



Have your say

Hoylake Beach Management Plan – Phase 2 Consultation Report

Hoylake Beach

Consultation: 19 February – 25 March 2024

Report: 2 April 2024

Contents

1.0 Executive Summary	3
1.1 Key Findings.....	4
2.0 Methodology.....	5
2.1 Questionnaire	5
2.1.1 Analysis of Respondents	5
2.1.2 Interpretation of Results	6
2.2 In Person Information Sessions	6
2.3 Key Stakeholders	6
2.4 Communication	7
3.0 Results.....	8
3.1 The Questionnaire	8
3.1.1 Beach Option Question	8
3.1.2 Free Text Comments	11
3.2 Direct Representations	16
4.0 Demographics and Site Traffic.....	17
4.1 Demographics.....	17
4.2 Have Your Say - Site Traffic	21
Appendix 1: Direct Representations.....	22

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.

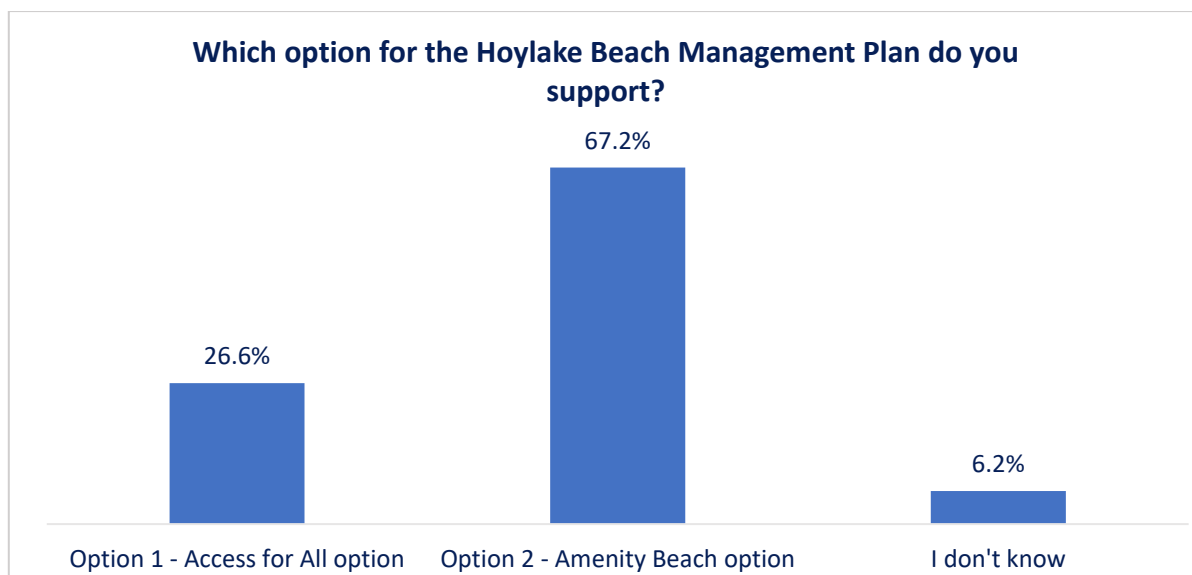


Figure 1: Which option for the Hoylake Beach Management Plan do you support?

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%).

