked whether the implication of damaged vessels was that they would be inoperable? HO confirmed that was correct.

JG asked whether the strip to the east and west of the lifeboat station was correct for launch and recovery.

NT explained that the Council are looking to consult on 2 beach management options:

- An amenity beach between the RNLI station and Trinity Road
- Do minimum but with improved access for all.

At the moment the RNLI requirements have been mapped on the west side as far as Trinity Road and this has effectively removed the do minimum option. So we are looking for some clarity on whether the Trinity Road extent is required by the RNLI

LF & HO identified Clydesdale Road as the limit of the RNLI operational requirements. DA & MC explained that the improved access for all would include the RNLI operational requirements

3. Next Steps

NT asked how RNLI will provide evidence of their operational requirements.

LF said RNLI can provide service call locations and launches for the last 5 years.

DA suggested the RNLI provide a full introduction to their operations detailing both lifeboat and hovercraft use. The statement should identify how the efficiency of lifesaving operations are impacted by the vegetation on the foreshore.

NT asked Haskoning to update the plans for vegetation removal based on the discussions at this meeting.

LF confirmed that he can set out the Hoylake Lifeboat operational requirements and share with National RNLI for their approval.

DA also suggested a working example showing why the request is necessary.

NT talked through the programme timeframe. RNLI response is need by end of September. This will allow Haskoning to finish the Habitat Regulations Work and support the management options with the RNLI evidence. Haskoning will submit the HRAs with RNLI evidence to Natural England for advice. If a favourable position is identified with Natural England then public consultation on the two options can begin, with committee approval on the preferred option around Christmas or early New Year

4. Any Other Business

HO asked about the sand build up at the west slipway. It is currently passable for the hovercraft but the sand is preventing the large boat being recovered there with the cradle.

DA asked whether this was a key health & safety issue. Once made aware there is a position of responsibility. DA asked whether we could ask Natural England if we can move the sand.

NT said there is still a process around Habitat Regs to follow but would ask Haskoning to look at the HRA requirement there so we can act prior to the beach management plan implementation.

28 October 2023

Mr D Armstrong
Assistant Chief Executive
Wirral Borough Council
PO Box 290
Brighton Street
WALLASEY
CH27 9FQ

Dear David

We write in relation to the beach area that bounds our Hoylake lifeboat station to seaward, specifically the changing beach environment and the spread of vegetation. Since the cessation of Wirral Borough Council spraying control methods, we are increasingly concerned about the safe and continued effective use of these areas by our staff, volunteer crews, and lifesaving equipment.

Our submission intends to offer a more comprehensive understanding of the lifesaving service we provide from Hoylake, the equipment we supply to our crews and the safe operating methods designed into the station. Whether for training, or launching on a lifesaving mission, access is required to and from the beach via slipways: a primary north-facing slipway and a second (located away from the boathouse) for use in periods of extreme weather (unpredictable) or tidal conditions (predictable), or if the primary is out of service. Another slipway at the east-side of the station is employed for other aspects of launch and recovery operations. Whilst several, separate launch options may appear to be an overengineered solution, all are vital to the continuation and safety of our lifesaving procedures, as without unrestricted access to the sea, our mission to save lives at sea would fail.

Slipway utilization

The primary slipway, facing north, is utilised in over 95% of launch and recovery operations. It provides a straight, primarily firm, and level traverse across the beach to the water's edge, after which the lifeboat can be launched from its carriage rig and speed to the scene of any rescue. For recovery, once the boat is 're-carried', the rig can traverse the same track back to the station and rehouse via the same slipway.

The second slipway is a short distance from the station to the west, at "King's Gap". Operations from this locale allow the launch and recovery of the Shannon class lifeboat when the primary slipway is unavailable; for example, poor weather and / or water conditions such that a safer, expeditious launch and recovery can be achieved from here. Moreover, the King's Gap permits the lifeboat to be safely recovered during high tidal events, as this location does not require a wait of over 2 hours for the tide to have sufficiently ebbed to allow for a recovery. This secondary recovery site also allows the crew to safely reach the shore in poor weather conditions some 2 hours earlier than would be possible at the primary slipway. Once recovered, the lifeboat is brought to the station parallel to the promenade wall and rehouse.

The Inshore Rescue Hovercraft (IRH) is launched and recovered by tractor and trailer, predominantly using our primary slipway. Additionally, it utilises another station slipway for launching and is 'flown' from the south side of the lifeboat house down the west slipway onto the beach. The IRH is then recovered up the third station slipway to the east side of the station.

