

SUMMARY OF WRITTEN REPRESENTATION

FOR RACHEL HOSIER

Your reference: 20020567

1 Impact on our family farming business:

Land take, water supply and pig enterprise.

2 Biodiversity

Normanton Down, Great Bustard, Chalk grassland creation adjacent to deep cutting.

3 Byways:

Byways 11 and 12 downgrading and links, and proposed new byway down the existing A360

4 Green Bridge 4:

Placement, width and ability to deliver biodiversity and inter-visibility links and views into western portal

5 Western portal and deep cutting:

The archaeology within the area, the effects of construction on scheduled monuments and views onto the carriageway.

6 Clashes within scheme objectives

Biodiversity vs wider access, biodiversity vs archaeology and protection of WHS vs road infrastructure

7 Poor consultation and engagement

Lack of engagement, lack of provision of information, unreported damage to farm property, damage to scheduled monument, metal pins left on site as well as archaeology finds, distress to livestock

WRITTEN REPRESENTATION REGARDING THE A303 AMESBURY TO BERWICK DOWN

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INTRODUCTION

- 1.1 I am the fourth generation of our family to be farming at Boreland Farm.
- 1.2 The farm provides our family with an income from mixed arable and livestock enterprises and through environmental schemes we have been able to enhance the existing ecology within the area. Normanton Down Reserve demonstrates what is possible when biodiversity is combined to protect some of the key World Heritage Site monuments. We are proud to have contributed to the project to bring the Salisbury Plain Special Protection Area stone curlew population back from the brink to a current stable breeding population. We are also working with the Great Bustard Reintroduction project to help re-establish this species back to its former levels within this area.
- 1.3 As a family we also take on board our responsibility to look after the land and all that dwells therein. As such, we may not be guardians under a recognised organisation, but we take on board the lifetime role of custodians of the landscape. It is in this capacity that I am making this representation.

1 Impact on family farming business

1.3 Land take

The scheme takes land from our holding over and above that required for the new road infrastructure, when the area could remain within our ownership being farmed under prescriptive management to deliver the same biodiversity benefits. Having transformed arable land around the barrows into the Normanton Down Nature Reserve with management agreements with RSPB, we have experience to do this.

1.2 Water supply

1.2.1 Our farm business and two cottages are supplied by two boreholes. There is no mains water supply and the nearest connection point is two miles from the centre of the farm and all up gradient.

1.2.2 We have concerns that during the construction of the tunnel and deep cutting at the western portal and in the operational phase, our ground water aquifers will be compromised for both quality and quantity.

1.2.3 No base line data or characterisation of our boreholes has been carried out or tracer tests to confirm that there is no link between our boreholes and the placement of the tunnel within the water table. There seems to be no recognition that our water supply is at drinking water standard.

1.2.4 Although it cannot be proved that our water supply will not be compromised, we have not been made aware of any emergency plans to reinstate our water supply either in short or long term should it be compromised for quality or quantity.

1.2.4 For the security of our business, prior to the scheme commencing, we would request that Highways England, their contractor and subcontractor provide proof of public liability insurance that will cover them should our water supply be compromised.

1.3 Pig enterprise

1.3.1 Currently an outdoor pig breeding unit rotates within the area proposed for the western portal and the deep cutting. The enterprise adds natural fertility to this area of the farm and forms part of the crop rotation.

1.3.2 The reduction of land within the area may not seem large, but in conjunction with awkward positioning of Green Bridge 4 and the addition of the new A360 bridleway. These will be biosecurity and welfare issues on the unit, which will affect its performance. Issues of trespass, dog attacks and spread of diseases as well.

1.3.3 With no guarantee that our water supply will not be compromised and with no proposals for an alternative water supply, the risk of animal welfare issues to the herd means that we would no longer be able to continue to operate the pig unit.

2 **Biodiversity**

2.1 Normanton Down Reserve

2.1.1 Our farm has always been blessed with a rich diversity of wildlife, possibly due to the fact it has few byways and therefore the intrusion of human presence into the ecology is minimal. We have built on the areas of the farm where the existing ecology has shown itself to be paramount.

2.1.2 The placement of Normanton Down Reserve was not of our choosing, but dictated by the biodiversity that was already using the area and the presence of the above and below ground archaeology. We have just enhanced what was already present.

2.1.3 The farm has had pairs of breeding Stone curlews since 1960's, which used the tightly managed grassland within our farming system. Now we have a number of plots managed specifically for the birds needs all, of which are bred on yearly.

2.1.4 During public consultations, the southern part of the WHS has been promoted for roaming and exploring the landscape and monuments. As three quarters of the land in the southern part of the WHS is privately owned, the roaming and exploring will only be possible via the network of byways within the area. This was not made clear within the consultations.