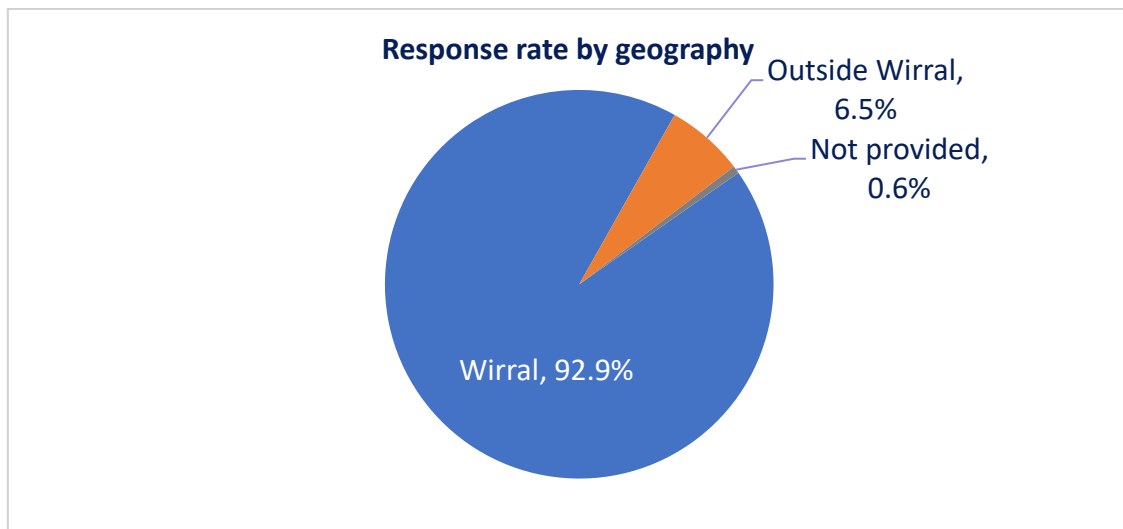


Figure 2: Response rate by geography.

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.

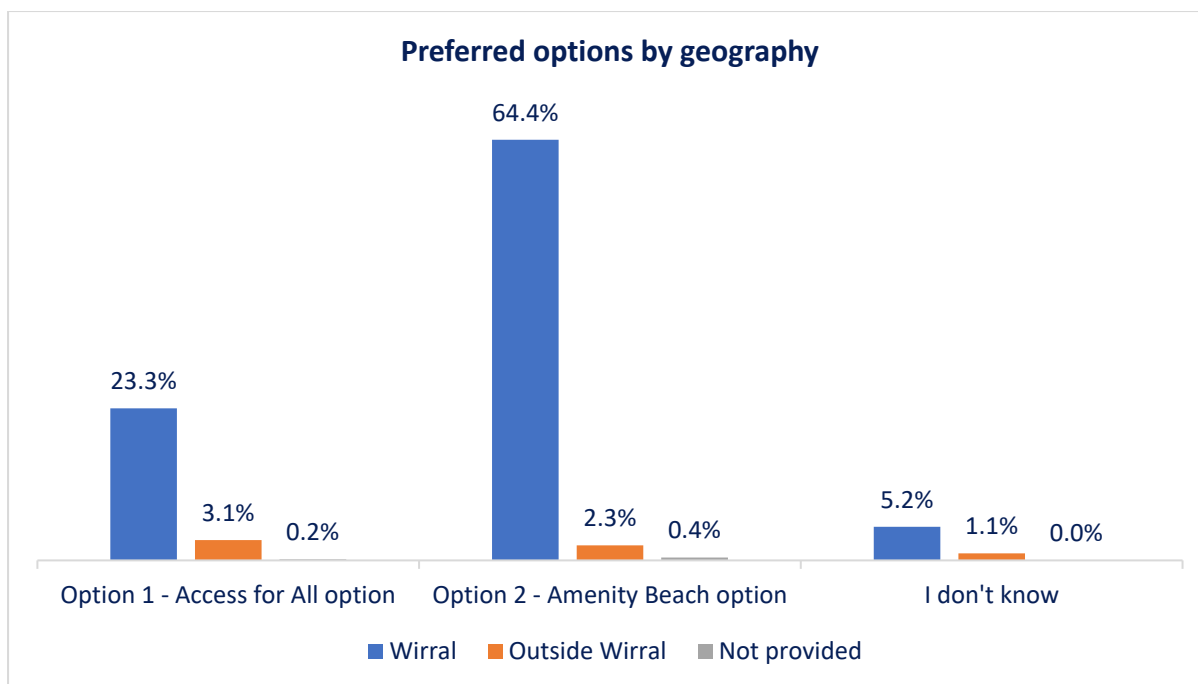


Figure 3: Preferred options by geography.

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%).