Safe continuation of operations and training

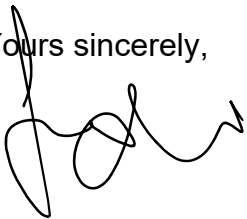
All slipways and the surrounding areas need to be clear of obstructions, this is vital for providing the lifesaving service from Hoylake lifeboat station. Any of the slipways, or combinations of, will be utilised by either craft at any time of the day and night. The vegetation, and as it spreads, will act as an obstacle for safe operations. Thus, managing this beach area is required for our continued safe and effective service of both the lifeboat and hovercraft from the station.

Over recent years, the Hoylake team have needed to adapt operations to ensure that our interactions with the encroaching grass are limited as far as is practicable. Training evolutions, which once may have occurred in areas where the grass is now prevalent, have ceased. This adaptation is partly to ensure that local sensitivities are not provoked by the crew seemingly operating on the grass for non-lifesaving purposes. Although not ideal, this is a necessary step. However, if the grass continues encroaching towards the slipways, the team would necessarily be operating on the grass during routine launch and recovery operations and unable to keep clear of it.

Although, to date, we have not observed significant degradation to crew safety and welfare issues, the team is aware of the potential for interactions with the intruding flora, especially when utilising the west and east slipways for launch and recovery activity. We are already experiencing an increasing grass encroachment here. The crew are intensely aware of the need to take precautions when operating in the areas of the grass to ensure any interaction with the craft is minimal and not likely to cause equipment damage or instabilities.

Hoylake lifeboat station is a vital asset to the community of, and visitors to, Wirral, Merseyside and North Wales and has been providing a lifesaving service for over 200 years; Annex 1 provides further background of Hoylake Lifeboat Station and Appendix 1 portrays statistics of all assets' rescue operations. This service remains as vital today as when it was first established; the crew selflessly answer the call to assist others and they should be assured of their safety when doing so. There has been a significant investment in the station, all funded from private donations and equipment at Hoylake and the crews have been provided with a modern, safe, and effecting lifesaving base. This is something which we would like to see maintained, and the assistance with the provision of debris-free, clear and level grounds around the station and slipways on which to safely access and egress the areas would be greatly appreciated.

