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Dear Sir/Madam,

Hampshire and Isle of Wight Wildlife Trust wishes to make a representation regarding the current proposals for the England Coast Path between East Cowes Ferry and Wootton Bridge (IOW 1), particularly in relation to the potential impacts on nationally and internationally important wildlife and habitats from increased public access and disturbance.

While we recognise the importance of enabling people to connect with nature and the coast, the assessments undertaken to date do not provide sufficient confidence that important wildlife interests will be safeguarded. We believe the current proposals risk significant harm to sensitive habitats and species on the only part of the Island's coastline currently relatively free from disturbance.

Our key concerns are as follows:

1. Insufficient consideration of disturbance within the coastal margin

While the likely use of the coast path itself has been assessed, there has been little evaluation of how the public may use the wider coastal margin. In this location the route runs inland, creating strong pressure for people to seek direct access to the estuary and shore via alternative paths. This pressure is already evident through strong campaigns for alternative routes from access groups. This is highly likely to result in new, unplanned access routes across sensitive habitats, a risk not fully addressed in the current assessments. Informal access routes are likely to become established, with significant permanent implications for fragile habitats and ongoing disturbance to SPA features and important populations of birds.

2. Vulnerability of ancient coastal woodlands

The Kings Quay area supports an exceptional range of habitats: ancient coastal woodlands, estuarine transitions, mudflats, saltmarsh and grazing marsh. These fragile ecosystems are highly sensitive to trampling, erosion and disturbance. Comparable Solent sites demonstrate how quickly soils and ground flora can be degraded by even moderate levels of public use. The current assessments underplay this vulnerability and incorrectly assume natural barriers will prevent access.

The HRA has not properly considered the narrow fringe of ancient woodland alongside Kings Quay estuary, which is explicitly included within the SAC for its conservation value. This is the habitat most vulnerable to disturbance, yet its significance is largely ignored in the current analysis.

3. Lack of robust baseline data for bird populations

The Habitats Regulations Assessment relies on incomplete datasets. In particular, the use of Solent Wader & Brent Goose Strategy data and Wetland Bird Survey counts has left significant gaps, notably regarding high tide roosts and field use by curlew and brent geese around Kings Quay. Fields at Palmers

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Farm, to the east of the estuary, are known to attract significant numbers of curlew, yet these areas were not surveyed or adequately assessed. These supporting fields are critical for the SPA bird populations, particularly at high tide when intertidal feeding grounds are unavailable, and they face direct risk from increased access pressure. Without targeted surveys, the assessment cannot reliably conclude that there will be no adverse effects on internationally important bird populations.

4. Failure to apply the Holohan judgment standard

European case law requires Habitats Regulations Assessments to reach complete, precise and definitive conclusions, free of gaps. The current assessment does not meet this standard, particularly in relation to estuary-edge habitats and adjoining fields used by birds.

5. Insufficient safeguards

We are also concerned that the proposals place undue reliance on signage and deterrence measures to prevent public access into highly sensitive areas. Experience elsewhere shows that such approaches are rarely effective in protecting fragile habitats over the long term. To provide the necessary safeguards, stronger exclusions and restrictions should be applied under Section 26 of the CROW Act, or through equivalent mechanisms, to prevent harm.

6. Impact on Palmers Brook nature reserve

We are working closely with the landowner of the site formerly known as Palmers Farm to transform the land there into a sanctuary nature reserve. Its value to wildlife will therefore increase over time. Whilst the owner is content with the route of the coastal path itself, we are very concerned about unplanned routes spreading across the coastal margin into the rewilding area, impacting the ability to create a sanctuary site for wildlife, either through direct disturbance or impacts on management.

Conclusion

As currently proposed, the England Coast Path route and associated coastal margin pose risks to one of the Isle of Wight's most important natural and undisturbed coastal areas. The proposals fail to demonstrate compliance with the legal duty to avoid adverse effects on SSSI, SAC, SPA and Ramsar features. There is a real risk of lasting damage to irreplaceable ancient woodland and estuarine habitats, as well as significant disturbance to internationally important bird populations.

We urge Natural England to:

- Reassess the proposals with full ecological surveys, particularly of supporting habitats for SPA birds.
- Properly account for the vulnerability of ancient coastal woodland within the SAC boundary in terms of the potential for disturbance and erosion impacts.
- Apply robust exclusion measures to protect ancient woodland, intertidal transitions, and key supporting fields from disturbance.
- Introduce robust restrictions on access within the coastal margin to protect sensitive habitats.

We remain committed to working constructively with Natural England to achieve a solution that balances public access with the long-term protection of our most important wildlife sites.

Yours sincerely



On behalf of Hampshire and Isle of Wight Wildlife Trust

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