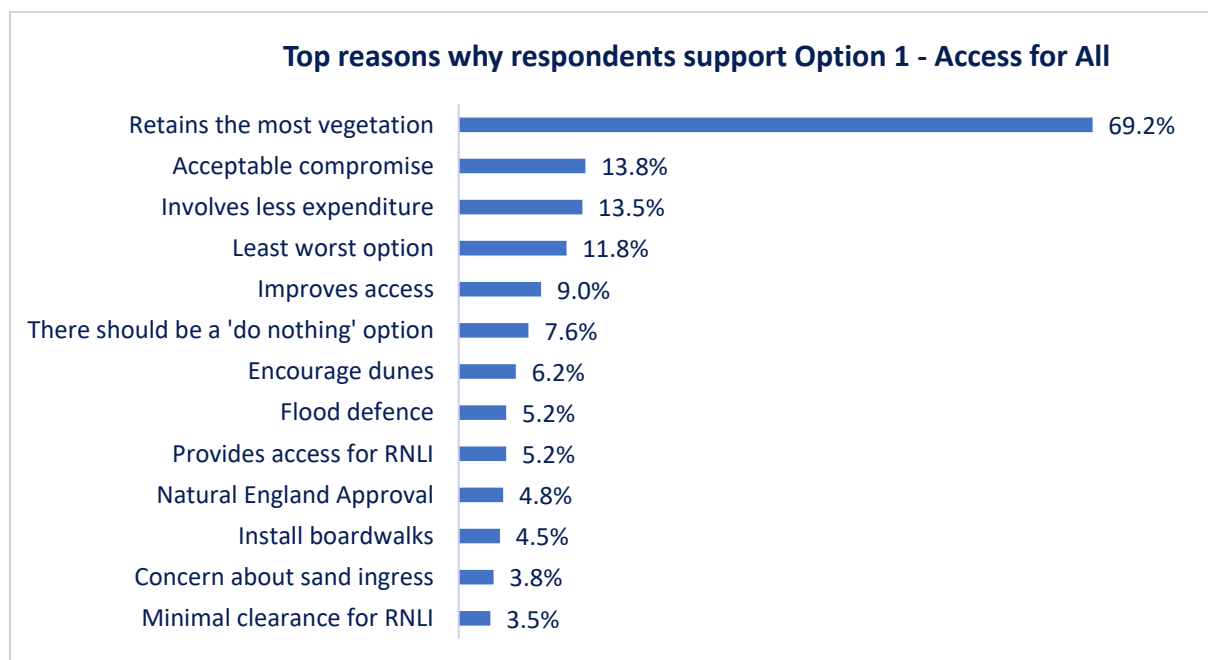


Figure 4: Top reasons why respondents support Option 1 - Access for All.

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%).