Yours sincerely,

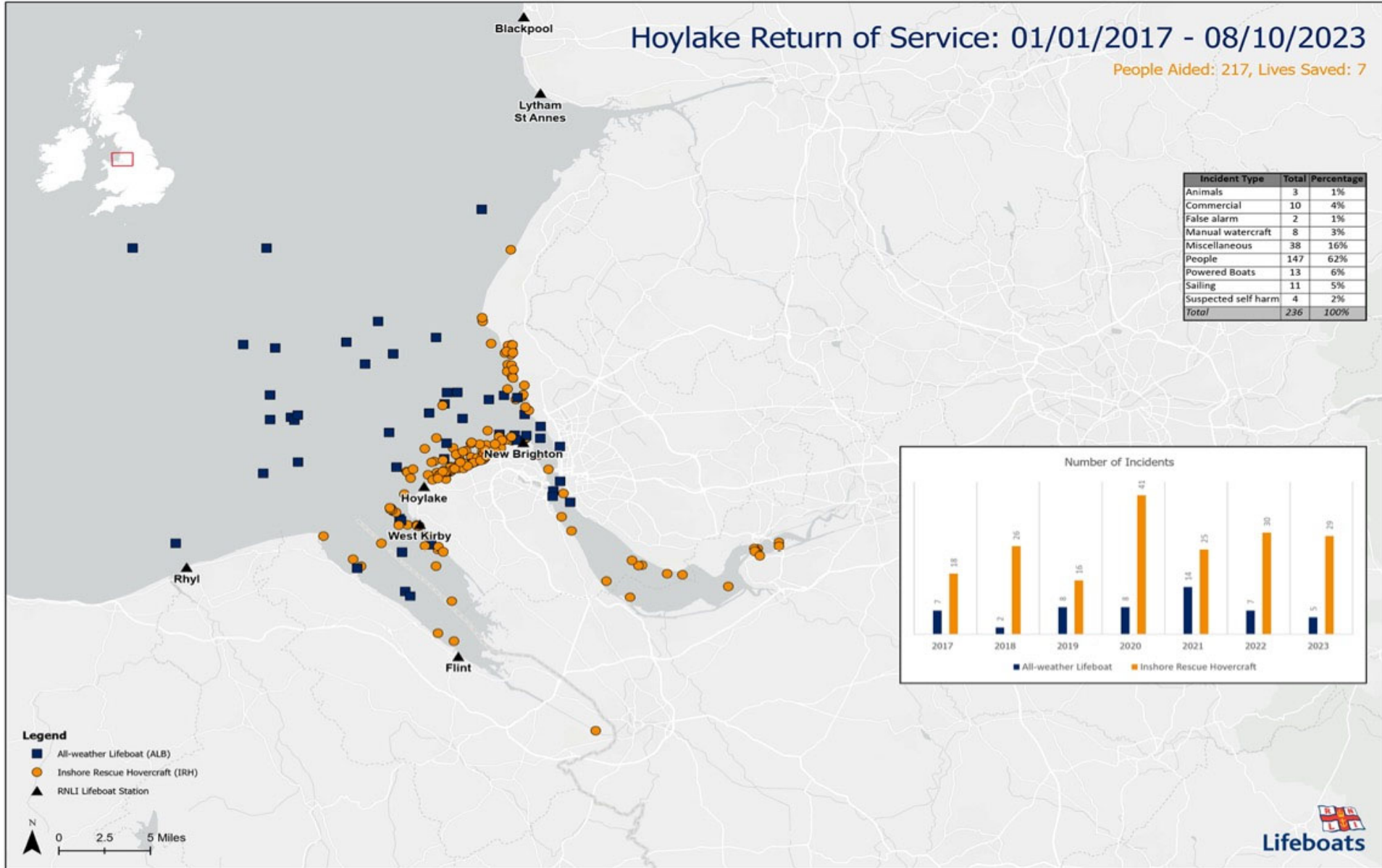


Jo Partner
Head of Region (Wales, West & Isle of Man)

RNLI Regional Base | Unit 9, Ffordd Richard Davies | St Asaph Business Park South |
ST ASAPH | Denbighshire | LL17 0LJ

Annex 1 – The background of Hoylake Lifeboat Station.
Appendix 1 – Hoylake LBS Rescue statistics (all assets).

Appendix 1 – Hoylake LBS Rescue statistics (all assets).



Esri UK, Esri, HERE, Garmin, Foursquare, FAO, METI/NASA, USGS

Hoylake Operational Stats: October 2023

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19 January 2024

Our ref: 457097



BY EMAIL ONLY

Operations Delivery
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

0300 060 3900

Dear Mr Gardiner,

Discretionary Advice Service (Charged Advice)

Operation proposal and location: North Wirral Foreshore SSSI (Hoylake Beach)

Thank you for your consultation on the above which was received on 12 December 2023.

This advice is provided as part of Natural England's Discretionary Advice Service HaskoningDHV UK Ltd. has asked Natural England to provide advice upon:

- A review of the draft HRA's for beach management options at Hoylake Beach with written feedback.
- Advice on potential impacts on the designated features and/or protected sites.

This advice is provided in accordance with the Quotation and Agreement dated 12 December 2023.

We understand the pressures you are under and want to work with you to get a good outcome for nature and people at Hoylake Beach. The following advice is based upon the information within:

1. Habitat Regulations Assessment Report: Hoylake Beach Management Plan – Access For All, Final/1, 08 December 2023.
2. Habitat Regulations Assessment Report: Hoylake Beach Management Plan – Amenity Beach, Draft/0.1, 08 December 2023.

1. Habitat Regulations Assessment Report: Hoylake Beach Management Plan – Access For All, Final/1, 08 December 2023.

These proposals affect or may affect The Dee Estuary Special Area of Conservation (SAC); Mersey Narrows and North Wirral Foreshore Special Protection Area (SPA) and Mersey Narrows and North Wirral

Foreshore Ramsar. These sites are hereafter referred to as 'European Sites'. These sites form part of the UK's national site network which is made up of habitats and species considered to be most in need of conservation at a European level.

On pages 1 and 6, Natural England is referred to as the competent authority. Natural England must remind you that in this instance that Wirral Borough Council are the competent authority and are therefore responsible for the Appropriate Assessment (AA) and conclusions within this HRA.

The current version of the HRA does not meet the sequential tests of Habitats Regulations (i.e., Assessment of likely significant effects (LSE), followed by an AA) and does not draw clear conclusions at each stage.

On page 28 all features for Mersey Narrows and North Wirral Foreshore SPA are listed, however on page 33, 'little gull, *Hydrocoloeus minutus*' is missed from the LSE table. All SPA features should be assessed within the LSE stage.

We note that disturbance to birds from 'above water noise' and 'visual disturbance' is ruled out at the likely significant effect stage. Natural England generally considers any potential disturbance impacts to SPA/Ramsar birds as a likely significant effect. Any mitigation to avoid disturbance such as, time of year, should be assessed fully within the AA stage.

Natural England notes that impacts to birds from habitat loss is not considered. Natural England suggests that habitat loss may impact potential roosting sites for the SPA/Ramsar bird species, and this should be considered further.

Hydrocarbon & polycyclic aromatic hydrocarbon (PAH) and toxic contamination is ruled out at the likely significant effect stage and mitigation measures are included at this stage. Any mitigation to avoid contamination impacts, should be assessed fully within the AA stage.

