

Environment Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 22:58:15

Name/Organisation

Caroline Dudley

Email Address

[REDACTED]

1. What type of respondent are you?

Member of the Public

2. What Environment policy you are commenting on

EV3 - Recreation Impact on the Solent Marine Sites

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

NA

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

Yes

5. Please give details to support your answer to question 4

- **Yes - legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **not effective**
- **not justified**
- **not positively prepared**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

I believe that the creation of Suitable Alternative Natural Greenspaces (SANGs) and visitor engagement by Bird Aware Solent will not sufficiently alleviate increasing pressures on coastal wildfowl and waders during the winter in certain parts of the Island. I am not reassured by the wording in section 'EV3: Recreation impact on the Solent Marine Sites' and do not consider that the strategy is sound nor sustainable. I think that there needs to be greater dialogue between the Isle of Wight Council and conservation bodies when sensitive areas for wildlife need greater protection from increased levels of recreational use. Site-specific plans and the setting up of refuges where disturbance is much reduced need to be considered as measures to protect wildlife and our natural environment as the number of residential dwellings is increased. Such measures should put in place in a timely fashion before sites and their wildlife are detrimentally affected. Financial contributions from developers in accordance with the Bird Aware Solent Recreation Mitigation Strategy could be used to set up, enhance and maintain these refuges. The following paragraphs explain the reasoning behind my suggestion using an example of a site where increased visitor pressure has been negatively impacting waterfowl and waders for many years and will increasingly continue to do so.

I include supporting evidence as attached files in Question 10.

9. Do you have any comments on the policies map?

No

10. If you wish to attach any documents please do so here

DOCX [Island Planning Strategy C Dudley letter.docx](#)
28.3KB

DOCX [Sanderlings at Ryde - a review.docx](#)
2.5MB

11. Do you wish to request to appear at the hearing sessions that will take place?

No

12. Please outline why you would like to attend?

NA

Mrs Caroline Dudley

19th August 2024

Island Planning Strategy Regulation 19 Planning Service
Seaclose Offices
Fairlee Road
Newport
Isle of Wight
PO30 2QS

Dear Sir/Madam

I believe that the creation of Suitable Alternative Natural Greenspaces (SANGs) and visitor engagement by Bird Aware Solent will not sufficiently alleviate increasing pressures on coastal wildfowl and waders during the winter in certain parts of the Island. I am not reassured by the wording in section 'EV3: Recreation impact on the Solent Marine Sites' and do not consider that the strategy is sound nor sustainable. I think that there needs to be greater dialogue between the Isle of Wight Council and conservation bodies when sensitive areas for wildlife need greater protection from increased levels of recreational use. Site-specific plans and the setting up of refuges where disturbance is much reduced need to be considered as measures to protect wildlife and our natural environment as the number of residential dwellings is increased. Such measures should be put in place in a timely fashion before sites and their wildlife are detrimentally affected. Financial contributions from developers in accordance with the Bird Aware Solent Recreation Mitigation Strategy could be used to set up, enhance and maintain these refuges. The following paragraphs explain the reasoning behind my suggestion using an example of a site where increased visitor pressure has been negatively impacting waterfowl and waders for many years and will increasingly continue to do so.

A significant increase in disturbance of overwintering birds through greater use of the beach for recreation has been and continues to be seen at Ryde. This disturbance will only rise as more housing is built within the catchment area of Ryde and surrounding areas. The problems at Ryde have been identified in environmental reports to the Isle of Wight Council since at least 2012 (see 'An Assessment of the Recreational Impacts on the European Sites of the River Medina and Ryde Sands on the Isle of Wight with Recommendations for Mitigation prepared for the Isle of Wight Council' in March 2012 by Natural Enterprise, https://www.solentforum.org/solent/our_biodiversity/Birds/FE16%20-%20Assesment%20of%20Recreational%20Impacts%20on%20River%20Medina%20&%20Ryde%20Sands.pdf). Despite this, no action has been taken by the Isle of Wight Council to alleviate pressures on the sections of beach where the most sensitive wildlife occurs.

