

Correspondence from Petitioner

To: Welsh Assembly Petitions committee.

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From: Roger Price

Ref: P- 04 -369 Against the Proposed Cardiff to Newport Coastal Path and beyond.

Date: 22.04.2012

Thank you for your email of the 5th and attached letter ref JG/05547/12. Since originally sending information to the Petitions committee, I have written to eight Cardiff and Newport Assembly Members and also Newport Council. I also sent them two pages of 'The Severn Estuary Regulation 33' by Natural England and the CCW, in particular, item 5.7.2.3 on the subject of Vulnerability, which I enclose for your information and which accords with our viewpoint. I would like to repeat that our concerns are based on many years of experience of the response of the shorebird populations to human presence, and that is why we do not agree with the optimistic conclusions of the assessment previously made or that mitigation measures will be effective. We sympathise with the Minister because he is reliant on the information passed to him.

With regard to the suggestion that screening will be provided, that seems to me to be fraught with practical difficulties. Would it make sense for walkers to walk between Cardiff and Newport behind a screen? We consider some 5.5 of the 8.5 mile stretch Cardiff to Newport to be vulnerable to disturbance. Also there is a 2 mile stretch of saltmarsh at Collister Pill on the way to Chepstow to consider.

I enclose an explanatory sketch showing a cross section of some of the foreshore and the adjacent sea bank. Where the bank is separated from the immediate sea, it is an earthen structure typically approx. 8ft high or more. This is a very exposed area and has much stronger winds than the streets of Cardiff for example. It's difficult to conceive of a strong appropriate form of screening, even made of galvanised steel, and the costs would be considerable and the appearance awful. I imagine the Minister's letter relates to some very restricted screening and therefore ineffective.

The photo I enclose shows Peterstone saltmarsh looking towards Newport (Img 2076), with the seabank on the left, on top of which it is proposed to construct the Coastal Path. Photo Img 2506 shows Shelduck gathering on the grassy area close to this seabank at high tide. Rumney Great Wharf is used in the same way. Img 1773 shows a flock of Knot alighting behind Curlew at high tide in the same area. These photographs were only possible because the photographer was concealed from the birds, which were not far from the seabank. Img 1634 is of Dunlin and Knot alighting at Peterstone Gout Pill. Img 1639 is of a flock of about a 1000 Knot. We do get flocks of up to 5000 Dunlin, but I don't have a photograph of this to show.

As you may know, the maps showing the route of the proposed coastal path are accessible on the CCW website www.ccg.gov.uk. I have followed the path from the River Dee to Chepstow on the website and it must be remarked, that the path deviates from the coast on many occasions across fields and countryside and roads and into built up areas.

I have noted, starting in North and West Wales, as a minimum: 7 miles deviation from the coast at Penrhyndeudraeth. Fairbourne to Twyne 8 miles. Aberdovey to Borth 14 miles. Many miles around military firing ranges, nature reserves. Margam steelworks (6miles) and other industrial sites and docks. At Cardiff, having crossed the Barrage, the path is a street walk into Cardiff, up around the dock area and Atlantic Wharf and then back to Cardiff foreshore.

If terminating the Path at Cardiff is not acceptable, then I would argue that the only acceptable outcome from a responsible wildlife/birdlife conservation committed Government, would be to route the coastal path between Cardiff and Newport away from the coast and the B4239 (which has access points to the seawall and should therefore be avoided). In support of this I enclose a suggested route running across country just north of the Cardiff to Newport railwayline using existing tracks and roads but requiring some new tracks, total length 8 miles. This would be in line with what has been done elsewhere.

North East of Newport on the coast, we would suggest that the Collister Pill saltmarsh which has similarities with Peterstone, should be bypassed from Magor to Caldicot Moor and join the coast bypass which is already shown for the military firing range. I enclose a suggested route for this. In addition, an odd short deviation of the path from the road down to Goldcliffe Pill and back to the road, should be deleted in our view. These Pills or creeks are formed where the reens drain into the sea through sluices.

Their sheltered thick muddy habitat is particularly attractive to certain wading birds like Shanks, Sandpipers, Herons, Egret and also duck. So the less disturbance the better for these often scarce species.

If these new inland Coastal Path routes bypassing sensitive areas important to birds were adopted, our most important concerns would be addressed. In addition there would be much less of a requirement for effective regular Local Authority monitoring etc. with the associated costs, and the paths themselves, protected from the harsher environment close to the shore, should require much less maintenance.