We note the HRA does not include an assessment of all the attributes. Some key SAC habitats and key distinctive features such as H2110 embryonic shifting dunes and H1210 Annual Vegetation of driftlines are missing. The HRA also fails to consider any impacts to the protected species, Shore Dock (*Rumex rupestris*) which can be considered part of the assemblage of the H2110 embryonic shifting dunes habitat. An assessment of impacts on key designated habitat features is required, together with any mitigation measures, to ensure the robustness of the HRA.

To assess the activity fully, Natural England suggests potential impact pathways and sources should be expanded. As the minimum, habitat loss should consider all relevant attributes included in the Common Standards Monitoring (CSM) guidelines for sand dunes, shingle, and saltmarsh, but ideally the attributes for the Annex 1 qualifying features should be listed and considered.

Along with physical loss of vegetation and component species there are potential issues which should be considered further. These include smothering of adjacent vegetation when the vegetation is removed; loss of sediment from the system when clumps of vegetation are removed; and physical damage to the sediment structure (sediment stress) through the use of vehicles when undertaking vegetation clearance. Impacts to saltmarsh sediments associated with this include: soils having a higher bulk density, soils having a reduced oxygen availability due to a reduced pore size/connectivity, increased waterlogging, increase in bare ground. The loss of sediment / compaction could also cause a change in the local topography, increasing tidal inundation, and increased pooling affecting the adjacent vegetation, consequentially causing a shift in the species composition. In addition, the assessment should consider the future extent and direction of vegetation succession which could develop if the proposed work was not undertaken.

As Natural England disagrees with the conclusions from the Likely Significant Effect (LSE) stage, we therefore suggest the in-combination assessment is re-considered once our concerns from the LSE are addressed.

Page 35 states, 'The Hoylake BMP is considered to have a beneficial effect on recreational pressure at Hoylake Beach.' This statement should be clarified further and explain how the Hoylake BMP is considered to have a beneficial effect. If the plan is likely to increase recreational pressure, adequate mitigation should be implemented to avoid potential impacts.

Natural England acknowledges the maintenance of the boating lake is mentioned within the document. Natural England suggests impacts from this maintenance should be considered further within the HRA. Redistributing sand along the foreshore has the potential to smother existing vegetation and this should be assessed fully.

SSSI

Natural England may be able to support this option, with modification and additional mitigation measures. Here are some examples of mitigation which could be included:

- Ensuring as much sediment as possible is shaken off from vegetation removed from the system to retain sediment.
- Use of best practice methods when using vehicles on a saltmarsh e.g. using appropriate vehicles for the terrain or removing vehicles from site when not in use.
- Ensure careful route management to reduce potential for compaction.
- Translocation of any protected plant species.
- Code of conduct should include information on what is happening at the beach in terms of vegetation development and why the beach profile is changing. Public engagement signs are recommended to explain the importance of the vegetation and it is an offence to remove vegetation without the correct permissions.
- Explore opportunities to promote good practice along the frontage for management of recreational disturbance.

Natural England have concerns regarding the 10 meter buffer strip, removal of vegetation at the sea wall and removal of dense vegetation. Natural England would want to be confident that the width of the buffer is necessary for RNLI operations on the beach and so would need to see further evidence to justify this scale of clearance. Suitable evidence would include:

- the size of the vessels (width, length and clearance under the vessels).
- A clear map showing the slipways (primary, secondary, third and fourth) and how they are used, how often and labelling various location.

Natural England also has concerns regarding the clearance of slipways and the infilling of pools adjacent to the slipways which host significant stands of Northern/Sea Water Whorl Grass (*Catabrosa aquatica minor*).

2. Habitat Regulations Assessment Report: Hoylake Beach Management Plan – Amenity Beach, Draft/0.1, 08 December 2023.

These proposals affect or may affect The Dee Estuary Special Area of Conservation (SAC); Mersey Narrows and North Wirral Foreshore Special Protection Area (SPA) and Mersey Narrows and North Wirral Foreshore Ramsar. These sites are hereafter referred to as 'European Sites'. These sites form part of the UK's national site network which is made up of habitats and species considered to be most in need of conservation at a European level.

On pages 1 and 6, Natural England is referred to as the competent authority. Natural England must remind you that in this instance, Wirral Borough Council are the competent authority and are therefore responsible for the AA and conclusions within this HRA.

The current version of the HRA does not meet the sequential tests of Habitats Regulations (i.e., Assessment of likely significant effects (LSE), followed by an AA) and does not draw clear conclusions at each stage.

On page 28 all features for Mersey Narrows and North Wirral Foreshore SPA are listed, however on page 33, 'little gull, *Hydrocoloeus minutus*' is missed from the LSE table. All SPA features should be assessed within the LSE stage.

We note that disturbance to birds from 'above water noise' and 'visual disturbance' is ruled out at the likely significant effect stage. Natural England generally considers any potential disturbance impacts to

SPA/Ramsar birds as a likely significant effect. Any mitigation to avoid disturbance such as, time of year, should be assessed fully within the AA stage.