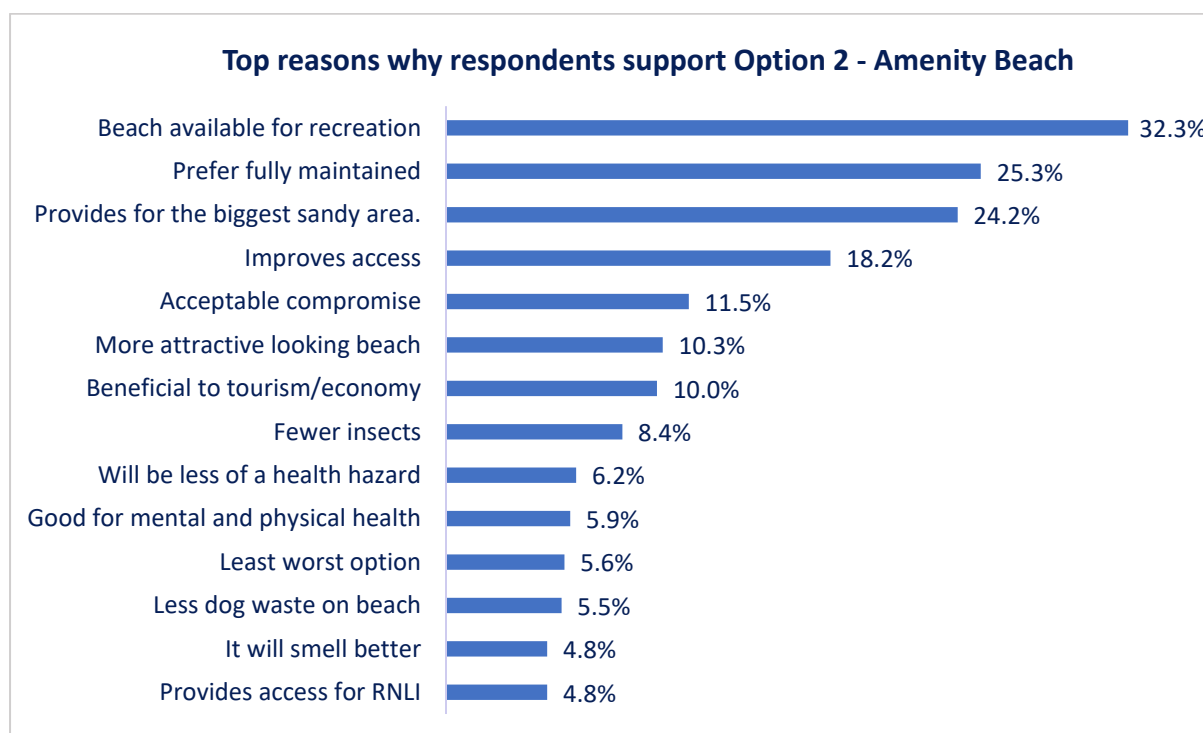


Figure 5: Top reasons why respondents support Option 2 - Amenity Beach

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%).