Yours Sincerely

Roger Price - writing on behalf of those supporting the Petition.

Enclosures :

Severn Estuary Regulation 33 front page.

Reg.33 Item 5.7.2.3—Vulnerability.

Cross sectional sketch of the zones close to the seabank.

Photo jpeg image 2076 Peterstone Saltmarsh and seabank.

Img 2506 Shelduck social gathering at high tide.

Img 1773 flock of Knot alighting behind group of Curlew at high tide .

(Knot migrate from Arctic Canada and Greenland to the UK for the winter).

Img 1634 Dunlin and Knot alighting on the mudflat at Peterstone Gout Pill.

Img 1639 a flock of the same Knot about 1000 in number.

Severn Estuary Regulation 33 Front Page

The Severn Estuary / Môr Hafren European Marine Site

comprising :

**The Severn Estuary / Môr Hafren
Special Area of Conservation (SAC)**

**The Severn Estuary
Special Protection Area (SPA)**

**The Severn Estuary / Môr Hafren
Ramsar Site**

**Natural England & the
Countryside Council for Wales' advice
given under Regulation 33(2)(a) of the Conservation
(Natural Habitats, &c.) Regulations 1994, as amended.**

June 2009



A Welsh version of all or part of this document can be made available on request
from the Countryside Council for Wales

Reg.33 Item 5.7.2.3 – Vulnerability

Severn Estuary SAC, SPA and Ramsar Site: Regulation 33 Advice from CCW and Natural England, June 2009

affect the suitability saltmarsh areas as resting and roosting sites for birds where open terrain with low vegetation is an important factor.

viii. Noise or visual disturbance

Overwintering birds are disturbed by sudden movements and sudden noises. This can have the effect of displacing the birds from their feeding grounds. Disturbance can prevent the birds from feeding and in response they either a) decrease their energy intake at their present (disturbed) feeding site through displacement activity, or b) move to an alternative less favoured feeding site. Such a response affects energy budgets and thus survival. There is intermittent disturbance to the internationally important migratory species and the waterfowl assemblage from both the landward and seaward side of the site which has increased in recent years, due to the estuary becoming more populated and the development of all weather recreational pursuits. All supporting habitats are currently **highly vulnerable** to noise and visual disturbance.

ix. Toxic contamination through the introduction of synthetic and/or non-synthetic compounds

Waterfowl are subject to the accumulation of toxins through the food chain or through direct contact with toxic substances when roosting or feeding. Their ability to feed can also be affected by the abundance or change in palatability of their prey caused by toxic contamination. At the moment there is no evidence to show that this is the case on the Severn Estuary, but the estuary is vulnerable to oil spills and there is a continuous discharge of toxins into the estuary, some of which bind to the sediments. This is an area that requires further assessment. The intertidal mudflats and sandflats and the saltmarsh are currently **highly vulnerable** to the introduction of synthetic and non-synthetic compounds.

x. Changes in nutrient loading

Changes in organic or nutrient loading can change the species composition of the plants on the saltmarsh and thus the structure of the sward. Increases in nutrients can cause excessive algal growth on the mudflats, denying the birds access to their invertebrate prey and changing the invertebrate species composition in the sediment. However, high nutrient loads can also be beneficial to some species of birds by increasing the density and size of prey items. Though the water quality has been improved in recent years there are still local areas of concern. On balance, any increase in nutrient loading should be avoided. At present the intertidal mudflats and sandflats are **moderately vulnerable** to this category of operation.

xi. Changes in thermal regime

It is thought unlikely that changes in the thermal regime within the Estuary will affect the designated bird species of the assemblage directly but such changes may have marked effects on the community composition of supporting habitats on which these species are dependant for feeding. The intertidal mudflats and sandflats of the estuary are considered to have **moderate sensitivity** and **moderate exposure** and therefore **moderate vulnerability** to changes in thermal regime. Impacts on these habitats may affect the long term survival of individuals (in terms of energy and competition) or alter behavior and patterns of use or distribution.