Natural England notes that impacts to birds from habitat loss is not considered. Natural England suggests that habitat loss may impact potential roosting sites for the SPA/Ramsar bird species, and this should be considered further.

Hydrocarbon & polycyclic aromatic hydrocarbon (PAH) and toxic contamination is ruled out at the likely significant effect stage and mitigation measures are included at this stage. Any mitigation to avoid contamination impacts, should be assessed fully within the AA stage.

We note the HRA does not include an assessment of all the attributes. Some key SAC habitats and key distinctive features such as H2110 embryonic shifting dunes and H1210 Annual Vegetation of driftlines are missing. The HRA also fails to consider any impacts to the protected species, Shore Dock (*Rumex rupestris*) which can be considered part of the assemblage of the H2110 embryonic shifting dunes habitat. An assessment of impacts on key designated habitat features is required, together with any mitigation measures, to ensure the robustness of the HRA.

To assess the activity fully, Natural England suggests potential impact pathways and sources should be expanded. As the minimum, habitat loss should consider all relevant attributes included in the Common Standards Monitoring (CSM) guidelines, but ideally the attributes for the Annex 1 qualifying features should be listed and considered.

Along with physical loss of vegetation and component species there are potential issues which should be considered further. These include smothering of adjacent vegetation when the vegetation is removed; loss of sediment from the system – when clumps of vegetation are removed; physical damage to the sediment structure through the use of vehicles. The loss of sediment / compaction could also cause a change in topography, increasing tidal inundation and increased pooling affecting the adjacent vegetation.

As Natural England disagrees with the conclusions from the LSE stage, we therefore suggest the in-combination assessment is re-considered once our concerns from the LSE are addressed.

Page 35 states, 'The Hoylake BMP is considered to have a beneficial effect on recreational pressure at Hoylake Beach.' This statement should be clarified further and explain how the Hoylake BMP is considered to have a beneficial effect. If the plan is likely to increase recreational pressure, adequate mitigation should be implemented to avoid potential impacts.

Natural England acknowledges the maintenance of the boating lake is mentioned within the document. Natural England suggests impacts from this maintenance should be considered further within the HRA. Redistributing sand along the foreshore has the potential to smother existing vegetation and this should be assessed fully.

SSSI

It is unlikely that Natural England could support the extent of vegetation loss outlined in this option and it would need considerable refinement.

Protected species

The advice on this proposal, and the guidance contained within Natural England's standing advice relates to this case only and does not represent confirmation that a species licence (should one be sought) will be issued. Please see **Annex 1** for information regarding licensing for the following Protected Species:

- Shore Dock (*Rumex rupestris*)

This proposal, as presented, has the potential to affect species protected under European or UK legislation.

Other advice

As this is a rapidly changing site, our advice may change as new evidence emerges and habitats develop further.

A marine license may be required for this activity. Please contact the Marine Management Organisation (MMO) for further advice surrounding this.

We have scheduled a meeting for 1st February to discuss our advice further and to answer any questions. We look forward to meeting with you. In the meantime, if we can do anything else to help, please contact Cheshire2.Lancashire@defra.gov.uk.

This letter concludes Natural England's Advice within the Quotation and Agreement dated 12 December 2023.

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

Yours

Hannah Turner
Team Leader
Cheshire to Lancashire Area Team
Cc commercialservices@naturalengland.org.uk

Annex 1

Protected Species

A licence is required in order to carry out any works that involve certain activities such as capturing the animals, disturbance, or damaging or destroying their resting or breeding places. Note that damage or destruction of a breeding site or resting place is an absolute offence and unless the offences can be avoided (e.g. by timing the works appropriately), it should be licensed. In the first instance it is for the public body/statutory undertaker to decide whether a species licence will be needed. The developer may need to engage specialist advice in making this decision. A licence may be needed to carry out mitigation work as well as for impacts directly connected with a development. Further information can be found in Natural England's '[How to get a licence](#)' publication.

As the application requires your organisation's permission, it is for your organisation to consider whether the permission would offend against Article 12(1) of the Habitats Directive, and if so, whether the application would be likely to receive a licence. This should be based on the advice Natural England provides at formal consultation on the likely impacts on favourable conservation status and Natural England's [guidance](#) on how the three tests (no alternative solutions, imperative reasons of overriding public interest and maintenance of favourable conservation status) are applied when considering licence applications.

Natural England's Pre-submission Screening Service can screen application drafts prior to formal submission, whether or not the relevant permission is already in place. Screening will help applicants by making an assessment of whether the draft application is likely to meet licensing requirements, and, if necessary, provide specific guidance on how to address any shortfalls. The advice should help operators and ecological consultants to better manage the risks or costs they may face in having to wait until the formal submission stage after permission is secured, or in responding to requests for further information following an initial formal application.

