

**UPDATE FOLLOWING THE PUBLICATION OF A REPORT TO THE PLANNING COMMITTEE  
– TUESDAY 21<sup>ST</sup> MARCH 2023**

1.           **20/01061/FUL**
- Demolition of agricultural buildings and the garage to No 125 Marlborough Road; Proposed development consisting of 473 new dwellings (single and two storey dwellings (inclusive of 35% affordable housing) and inclusive of the conversion of the Coach House into pair of semi-detached dwellings; (leading to a net gain of 472 dwellings), single storey café and two storey doctors surgery and B1 office space with associated site infrastructure (inclusive of roads, parking, photovoltaic pergolas, garages, bin and bikes stores, below ground foul waste pump, electric substations, surface water detention basins and swales, landscape and ecological mitigations and net biodiversity enhancements); Proposed vehicular accesses off Bullen Road and Appley Road; Proposed public open spaces, Suitable Alternative Natural Greenspace and Allotments; Proposed three public rights of way; Proposed access, parking and turning for No 125 Marlborough Road and associated highways improvements (Revised plans, revised drainage strategy and flood risk, additional highway technical note and updated appendix S to highway chapter of environmental statement)(readvertised application) at land south of Appley Road north of Bullen Road and east of Hope Road (West Acre Park), Ryde Isle of Wight**

### **Nature of Update**

An additional letter of representation has been received raising concerns in respect of matters that can be summarised as following:

- Who provided the count data?
- Who were the surveys undertaken by?
- If it is not clear how many times the site was surveyed the data is not sufficiently robust to qualify the usage of curlews and therefore its importance to curlews

- 15 curlews is not insignificant having regard for local populations in the New Forest being just 40 breeding pairs. Core area comparisons are unrealistic.
- New habitat must be in place and established before any development
- New habitat may be attractive but the landscape isn't. The curlews may use this habitat with no qualms, but they may not do so.
- The presence of development opposed to farmland may deter its use and their flight path may be disrupted and disturbed.

### **Officer conclusion**

The count data was provided by Hampshire County Council's Hampshire Biodiversity Information Centre. The Strategy sets out that "Sites were surveyed by expert surveyors including WeBS counters and trained volunteers. Three years of ground-truthing and bird movement survey work was carried out in three geographical phases: the Eastern Solent; the Western Solent, and the Isle of Wight. The Eastern Solent data gathering took place in the winter of 2016/17, the Western Solent in 2017/18 and the Isle of Wight in 2018/19. Over 25 surveyors took part".

The identification of the site as 'low use' is defined by the Strategy itself.

The 'Summary of Survey Results' within the Strategy (section 2.3) sets out that:

"Over 25,000 records have been collated since the winter of 2006-7, with over 10,000 gathered during 2020 survey period. Of the 1,036 sites identified for survey, 802 sites had records for waders and 649 had records for brent geese.

A total of 24 different wading bird species were recorded, with curlew, oystercatcher and redshank being the most frequently recorded species, the highest individual count was for dunlin with 15,000 recorded twice in Chichester Harbour in a single location. For brent geese, counts were reported for numbers in excess of 3,000, with maximum counts of 3,500 at Farlington Marshes and 4070 on Hayling Island"

In allocating points to sites three metrics were used with points allocated accordingly:

- 1) Comparison to national population thresholds
  - 0: site has less than the GB threshold for any species
  - 1: site has more than the GB threshold for any species
- 2) Comparison to SPA designated features of interest
  - 0: site has <1% of SPA's designated population
  - 2: site has 1-5% of SPA's designated population
  - 3: site has >5% of SPA's designated population
- 3) Features of interest
  - 0: site has <1% of SPA's designated assemblage population
  - 2: site has 1-5% of SPA's designated assemblage population
  - 3: site has >5% of SPA's designated assemblage population
- 4) Local value
  - 0: site has no records higher than the local value for any species
  - 1: site has more than one record higher than the local value of any species
- 5) Max count of any target species recorded on site

- 6) Species incidence
  - 0: sites not passing the two species incidence metric thresholds
  - 1: site passing the two species incidence metric thresholds
- 7) Network score (sites were included for their network value if they scored:
  - 2 or higher for bottlenecks and/or
  - 2 or higher for hubs

Low use sites are identified as those which are gained a score of 0.

The Strategy includes a section (3.3) of the limitations of the data, which outlines that “It is important to recognise several limitations of the data. The use of sites fluctuates with population size, which is dependent on breeding success at summer breeding grounds; usage can therefore change from year to year. In certain winters the numbers of juvenile brent geese can be relatively low and therefore recent surveys may not be representative of sites used by these birds in more productive years.

The use of some sites will vary if the land use or management changes. For example, if a field is ploughed or allowed to scrub over, it will no longer be suitable to for use. The data therefore can only reflect the use of sites as dictated by their management regime during the study period.

The use of many sites is affected by disturbance from, for example, recreational activity, which can also vary considerably according to (i) day of the week e.g. greater use of sports pitches at weekends and Wednesday afternoons (ii) weather e.g. more dog walkers, golfers etc. may be present during dry weather. It is also likely that data collection by recorders has been biased towards (i) weekends and (ii) dry weather, which may mean numbers have been under recorded, as these are the times when higher levels of disturbance are likely.

The complete use of sites under extreme weather conditions is also unlikely to have been captured. For example, in extreme winters brent geese have been known to fly far inland to find suitable feeding sources, this has been observed over the course of the surveys and may occur again in future years.

In addition, recorder effort has been unevenly distributed with the result that some sites have been counted more regularly than others. Ideally, sites should have been counted every two weeks. This has been addressed in part by applying the new classification method for low use and candidate sites.”

The current site IOW 46 is impacted by land management changes where it could be no longer suitable, while the proposed mitigation land would be protected from changes and recreational disturbance.

Officers recognise that no data has been provided for visits when no birds were counted. Only positive counts were reported. However, as set out in the above extract sites should have been counted every two weeks.

The mitigation would be secured prior to the land being lost as part of the requirement of the Section 106 Agreement.

Officers cannot dispute that the mitigation land may or may not be used. However, this could be said of any habitat provision/enhancements. There is an accepted practice of translocation and mitigation/enhancement and the proposed scheme has been agreed with Natural England as suitable mitigation.

The Strategy references a case study of a site in Portsmouth, which developed an area of playing field. "The mitigation involved creating a Brent goose "refuge" and area of fenced-off grassland close to the area being lost. The refuge area was a success and post-mitigation monitoring has shown that geese continue to use the site".

No change to recommendation.

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21<sup>st</sup> March 2023