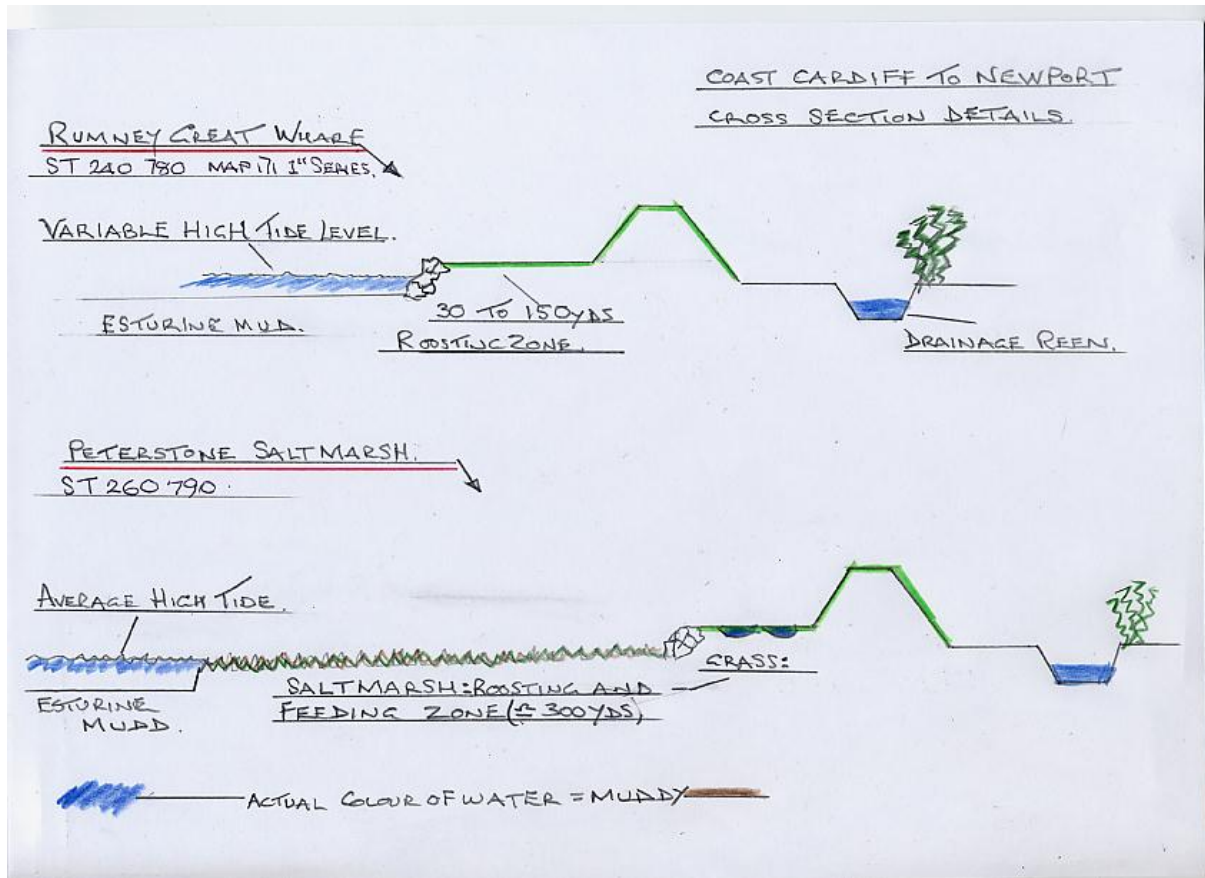
xii. Changes in salinity

It is thought unlikely that changes in salinity within the Estuary will affect the waterfowl assemblage feature directly but such changes may have marked effects on the supporting habitats on which these species are dependant for feeding. The saltmarshes, intertidal mudflats and sand flats and hard substrate habitats (rocky shores) of the estuary are considered to have **low to moderate sensitivity** and **high exposure** and therefore **moderate to high vulnerability** to changes in salinity. Impacts on these habitats may affect the long term survival of individuals (in terms of energy and competition) or alter behavior and patterns of use or distribution.

xiii. Changes in oxygenation

It is thought unlikely that changes in oxygenation within the Estuary will affect the waterfowl assemblage feature directly but such changes may have marked effects on the community composition of supporting habitats on which these species are dependant for feeding. The saltmarshes, intertidal mudflats and sand flats and hard substrate habitats (rocky shores) of the estuary are considered to have **low sensitivity** and **high exposure** and therefore **moderate vulnerability** to changes in oxygenation. Impacts on these habitats may affect the long term survival of individuals (in terms of energy and competition) or alter behavior and patterns of use or distribution.

Cross sectional sketch of the zones close to the seabank



Peterstone Saltmarsh and seabank



Shelduck social gathering at high tide



Flock of Knot alighting behind group of Curlew at high tide



Dunlin and Knot alighting on the mudflat at Peterstone Gout Pill



Flock of Knot about 1000 in number