The service will be available for new applications, resubmissions or modifications – depending on customer requirements. More information can be found on the [GOV.UK website](#).

01 March 2024

Our ref: 457097



BY EMAIL ONLY

Operations Delivery
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

0300 060 3900

Dear Mr Gardiner,

Discretionary Advice Service (Charged Advice)

Operation proposal and location: North Wirral Foreshore SSSI (Hoylake Beach)

Thank you for your consultation on the above which was received on 20 February 2024.

This advice is provided as part of Natural England's Discretionary Advice Service. HaskoningDHV UK Ltd. has asked Natural England to provide advice upon:

- A review of the revised draft HRA's for beach management options at Hoylake Beach with written feedback.
- Advice on potential impacts on the designated features and/or protected sites.

This advice is provided in accordance with the Quotation and Agreement dated 12 December 2023.

Many thanks for providing Natural England with two revised HRA's for beach management options at Hoylake Beach. Natural England were really pleased to see you have taken our advice on board although we favour the most natural approach to beach management possible, we would like to continue working with you to get a good outcome for nature and people at Hoylake Beach. As we have previously said, we cannot support the original two options, but these revised versions are moving in the right direction. The following advice is based upon the information within:

1. Habitat Regulations Assessment Report: Hoylake Beach Management Plan – Access For All, Final/2, 16 February 2024.
2. Habitat Regulations Assessment Report: Hoylake Beach Management Plan – Amenity Beach, Final/2, 16 February 2024.

- 1. Habitat Regulations Assessment Report: Hoylake Beach Management Plan – Access For All,**

These proposals affect or may affect The Dee Estuary Special Area of Conservation (SAC); Mersey Narrows and North Wirral Foreshore Special Protection Area (SPA) and Mersey Narrows and North Wirral Foreshore Ramsar. These sites are hereafter referred to as 'European Sites'.

Natural England have reviewed the Habitat Regulations Assessment (HRA) for Hoylake Beach Management Plan – Access for All undertaken by Royal HaskoningDHV, dated 16 February 2024, on behalf of Wirral Borough Council. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusion. Natural England have provided comments within this letter.

On page 22 (Table 3-1), it states that 0.38ha of seawall vegetation is to be lost and following that within the Appropriate Assessment Stage the HRA states, 'To protect this habitat, the proposed strip, from the RNLI station to King's Gap, will be located approximately 5m from the seawall, providing a buffer'. If the buffer is intended as mitigation to avoid an adverse effect on habitats from the seawall vegetation being lost (and potentially Shore Dock (*Rumex rupestris*), this needs to be made clearer. For example, confirming that as a result of the 5m buffer along the sea wall no vegetation will be lost from this zone.

On page 23, Natural England suggests that the vegetation removal cover % should be separated by saltmarsh vegetation density type. This will help inform how much dense vegetation is to be removed compared to sparse vegetation type.

On page 32, the following Annex II species are listed: S1095. *Petromyzon marinus*; Sea lamprey S1099. *Lampetra fluviatilis*; River lamprey S1395. *Petalophyllum ralfsii*, Petalwort. These should be considered in the Likely Significant Effect (LSE) stage for completeness.

In Section, 5.3.1.3 Habitat Loss and Damage Embryonic shifting dunes, this section should include the amount of vegetation to be lost.

Within the LSE table where physical loss is assessed, the amount of embryonic shifting dune loss should be specified.

Within Section 5.4 LSE - In-combination Assessment, Natural England were pleased to see the inclusion of West Kirby Beach Management Options and Beach Management Operations Wirral Beaches, however the in-combination assessment failed to include the removal of saltmarsh vegetation, both directly (West Kirby) and through incidental vegetation loss (Wirral Beaches). This should be considered within the in-combination assessment.

On page 43 the HRA states, 'Should any protected plant species be identified, an appropriate translocation plan will be developed and implemented prior to any habitat being removed'. Whilst Natural England are pleased to see mitigation here, the term protected plant species is ambiguous and we suggest the targeted protected plant species are named here.

Within Section 6.1.3 Damage to adjacent habitats and sediment structure, smothering of habitats and loss of sediment affecting the Dee Estuary SAC and Mersey Narrows and North Wirral Foreshore Ramsar site, Natural England was pleased to see mitigation to avoid damage to adjacent habitats. Considering the sensitivities on the site, Natural England suggests an ecological clerk of works oversees the work on site who should have skills in plant ID, ornithology (to monitor potential impacts on birds) and to be able to liaise with contractors or members of the public. This section also outlines that the best practice for vehicle operations will be followed. Our view is that a commitment to a vehicle management plan would be preferred with defined routes to be used for maintenance works (this could include the access route to be used for the RNLI in case of staff changes). **Page 66**

Natural England were pleased to see monitoring included in the HRA. Natural England would be willing to support any future monitoring and our coastal specialists would be willing to input to ensure suitable data is collected moving forward.