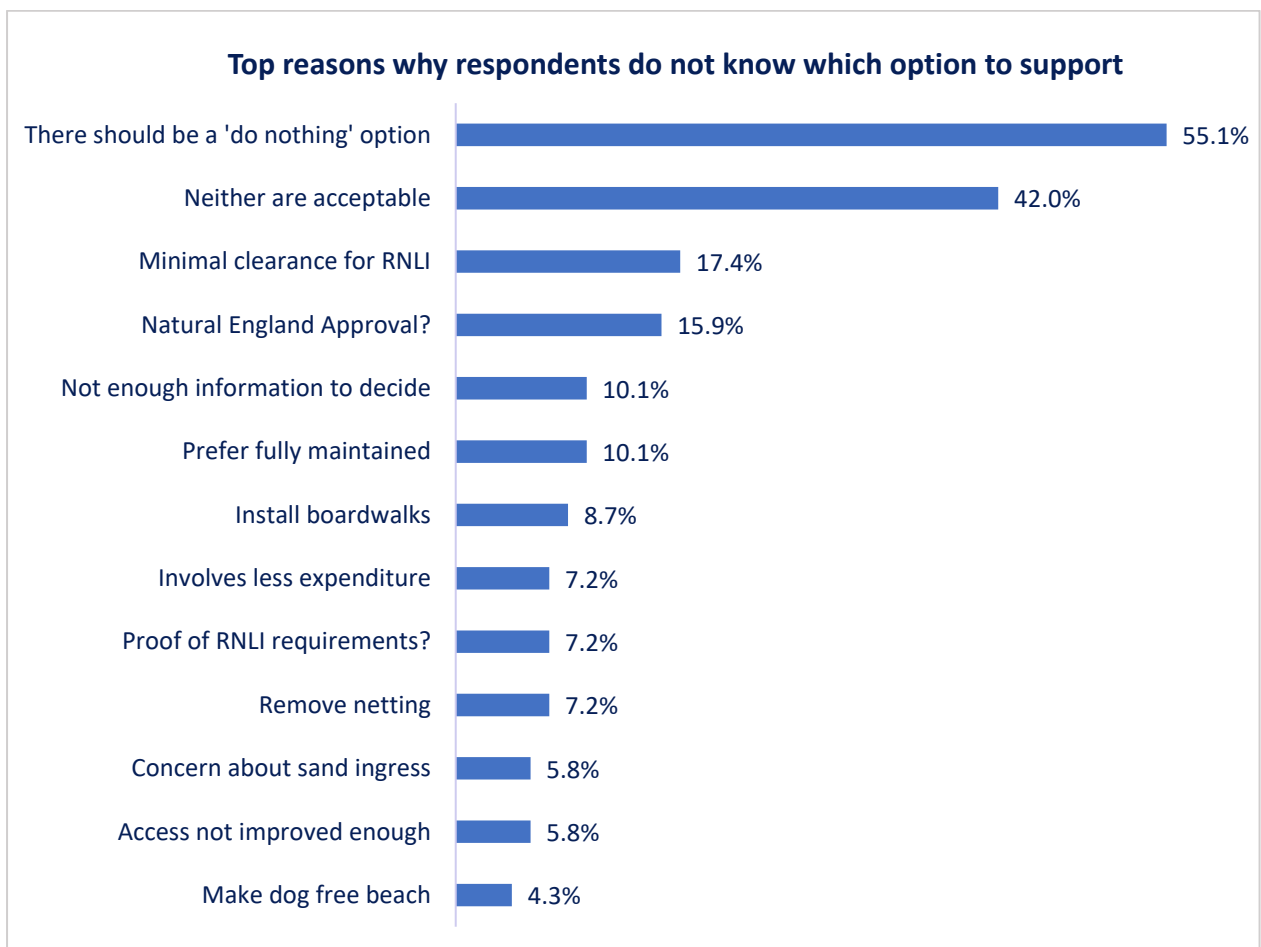


Figure 6: Top reasons why respondents do not know which option to support

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.

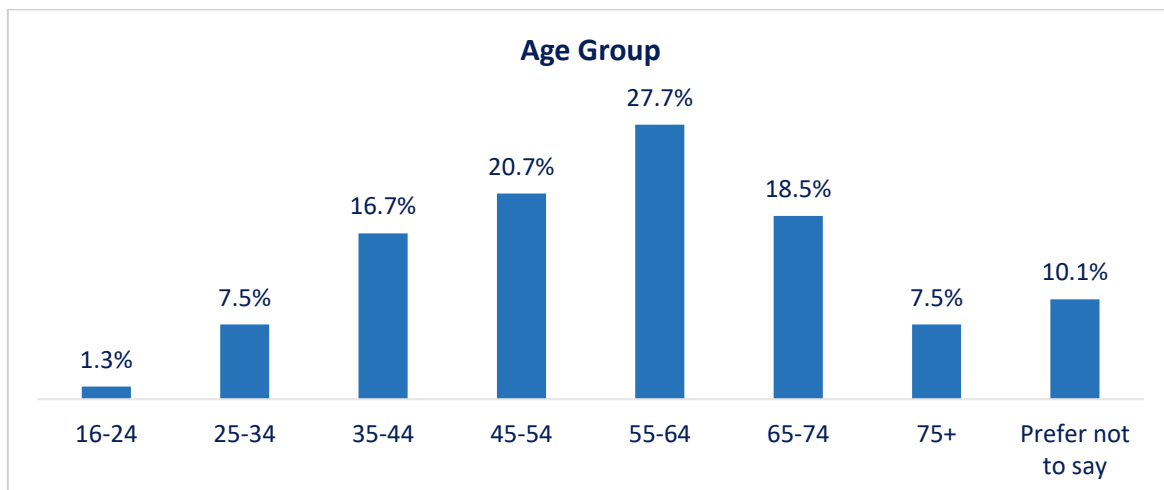


Figure 8: Chart displaying age groups

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.