The Ryde Conservation Area Appraisal adopted in April 2011

([https://www.iow.gov.uk/azservices/documents/1322-](https://www.iow.gov.uk/azservices/documents/1322-Ryde%20Conservation%20Area%20Character%20Appraisal.pdf)

[Ryde%20Conservation%20Area%20Character%20Appraisal.pdf](https://www.iow.gov.uk/azservices/documents/1322-Ryde%20Conservation%20Area%20Character%20Appraisal.pdf)) gives the environmental designations of Ryde Sands: 'Ryde Sands is part of Ryde Sands and Wootton Creek SSSI and is the most extensive area of sandflats in the Solent. It forms part of the Solent & Southampton Waters Special Protection Area (SPA), designated under the European Habitats Directive, and the Solent and Southampton Waters Ramsar site, a wetland of international importance under the Ramsar Convention. Ryde Sands support the most extensive areas of Eelgrass (*Zostera*) beds in the Solent. Eelgrass beds are a national priority habitat and are a food source for wintering Brent geese. Ryde Sands supports important populations of wintering and passage waterfowl and waders. These birds use the intertidal areas for feeding and undisturbed beaches for roosting at high tide. They are susceptible to disturbance and it is important that, during the sensitive winter months, currently relatively quiet and undisturbed stretches are maintained as such.'

Therefore, it was recognised in this appraisal that it is important to maintain quiet and undisturbed stretches of Ryde Sands for these notable populations of wintering and passage waterfowl and waders to enable them to feed and roost. Sadly, few, if any areas, are now 'relatively quiet and undisturbed'. Regular disturbance from people and dogs means that birds are not able to feed as effectively and expend energy flying away from the disturbances. They are then less efficient at maintaining and increasing body weight to survive the winter and undertake their long spring migration to breeding areas in Greenland, the Arctic and Siberia. They may arrive on the breeding grounds in suboptimal condition and so have a poor breeding season. This has a negative impact on the survival of these species.

Smaller wading birds are less resilient to disturbance. At Ryde, these include Dunlins, Turnstones, Ringed Plovers, Bar-tailed Godwits and Sanderlings. The Sanderling population is a specifically Notified Feature of Ryde Sands to Wootton Creek Site of Special Scientific Interest (SSSI) but now that peak numbers are below 200 individuals it is identified as being in an Unfavourable Declining SSSI condition.

The Natural England Designated Sites View for the Sanderling at the Ryde Sands to Wootton Creek SSSI was updated earlier this year (27th March 2024) as follows (see <https://designatedsites.naturalengland.org.uk/SiteFeatureCondition.aspx?SiteCode=S200022&SiteName=Ryde%20Sands%20and%20Wootton%20Creek%20SSSI>):

'Ryde Sands and Wootton Creek SSSI is of special importance in providing foraging and roosting habitat for wintering wildfowl. Until recently wintering Sanderling utilised the intertidal areas and areas above high water mark for feeding and roosting in nationally important numbers. This is the principal wintering site on the Isle of Wight for this species. In addition, although not present as a qualifying species of Solent & Southampton Water Special Protection Area (SPA), and Solent and Southampton Water Ramsar site, they do contribute towards the special interest of both sites as an important part of the wintering bird assemblage utilising the Solent coast. The Sanderling is classified in the UK as Amber under the Birds of Conservation Concern and Red List for Birds (2021) although the national wintering population is currently showing an increase, according to BTO data. The Sanderling