Natural England was disappointed that Shore Dock was not considered throughout the HRA. Natural England has confirmed the presence of this species when a site visit was undertaken by our vascular plant senior specialist in 2022 at Hoylake Beach and should be considered within any future assessment.

For both options, there are questions around the future extent of H2110 embryonic shifting dunes habitat, as it is in effect constrained by the promenade and the proposed vegetation removal. The Supplementary Advice for the Conservation Objectives (SACO) for H2110 habitat has several attributes around function and coastal processes including:

Attribute	Target
Future extent of habitat within the site and ability to respond to seasonal changes	Maintain/ Restore the ability to absorb seasonal and periodic fluctuations in the extent of the habitat.
Structure and function: dune topography	Maintain/ Restore a natural dune topography, and allow natural change that is wind driven (some change may be necessary to maintain the continuity of slacks).
Supporting processes: adaptation and resilience (habitat)	Maintain/ Restore the feature's ability, and that of its supporting processes, to adapt or evolve to wider environmental change, either within or external to the site.
Supporting processes: functional connectivity with wider coastal sedimentary system	Maintain/ Restore adequate movement of sediment from all key sediment sources (directly from the beach, indirectly from offshore, eroding cliffs, etc).

The management options will prevent the development of this habitat type and this needs to be considered further. It may be worth considering where embryo dunes could be created or allowed to develop unhindered transitioning naturally to saltmarsh vegetation for example to the north of the RNL station. This area could be specified in the Beach Code of Conduct as an unmanaged area where access is limited.

SAC, SPA & Ramsar

Natural England is satisfied that, subject to the consideration of Natural England's recommendations above by your Authority and the operations being undertaken in strict accordance with the submitted proposals, these proposals will avoid adverse effects upon the interest features for which the European sites are notified. Natural England favours the access for all option.

SSSI

These options have not been assessed at the SSSI level and this advice does not constitute Natural England's assent. Although Natural England's discretionary advice does not pre-determine the outcome of any SSSI assessment we do have reservations about the potential impacts to the features of the SSSI.

These proposals affect or may affect The Dee Estuary Special Area of Conservation (SAC); Mersey Narrows and North Wirral Foreshore Special Protection Area (SPA) and Mersey Narrows and North Wirral Foreshore Ramsar. These sites are hereafter referred to as 'European Sites'.

Natural England have reviewed the Habitat Regulations Assessment (HRA) for Hoylake Beach Management Plan – Amenity Beach undertaken by Royal HaskoningDHV, dated 16 February 2024, on behalf of Wirral Borough Council. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusion. Natural England have provided comments within this letter.

On page 22, it states that 0.44ha of seawall vegetation and 0.01 ha of embryonic shifting dune habitat is to be lost and then within the Appropriate Assessment, the HRA states, 'To protect this habitat, the proposed strip, from the RNL station to King's Gap, will be located approximately 5m from the seawall, providing a buffer'. If the buffer is intended as mitigation to avoid an adverse effect on the habitats (the seawall vegetation and embryonic shifting dune habitat (and potentially Shore Dock (*Rumex rupestris*)) being lost, this needs to be made clearer.

On page 23, Natural England suggests that the vegetation removal cover % should be separated by saltmarsh vegetation density type. This will help inform how much dense vegetation is to be removed compared to sparse vegetation type.

On page 32, the following Annex II species are listed: S1095. *Petromyzon marinus*; Sea lamprey S1099. *Lampetra fluviatilis*; River lamprey S1395. *Petalophyllum ralfsii*, Petalwort. These should be considered in the Likely Significant Effect (LSE) stage for completeness.

In Section, 5.3.1.1 Noise and visual disturbance, it states, 'The proposed beach management activities are localised, taking place between the RNL station and King's Gap'. This appears to be related to the access for all option rather than the amenity beach option and this should be rectified.

In Section, 5.3.1.3 Habitat Loss and Damage Embryonic shifting dunes, this section should include the amount of vegetation to be lost.

Within Section 5.3.1.5 Recreational Activities, it states that 'Any increase in visitor numbers to Hoylake Beach as a result of the BMP is expected to be minimal.' Natural England understands that this option is for amenity benefits, and this will likely result in increased beach visitor numbers. This also applies to Section 5.3.1.6 Environmental Enhancements and Benefits, therefore it needs to be clarified how the vegetation removal strip and Code of Conduct will reduce trampling, disturbance, dog fouling on the beach and reduce disturbance to wildlife. This also applies to Section 6.1.6 Changes in recreation pressure affecting the Dee Estuary SAC, and the Mersey Narrows and North Wirral Foreshore SPA and Ramsar site.