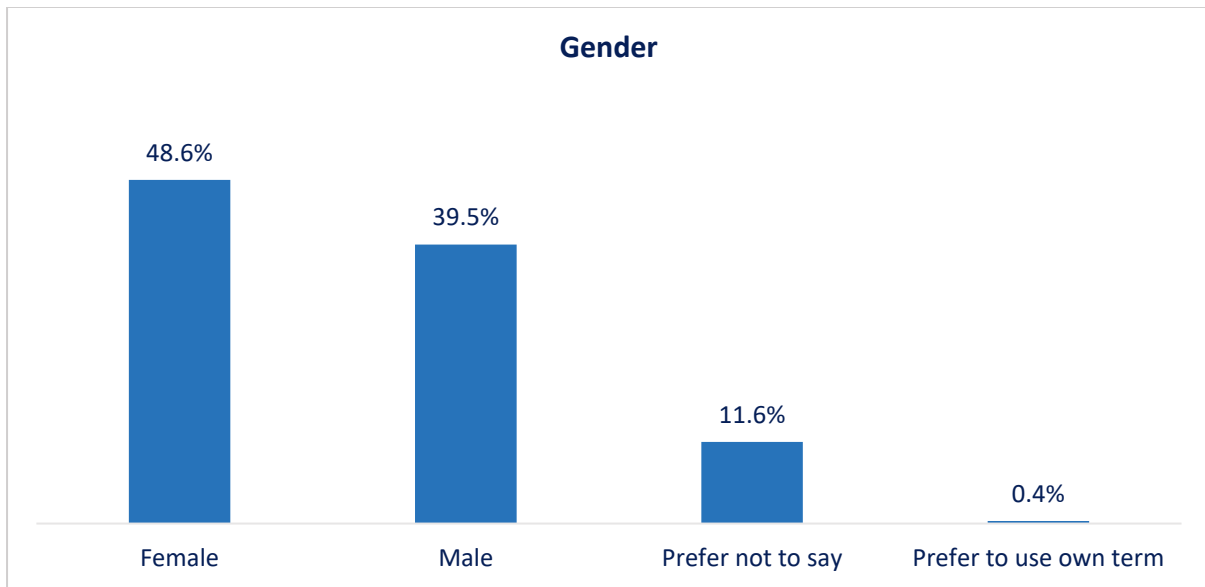


Figure 9: Chart displaying gender

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

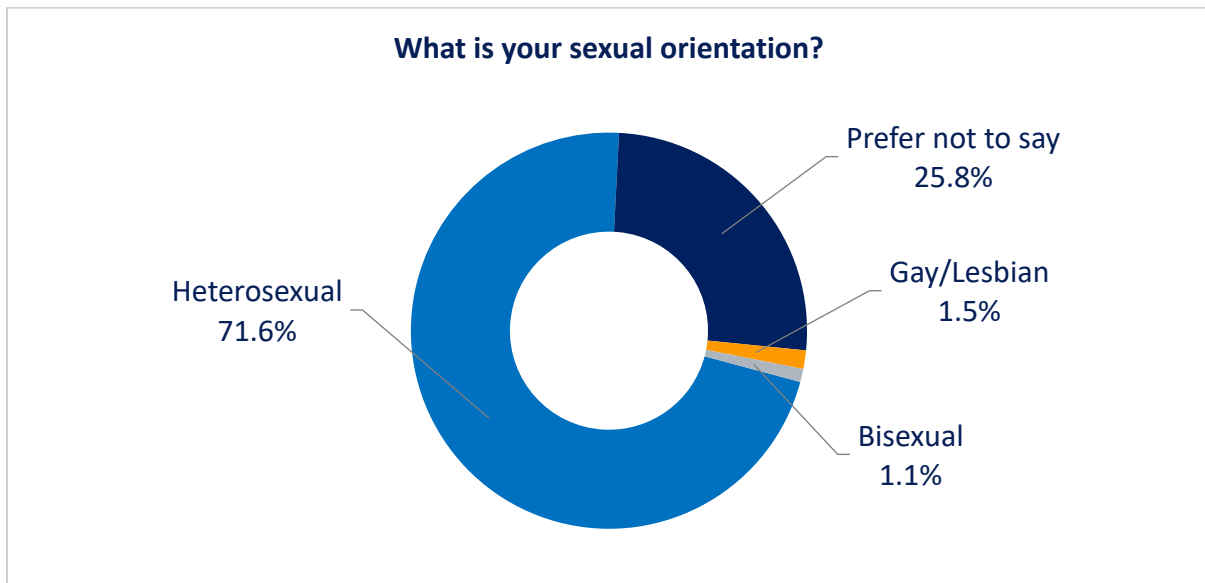


Figure 10: Chart displaying sexual orientation

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.