is a smallish, plump and energetic wading bird that is usually seen running along the tideline of sandy beaches and sandbars in small groups from October to April. They do not breed in the UK but are long distance passage and wintering visitors from high Arctic breeding grounds in Siberia and Greenland. They eat small marine worms, crustaceans and molluscs. Monitoring of the number of birds utilising Ryde Sands and Wootton Creek SSSI has indicated that there is a steady decline in numbers. This change is not fully understood. According to BTO data, there is evidence of an eastward change in the distribution of wintering Sanderling in the UK for reasons that are not clear. A better understanding of Sanderling ecology, possible reasons for the distributional change and the implications for the overall population is required. Even so, there is evidence of changes in and around the Ryde Sands and Wootton Creek SSSI which may be exerting pressure on the local wintering population. For the wintering Sanderling population to be considered to be in a favourable condition at this SSSI the basic target set by Natural England is that numbers should be at or close to the number present at the time of the most recent revision of the SSSI, allowing for natural fluctuations. The baseline target number has been set at 200 individuals, based upon monitoring data for the 5 year period preceding SSSI designation. The assessment of whether the target is being met is calculated by comparing the most recent 5-year peak mean count with the baseline and long term trend. This most recent data has been generated from BTO Wetland Bird Survey (WeBS) counts and the latest 5-year peak mean is 99 individuals, which indicates that numbers have halved since the time of SSSI designation. At least part of this change may be due to local changes in habitat extent and suitability. Sanderling are vulnerable to high levels of disturbance from recreational activities, particularly walkers and dogs. They are able to tolerate moderate disturbance when feeding but not when roosting during high tide. A significant increase in recreational activity in recent years has made their traditional roost site frequently untenable. This is well evidenced by local long-serving expert observers, including BTO surveyors, Bird Aware Wardens and members of the Wader Study Group. Sanderling appear to have largely abandoned the raised beach in favour of the seawall for roosting, but increased recreational use of the seawall may be causing significant disturbance. Bird Aware has formally reported that wardening efforts have proved insufficient to resolve the issue and so additional mitigating action may now be required. Remedial actions such as the provision of specific Sanderling high tide refuge areas, possibly including exclusion fencing and explanatory signage should be investigated.'

Between winters 2005/06 and 2019/20, the mean of peak counts of Sanderlings at Ryde according to the *Isle of Wight Bird Report 2020* was 229 (maximum 300 in 2017/18, minimum 182 in 2011/12 with figures over 200 in all other years bar 2014/15 (183), 2016/17 (187) and 2018/19 (193)). At 200 or more individuals, the species was occurring in nationally important numbers. The peak count in 2019/20 was 210, in 2021/22 it was 146, in 2022/23 it was 120 and in 2023/24 it was 110.

This decline in numbers has coincided with increased beach usage by people and dogs. Sanderlings feed in groups on the tideline making them very vulnerable to disturbance when dogs and people walk near the tideline or enter the water. I and colleagues have observed

the birds being repeatedly flushed by dogs off leads, walkers, kite surfers, fishermen, etc. The other small wading bird species suffer similar disturbance. Sanderlings also roost in groups, sometimes with these other species, particularly on the revetment below the sea wall between the Marina and Hovertravel, on the Hovertravel apron and on the rocks and beach at Seaview Duver. They are also easily disturbed by beach users and dogs when roosting.

Bird Aware Solent does an amazing job, but the rangers cannot be everywhere at once. Even with two wardens on the Island, or three or four, it would not be enough. The current lady is extremely dedicated and engages extremely well with the public but Ryde Sands is an extensive area to cover, particularly at low tide, and is not the only area on the Island that she needs to cover.

The report 'Initial review of the effectiveness of the Bird Aware Solent strategy' by Footprint Ecology in 2023 (<https://birdaware.org/solent/wp-content/uploads/sites/2/2023/03/Bird-Aware-Solent-Strategy-Review-FINAL.pdf>) showed that Bird Aware is able to engage with 4% of visitors to the coast in a typical year. Often, people are unaware that they and/or their dogs are disturbing the birds and this needs to be explained to them. Therefore, 96% of visitors may not be aware of the disturbance they or their loose dog is causing important overwintering bird populations for which the area has SSSI, SPA and Ramsar designations. This means that disturbance levels may remain high in areas of high visitor usage. There is a lot of emphasis in the draft Island Planning Strategy document on the creation of SANGs being an effective mitigation measure (points 4.38 to 4.43). However, various reports show the limitations of their effectiveness in dramatically reducing beach usage for recreation in the winter. Being beside the sea is important for the health and wellbeing of people and they will travel further than they might normally do to walk the dog, for example, so that they can enjoy the views and the experience of being able to walk on the sand.

The survey work for 'An Assessment of the Recreational Impacts on the European Sites of the River Medina and Ryde Sands on the Isle of Wight with Recommendations for Mitigation prepared for the Isle of Wight Council' (Natural Enterprise 2012 – see link given above) showed that most of the dog walkers interviewed visited the coast year-round spending generally between 30 minutes and 2 hours exercising their dog on the sands. The main reasons for coming to Ryde were that most people loved the setting, especially the views and extent of Ryde Sands and considered it a special place. 'Many dog walkers differentiated between dogs getting muddy in fields and woodland, and getting sandy on the beach; a muddy dog was thought of as much more problematic than a sandy dog.'