Within the LSE table where physical loss is assessed, the amount of embryonic shifting dune loss should be specified. For the smothering assessment, increased recreational disturbance impacts should be considered here.

Within Section 5.4 LSE - In-combination Assessment, Natural England were pleased to see the inclusion of West Kirby Beach Management Options and Beach Management Operations Wirral Beaches, however the in-combination assessment failed to include the removal of saltmarsh vegetation, both directly (West Kirby) and through incidental vegetation loss (Wirral Beaches). This should be considered within the in-combination assessment.

It is stated on page 41, 'The inclusion of a 5m buffer from the seawall, pushes the strip slightly further into the Atlantic salt meadow habitat resulting in the loss of 1.54ha of Atlantic salt meadows habitat, which

equates to 0.09% of the combined area of Atlantic salt meadows recorded in the Dee Estuary SAC and the Hoylake beach management area'. Please revise these figures as they appear to relate to the access for all option.

On page 43 the HRA states, 'Should any protected plant species be identified, an appropriate translocation plan will be developed and implemented prior to any habitat being removed'. Whilst Natural England are pleased to see mitigation here, the term protected plant species is ambiguous and we suggest the targeted protected plant species are named here.

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unhindered transitioning naturally to saltmarsh vegetation for example to the north of the RNLI station. This area could be specified in the Beach Code of Conduct as an unmanaged area where access is limited.

SAC, SPA & Ramsar

Natural England is satisfied that, subject to the consideration of Natural England's recommendations above by your Authority and the operations being undertaken in strict accordance with the submitted proposals, these proposals will avoid adverse effects upon the interest features for which the European sites are notified.

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Protected species

The advice on this proposal, and the guidance contained within Natural England's standing advice relates to this case only and does not represent confirmation that a species licence (should one be sought) will be issued. Please see **Annex 1** for information regarding licensing for the following Protected Species:

- Shore Dock (*Rumex rupestris*)

This proposal, as presented, has the potential to affect species protected under European or UK legislation.

Other advice

A marine license may be required for this activity. Please contact the Marine Management Organisation (MMO) for further advice surrounding this.

For clarification of any points in this letter, please contact Cheshire2.Lancashire@defra.gov.uk.

This letter concludes Natural England's Advice within the Quotation and Agreement dated 12 December 2023.

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Yours

Amy Corthine
Coastal Senior Adviser
Cheshire to Lancashire Area Team
Cc commercialservices@naturalengland.org.uk

Annex 1

Protected Species

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Environment, Climate Emergency and Transport Committee – Terms of Reference

The Environment, Climate Emergency and Transport Committee has responsibility for parks and open spaces, highways management and infrastructure, coastal protection and flood defence and environment and waste matters. It is the Committee that leads on behalf of the Council in responding to and matters concerning the Climate Emergency. The Committee is also responsible for the overview and scrutiny of flood risk management and coastal erosion management functions.

The Committee is charged by full Council to undertake responsibility for the Council's role and functions:-

- (a) in co-ordinating the response to cross-cutting sustainability issues such as reducing carbon emissions, air quality issues, climate change response, improving resource efficiency and developing sustainable energy;
- (b) in relation to all highways matters and as highway authority, street authority, bridge authority, including but not limited to public open spaces, street furniture on the highway and open spaces or parts of open spaces immediately adjacent to the highway;
- (c) in relation to traffic management and transport and as traffic authority, including but not limited to public passenger transport and the co-ordination of transport for service users, traffic orders and rights of way issues;
- (d) in relation to parking, including on and off-street parking and civil parking enforcement;
- (e) in respect of parks, open spaces, countryside management, allotments, playgrounds and cemeteries, including arboricultural, gardening and warden services;
- (f) in relation to the management of authorised and unauthorised sites and encampments, this to include all activities necessary or incidental to the Council's performance of its responsibilities in relation to Gypsies, Roma and Travellers;
- (g) in relation to waste and as waste collection authority, litter authority, including but not limited to dealing with litter, street cleansing, abandoned vehicles and dog fouling, and the Council's relationship with Merseyside Recycling & Waste Authority (MRWA) as the joint waste disposal authority;
- (h) as coast protection authority and lead local flood authority;
- (i) in respect of emergency planning and community resilience (infrastructure and contract services);
- (j) providing a view of performance, budget monitoring and risk management in relation to the Committee's functions; and
- (k) undertaking the development and implementation of policy in relation to the Committee's functions, incorporating the assessment of outcomes, review of effectiveness and formulation of recommendations to the Council, partners and other bodies, which shall include any decision relating to the above functions.
- (l) in respect of Section 9JB of the Local Government Act 2000, the functions to review and scrutinise the exercise by risk management authorities of flood risk management and of coastal erosion management functions which may affect the local authority's area.

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