2.1.5 As such, the scheme has already put the area of Normanton Down Reserve under pressure from additional people visiting the area (to roam and explore). There is the potential for this extra recreational pressure to disturb the schedule 1 breeding stone curlew pairs that breed within the Reserve.

2.1.6 In addition, the second consultation document showed a map of the central part of the scheme with the map legend placed over the top of Normanton Down Reserve! The Reserve itself was only mention in a couple of statements referring to the adverse effects of the scheme on the Stone Curlew breeding population.

2.1.7 Currently the A303 provides a physical barrier between the two contrasting halves of the WHS with their very different characteristics. In my opinion, this works well and already delivers the great variety of WHS experiences that are available for all types of visitor to the area. The open access areas of the north of the site provide the country park experience for roaming and exploring. In contrast, the southern part of the site is tranquil, providing unique habitat for wildlife and ecology that is enjoyed by those visitors wishing a quieter more natural experience.

2.1.8 In my opinion, the mitigation proposed for the protection of the Normanton Down breeding stone curlews is inadequate. Highways England documents have even noted that the recreational pressures on Normanton Down are unknown. There is no certainty as to whether the byways 11 and 12 will be downgraded to pedestrian use only. Even if this happens, it will not prevent the pedestrian pressures on the Reserve which are the greatest threat to the breeding birds. The proposed mitigation plot at Winterbourne Downs RSPB Reserve does not follow the mitigation criteria applied to Winterbourne Stoke and is not in proximity to Normanton Down for use by any displaced breeding pairs.

2.2 Great Bustards

2.2.1 Despite this species being named within the baseline report as of National Importance/High Value, there is no mention within the OEMP of measures to mitigate the potential negative effects the scheme will have on the Great Bustard reintroduction project.

2.2.2 The effects of construction on the Great Bustards and the effects that the additional byways proposed in the western section of the scheme once it is in operation, do not seem to have been picked up.

2.3 Chalk grassland creation area adjacent to the deep cutting

2.3.1 Increased biodiversity is one of the criteria within all of the consultation documents. Yet there are no statements as to what this biodiversity will be. From reading the reports it seems as if biodiversity within this central part of the scheme is centred on chalk grassland flora and invertebrates that can withstand a mowing regime put forward in the OLEMP report and human disturbance. I wonder if this will meet the expectations of the general public that have been reading the documents.

2.3.2 Having co-created Normanton Down Reserve with RSPB, I question the proposed management of this area including the suitability of the proposed grassland seed mix for it.

3 **Byways**

3.1 Byways 11 and 12

3.1.1 Byways 11 and 12 are in proximity to the road scheme. Both byways join the A303 and are open to all traffic.

3.1.2 There are growing antisocial behaviours as a result of vehicles on the byway which are increasing year on year. Fly-tipping, illegal camping and damage to farm fences are all issues which we have to contend with. Little seems to be done by authorities to address these concerns despite reporting incidents.

3.1.3 Increased vehicular use has caused damage to the byways. Four scheduled monuments on byway 12 and one monument on byway 11 are being damaged, but there seems to be a lack of willingness for the authorities to do anything about this, despite being within the WHS.

3.1.4 We are in support of the closure of the byways which would help reduce antisocial behaviours that have an impact upon our farm business and help to preserve the vulnerable scheduled monuments.

3.1.5 We are not in support of a link between the byways unless the link is along the existing A303 as is. The link proposed at the second consultation is inappropriate as it will damage a hitherto untouched part of the WHS. Is it unnecessary and impractical when there are already two links between the byways (NT permissive path and the current A303). In addition, the link would likely lead to an increase in recreational activity in the Normanton Down Reserve, with potentially damaging consequences for the Stone curlew breeding population

3.2 New byway along existing A360

3.1.1 Consultation documents promote roaming and exploring, however, the only roaming and exploring of the monuments within this area of the WHS is via byways with no physical connection, as the majority of the land is in private ownership.

3.1.2 I question the need for this bridleway as it is not within the WHS. It is on the boundary and the inter-visibility and views of the monuments are inferior to those along byways 11 and 12.

3.1.3 A new byway in this area has the potential for Diamonds Wood (on our farm) to become desecrated, as is the case with Winterbourne Stoke clump and Normanton Gorse (on our farm). These woods are a focus for antisocial behaviours, such as illegal camping and damaging trees for firewood. They are also used as latrines!

4 Green Bridge 4

4.1 The bridge is a poor substitute for removing the whole of the A303 road from within the WHS which really would protect and enhance the OUV of the property.

4.2 I don't believe the current placement and size of the bridge fulfils the criteria within the consultation documents. The physical connectivity to the landscape with the monuments and its biodiversity benefits are only the 150m width of the bridge.

4.3 It does not allow physical connection to the monuments. It provides minimal visible connection to the monuments (a number being underground or topography inhibited) but it will provide a good vantage point of the western portal and the emerging carriageways!