The Solent Recreation Mitigation Strategy ([https://birdaware.org/solent/wp-content/uploads/sites/2/2021/10/Solent Recreation Mitigation Strategy.pdf.12](https://birdaware.org/solent/wp-content/uploads/sites/2/2021/10/Solent_Recreation_Mitigation_Strategy.pdf.12)) states: 'Suitable Alternative Natural Greenspaces (SANGs) are a key mitigation measure at some other Special Protection Areas, but Footprint Ecology recommended caution in using them for the Solent SPAs. In large part this was because a survey showed that many people visit the Solent coast for the sea views and the feeling of "being beside the sea": 34% of those

surveyed stated that nothing could be done to make an alternative site more attractive to them.'

In the 'Initial review of the effectiveness of the Bird Aware Solent strategy' (Footprint Ecology 2023) states: 'There is evidence that SANGs around the Solent are working to deflect visitor use, for example the Alver Valley is estimated to draw around 1,300 visits a week that would otherwise have taken place at the coast. Data from other parts of the country also provides evidence that SANGs can be effective in a coastal environment. The draw of SANGs is however relatively small – i.e. visitors tend to live in close proximity.'

In July 2023, Fareham Borough Council introduced an additional seasonal dog exclusion zone at Hill Head to safeguard protected wintering birds between 1st October and 31st March and this came into effect last winter (see

https://www.fareham.gov.uk/latest_news/pressrelease/pr_20230707_1). Bird Aware is involved in this project. I feel that the Isle of Wight Council should be able to set up such areas here on the Island to protect important areas for wildlife from disturbance. At the time of the 2012 Natural Enterprise report mentioned above, the favoured roosting and feeding area of Sanderlings was in the vicinity of the Wimpy Kiosk (now the Big Kahuna Café) and it was recommended that disturbance pressure be reduced in this area by dissuading visitors from accessing the beach at this point; it was recommended that a positive message could be set by referring to the area as a 'bird beach'. This area is now too disturbed by humans and dogs for the birds and their preferred area has moved west, between Ryde Marina and either side of Ryde Pier, including the area around the Hovertravel. This area gets less footfall than other areas of the beach but the birds are still suffering here from disturbance by beach users. It would be ideal to create a bird refuge area here as the Brent Geese, other wildfowl and waders are also attracted to this area. For reasons of safety (Marina entrance and Hovertravel working area), it is advisable to keep public use of this area limited anyway. It should be considered an asset to Ryde and the Isle of Wight rather than as a negative exclusion zone. The area could be marked out with coloured buoys and/or marker posts in the east and the pier would be the westernmost boundary. Bird Aware could produce explanatory signage. The birds may be viewed and enjoyed from the sea wall.

I feel that something needs to be included in the Island Planning Strategy on site-specific projects and the creation of bird refuges when more than SANG and Bird Aware visitor engagement are required to protect sensitive and locally/nationally important sites for sensitive and locally/nationally important species. Refuges in public areas need to be created under the authority of the Isle of Wight Council, with expert advice from members of the Solent Recreation Mitigation Strategy. The strategy proposes 'site-specific projects to better manage visitors and provide secure habitats for the birds' and I think that the Isle of Wight Council needs to be aware that such site-specific projects and action will still be needed, despite the mitigation measures stated in EV3 of the Island Planning Strategy. It should be willing to cooperate and set up such areas within a short timescale otherwise birds and other wildlife may decline to unrecoverable levels leading to a loss of biodiversity and ecological value of a site.

Such recognition might be included in point 4.36 and cover the following information:
'Where the provision of SANG is unlikely to sufficiently reduce visitor pressure to important areas for wildlife, mitigation for new residential development can be provided through financial contributions towards the setting up, enhancement and maintenance of refuges where visitor pressure is reduced at sensitive periods of the year.'

