

Response to Pinsent Mason letter of 30th August

Interested Party 20030651

Dear Madam

Sunnica's response to questions asked by the Secretary of State includes the following statements.

Section 2.2

"Where arable farmland is to be reverted to semi-natural grasslands, the preferred option for achieving this is by skimming off the existing ploughed topsoil which effectively reduces phosphate availability. Alternatively, options to reduce phosphate levels can include a continuation of cropping for a number of years, but without additional nutrients being added. Once ready, the soil will be subject to light harrowing to prepare for the sowing of the seeds.

Section 2.4

It was identified early on in developing offsetting measures for Stone-curlew that it was necessary to apply slightly different establishment and management techniques in ECO1 due to sensitive archaeology and that these did not follow the details of plot creation and management provided by the RSPB information Note 'Managing nest plots for stone-curlews' to the letter. Therefore, to avoid any confusion, reference to this guidance was removed for ECO1 and site-specific requirements adopted. These were broadly in line with the RSPB guidance.

Since ECO1 is the major offsetting and mitigation area for the Stone Curlew and other farm birds it is vital that this is established as native grassland prior to construction taking place elsewhere.

ECO1 grew a crop of potatoes in the last 2 years. This crop has a high requirement for phosphate but potatoes are poor at absorbing phosphate from soil. A 50t/ha crop of potatoes needs 170kg/ha phosphate fertiliser applied but will only remove in the region of 50kg.

This means that cropping in recent years will have left a good level of phosphate in the soil.

The average level of phosphate in agricultural soil 0-20cm is around 1400kg/ha according to the European Commission Joint Research Centre.

The crop which would remove most phosphate would be Winter barley, at a yield of 10t/ha it would remove in the region of 85kg phosphate. In order to achieve that yield it would need proper management with nitrogen fertiliser and a full pesticide programme. Even so it is likely to take a number of years to run the phosphate levels down to the levels required with a further 2 years + to establish a reasonable grass cover.

It is unlikely that EC01 will provide suitable mitigation for Stone Curlews for a number of years.

Best regards

Dr Anne Noble