4.4 Biodiversity benefits are limited to chalk grassland flora and invertebrates that can withstand the proposed mowing regime and new human disturbance within the area. No additional hedge planting is proposed to allow corridors for bats or a few brave mammals that are willing to expose themselves to the open.

5 Western portal and deep cutting

5.1 Placement within WHS

5.1.1 The placement of the western portal and the deep cutting within the WHS does not deliver a scheme fit for a WHS as initially proposed within consultation documents or in accordance with ICOMOS and UNESCO reports.

5.1.2 The road scheme should not be enhancing the setting of a single monument (Stonehenge). It should be about protecting and enhancing the OUV of the whole of the WHS. The site is inscribed under cultural heritage being Stonehenge, the monuments and the associated landscape that together show our cultural development as depicted by the funerary monuments within the landscape.

5.1.3 Connecting the landscape in one area and then putting in more lanes of tarmac deep within the archaeology in another area does not connect the landscape for understanding.

5.1.4 Standing on Green Bridge 4, it is most likely that you will be looking at the western portal and 4 lanes of traffic emerging into the WHS. This does not help understand our cultural beginnings or bring inspiration.

5.1.5 Excavating the area of the western portal and cutting and removing archaeology is not protecting and understanding the WHS. The artefacts are part of the OUV of the WHS and as such should remain in situ.

5.1.6 In addition, removal of cremations and burials (which through their placement within the landscape show our cultural heritage) is disrespecting the funerary monuments of our ancestors that shaped the WHS landscape. Placing the cremations and grave goods behind glass is not protecting the WHS. We do not remove burials from our modern graveyards and put them in museums, so why is this practice considered acceptable for our bronze age ancestors.

5.1.7 I question the time available to fully excavate the area of the western portal and the carriageways prior to road construction. This would be the only opportunity for investigating this area so full consideration would need to be given to the time to do this to research to WHS standards and not to general infrastructure criteria.

5.1.8 Methodology for excavations should be agreed with the Scientific Committee. Although its members have no direct authority within the scheme, they are a collective of British archaeologists with the most experience within this prehistory period, so are therefore best placed to give appropriate advice.

5.2 Effects of tunnelling on archaeology

5.2.1 Plans show that a number of the burial mounds are directly above the tunnel alignment. As such they will be at risk from the construction vibrations.

5.2.2 Scheduled monument 10477 (G1) is within our holding and in the location of the western portal. Out of respect to the numerous burials found in previous archaeological surveys within this location, we did not feel it appropriate to allow further archaeological investigations within the area during the 2018 archaeological survey.

5.2.3 At the location of G1 and the proximity of the western portal, the tunnel boring machine will be nearing the surface of the ground. There will be unknown vibration and stress put onto the area of G1 which have the potential to damage the surrounding area and also its relationship within the soil strata.

5.2.4 The scheme was promoted to protect archaeology yet there will be at least two barrows that have the potential to be damaged within the construction of the tunnel (that was intended to protect archaeology of the WHS).

5.3 Views from the existing A303 in the area of the western portal.

5.3.1 As this area is part of our farm, we are able to assess on the ground and refer back to scheme plans. The ground levels in this area are not straight forward, with the existing A303 being built up from a blind hollow to a level currently seen.

5.3.2 In my opinion, the views from the downgraded A303 in this built up area would be looking directly into the western portal and onto a section of the carriageways emerging from it. Despite raising this point at meetings and asking for sectional diagrams or scheme representations that take the topography into account, I have not been provided with this information.

5.3.3 The range in current topography within the area would also mean that the deep cutting would be at different levels on either side of the road as I am told that due to WHS constraints to limit construction within the area, no additional landscaping would take place. As such, there is the potential for the cutting to also be seen from the opposite side of the carriageway, as well.

6 Clashes within scheme objectives

6.1 There are a number of clashes between objectives of the scheme. Encouraging people to explore the wider area of the WHS and the impact this increase in numbers will have on the wildlife within the area.

6.2 Clashes between objectives to deliver biodiversity habitats, but limiting this to plantings within the WHS that will not obscure sight lines between archaeological monuments.

6.3 Clashes between the objectives to deliver an upgraded road within the WHS and not damage the integrity of the WHS with surface carriageways.

7 Poor consultation and engagement

7.1 As a landowner and stakeholder within this scheme I have been surprised by the lack of engagement by Highways England and their consultants. Requests for information to avoid clashes with farm operations and surveys have provided scant information. Licence agreements were breached and often reports were lacking or poorly executed.

7.2 We were disappointed that during survey work the consultants did not take better care with our family farm. Damage was sustained to a scheduled monument and farm property as well as distress caused to livestock. Metal pins were left on site that damaged our machinery and bags of archaeological finds were left on site. Even the Stone curlews that nested within the archaeological area last summer were not allowed to be left alone, instead work within the area continued daily although it was monitored.

7.3 Numerous errors within the Development Consent Order documents found especially within ecology data.