The financial contribution in the case of Ryde Sands could be used to pay for marker buoys or posts that define the refuge area, explanatory signage and the creation of safer roosting sites above high-tide level (particularly important with climate change and sea-level rise). The Ryde beaches cover an extensive area and there should be sufficient space for recreational usage as well as undisturbed areas for wildlife. In 2019 the Isle of Wight was designated a UNESCO Biosphere Reserve in recognition of the unique combination of nature, people and places we have here, where communities and the environment work together in an increasingly sustainable way. This is something of which to be truly proud but we need to work hard at maintaining this harmony as user pressure increases and find ways of protecting the natural environment and its wildlife when additional measures are needed. Ryde Sands makes a significant contribution to biodiversity in Ryde and on the Isle of Wight. Being able to see wildlife is beneficial to our wellbeing and health and we should do all that we can to protect it.

Yours faithfully

Caroline Dudley

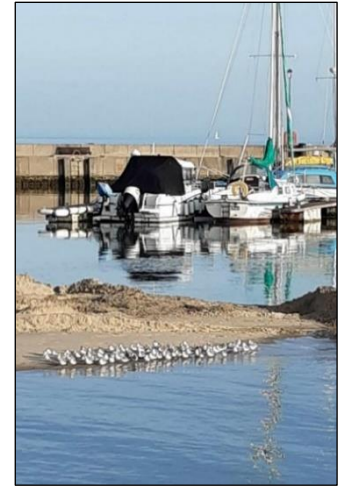
Sanderlings at Ryde – a review



Sanderlings feeding in typical fashion at the water's edge just west of Ryde Pier (viewed from the St Thomas Street car park), with Brent Geese on the sea behind on 27th January 2023. This method of feeding makes them extremely vulnerable to disturbance by people and dogs walking near the water's edge and by dogs running along the beach and into the water.



Flock of Sanderlings roosting with Ringed Plovers on the revetment below the Quay Road car park near the Hovertravel in November 2015. This is still a regular roost site but isn't suitable during some high tides or on very windy days as the tide can overtop it. Sanderlings may then move to the Hovertravel apron, fly to Springvale or fly back across the Solent for the duration of high tide. If the birds can't feed and roost undisturbed, they won't be able to put on the fat reserves needed to get them through the winter and to travel back to the Arctic in suitable condition for breeding. Repeated disturbance means that they are forced to expend unnecessary energy in flying to other areas.



Left: Sanderlings on the beach east of the Marina in October 2018. This was a favoured feeding and roosting area but is now too disturbed for them. **Right:** About 90 Sanderlings roosting on a sandbar in the Marina, 1st February 2024. Although roosting here has not been observed regularly, the Marina seems the least disturbed place at times during the winter when it is free of people.



Left: Flock of around 100 Sanderlings roosting on the Hovertravel landing, 7th April 2015. **Right:** Flock of 29 Sanderlings feeding on the Hovercraft apron on 10th February 2024. Seaweed provides food for the birds in the form of small crustaceans and flies. Although this is a good feeding area and relatively undisturbed by walkers and dogs, the birds can be affected by hovercraft arrivals and departures. They generally move to the side or to the front revetment when the hover is active, then back when it has gone.



Sanderlings roosting on Ryde Sands on 24th October 2018. A flock of Ringed Plovers and a few Dunlins fly in to join them. These are among other wading birds, including Oystercatchers, Curlews and Turnstones, which are also suffering from increased disturbance on Ryde Sands.



Sanderlings roosting on the rocks at Seaview Duver (left-hand image), on 10th February 2024. This flock of 29 birds had been feeding on the Hovertravel apron but were flushed from there and flew to the beach at Hersey. They were then flushed again by a man and his son walking on the beach and flew to a small promontory to the west (right-hand image), which was surrounded by water and hopefully safe from further human disturbance until the tide fell again. Flocks of up to 50 birds have been seen recently trying to roost at Seaview Duver, usually on the beach directly in front of the entrance to Hersey Nature Reserve, but are often disturbed by people walking along the beach or climbing over the wall and rocks, even at high tide.



A flock of almost 250 Sanderlings roosting on Ryde Sands on 24th November 2014. The last count of more than 200 birds was in January 2020 (210 birds). High counts in the last two years are 146 in 2022, and 120 in 2023, both on 26th January.

Document prepared by Caroline Dudley in March 2024 with assistance from Eileen Hughes.
Photographs by Eileen Hughes and Karen Granger (Marina roost).