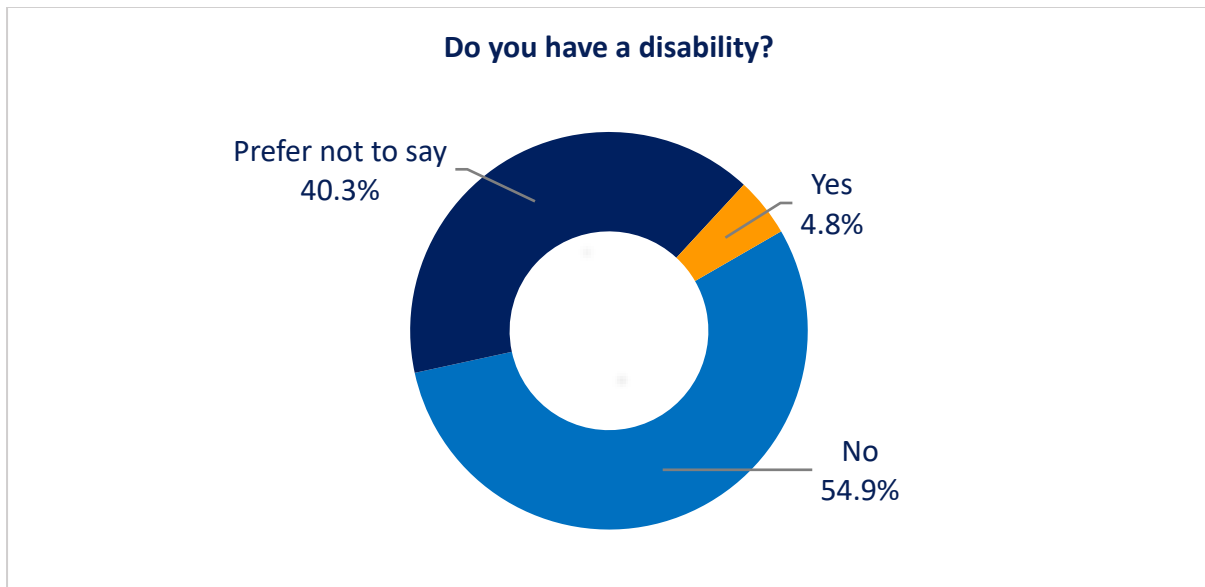


Figure 11: Chart displaying disability

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

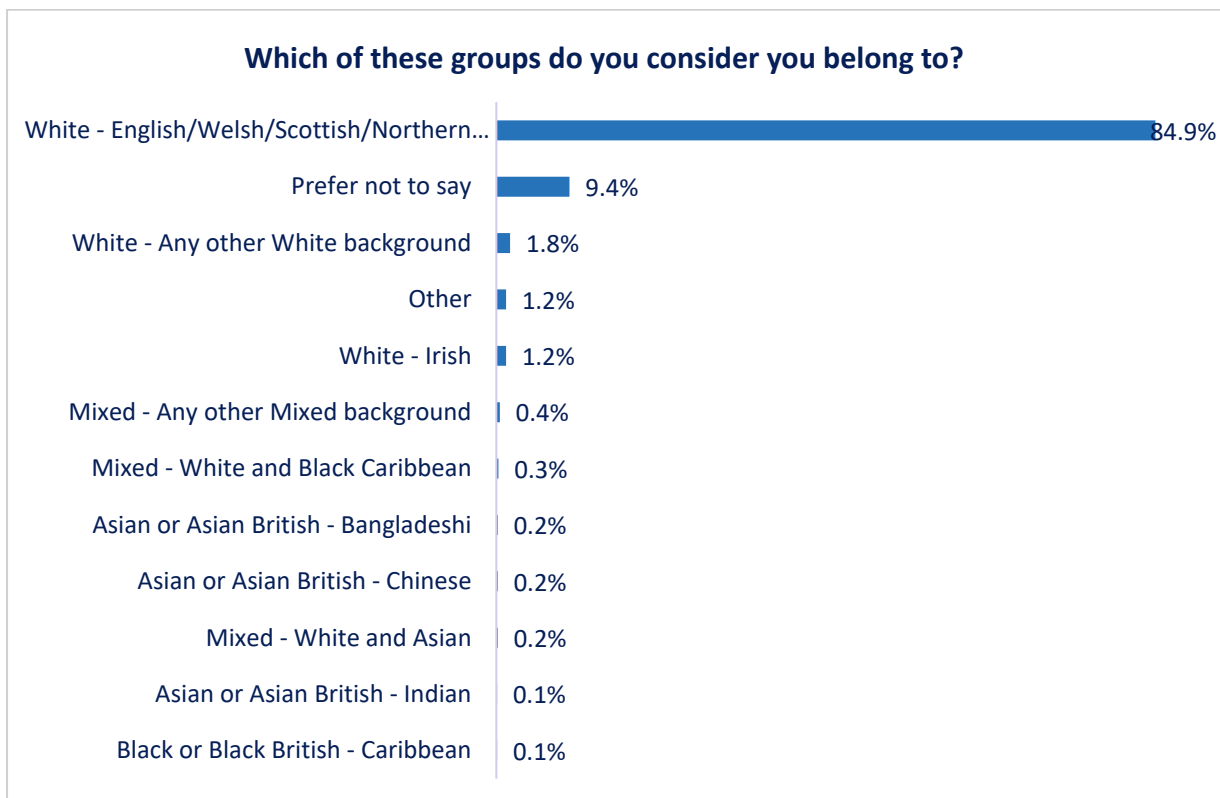


Figure 12: Chart displaying groups

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.

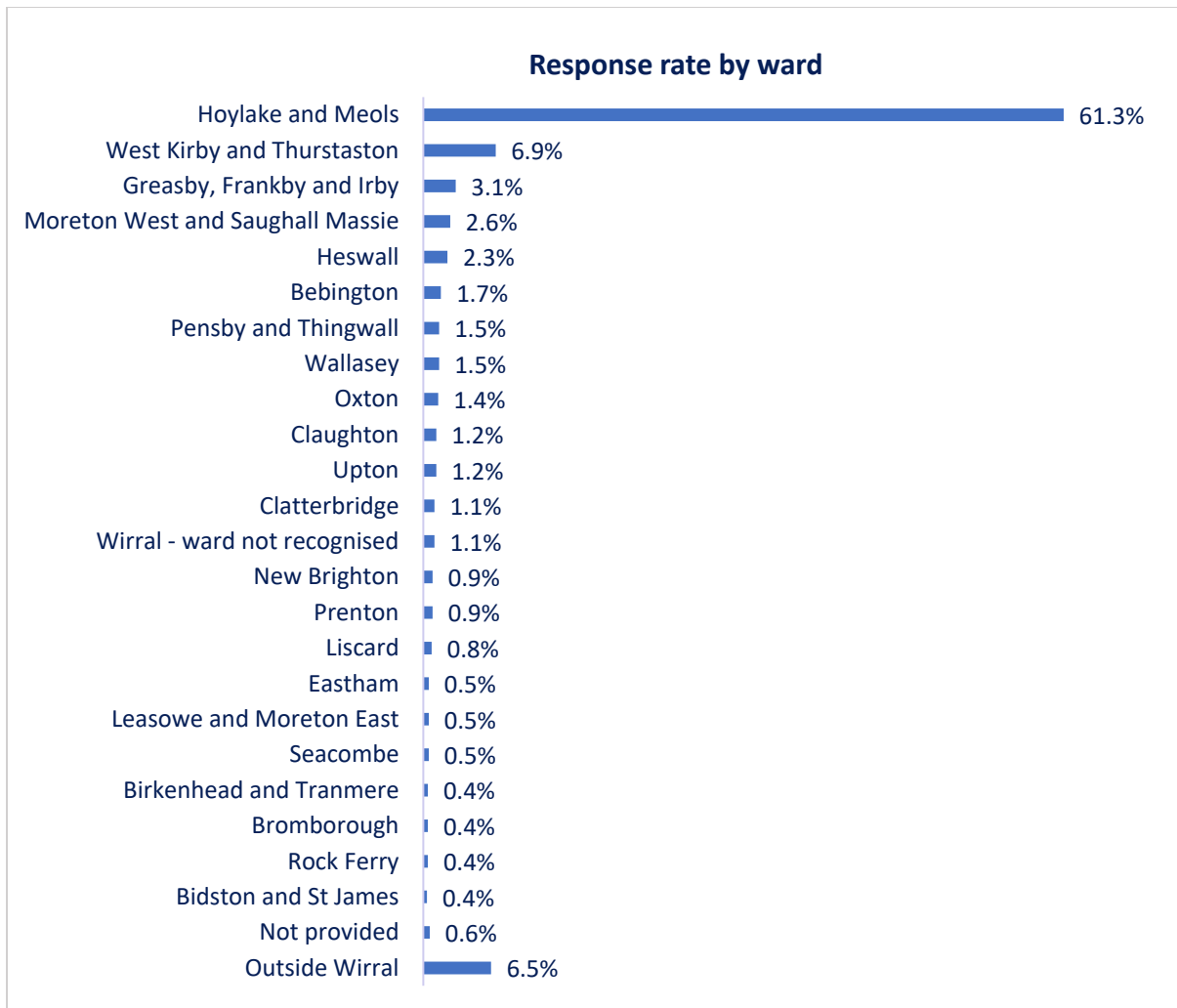


Figure 13: Chart displaying Wirral Ward representation

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
Twitter: @RSPBEngland
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).

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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



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