

A303 Amesbury to Berwick Down: Summary of Appendix 1 Written Representation¹

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Representing M & R Hosier, Westfield & Boreland Farms – Ref: 20020373

¹REP2-104: M & R Hosier Written Representation

A303 Amesbury to Berwick Down: Deadline 2: 8.10.7 Biodiversity, ecology and biodiversity, Appendix 1: Rachel Hosier & Tracé Williams.

- 1.1. The biodiversity appendix outlines the impacts upon Normanton Down nature reserve owned by M & R Hosier; lack of understanding of the entire breeding ecology of the Stone Curlew; lack of recognition for the reintroduced Great Bustard, and regarding methods of creation and management of chalk grassland within the scheme.
- 1.2. With respect to the Habitats Regulations 2017, we do not see how consent can be given when the Appropriate Assessment is lacking important information. There is no certainty that the Scheme will not have an adverse effect. The RSPB stated in its end of Stone Curlew Life project conference that the Salisbury Plain SPA population is still in 'recovery phase'. We argue that it is therefore crucial that all aspects of the species ecology should be taken into account.
- 1.3. The Stone Curlew is protected by both Annex 1 of the Birds Directive and Schedule 1 of the Wildlife & Countryside Act. Normanton Down reserve plays host to two breeding pairs of Stone Curlew along with upwards of 100 individuals that gather there in a pre-migration roost; the largest of its kind in the south of England. The Appropriate Assessment does not mention any potential impacts of continual lights, noise and construction traffic upon the gathering activity of birds forming the autumn roost. Autumn roosts play an unknown role in survival of young as they gather with adults before migration, also they are vital in enabling assessment of annual breeding success of the SPA population.
- 1.4. The Appropriate Assessment does not mention any potential impacts of continual lights, noise and construction traffic upon chick rearing. Construction may render large areas that are currently used at night-time by adults foraging for their chicks, as unsuitable. Stone Curlew may forage up to 3km from the nest to find food and this activity mostly being undertaken at night. It is vital that comprehensive investigation be undertaken of effects that construction works may have on the birds' ecology.

- 1.5. There appears to have been a lack of consistency when assessing Stone Curlew breeding plots at Winterbourne Stoke and Normanton Down reserve. Whilst Normanton Down is not directly in the construction path, it is bounded by two byways being within 180m of a breeding plot at the closest point. We are concerned at the lack of baseline data collection on current byway use. Promotional documents produced by Highways England actively encourage visitors to “roam and explore” the southern half of the WHS without restriction, yet there are no plans to monitor this to assess any impacts.
- 1.6. The Habitats Regulation Assessment states that the ‘only’ in-combination effect of the Scheme is of recreational disturbance to Stone Curlew breeding plots at Normanton Down. The RSPB also considers it reasonable to expect an increase in foot traffic along the byways, whilst Local Plans, Wiltshire Core Strategy, the Army Basing Program and plans to increase Tourism will all contribute visitors to the area. With a significant concern regarding the unknown magnitude of increased recreation, plus an unknown level of negative impact upon Stone curlew, we question the developers’ evidence to “dispel all reasonable scientific doubt concerning the effects of the work”. The Scheme may be in reach of both the Habitats and Birds Directives.
- 1.7. We are unconvinced that the proposals to deal with Stone Curlews should they be attracted to bare ground created by construction works are adequate. We can find no recognition that breeding, in its entirety, can last up to 10 weeks. If the Scheme is promoting itself for biodiversity why has the minimum distance of 450m been chosen as an exclusion zone should any nests occur on the bare ground in the construction areas? Legislation states that works should take account of and fit around the requirements of Stone Curlew. As such we feel the exclusion zone should be at least 500m.
- 1.8. We believe the suggestion of new fencing for Normanton Down reserve is irrelevant to the impacts posed by the Scheme. Fencing does not keep out trespassers but the low level of byway use to date, coupled with the RSPBs decision to not promote the reserve to the public, has allowed Stone Curlews to successfully breed year on year. As access to the southern half of WHS is being promoted through the Scheme, we envisage more trespass as visitors seek the Normanton Barrows. New fencing will neither keep people out nor will it create a visual barrier to nesting Stone Curlew from users on the byways.
- 1.9. The current methods to create chalk grassland will provide perfect nesting habitat for Stone Curlew; we have raised concerns over the methods to dissuade Stone Curlew from nesting. Land laid bare if unworked for some time may attract breeding birds but from our experience crops will not grow thick enough or fast enough to dissuade breeding birds. Also. if Stone Curlews are displaced from their normal breeding plots this is likely to result in failed nesting attempts and birds being pushed into less suitable (unsafe) locations open to predation or other destruction.

- 1.10. The Great Bustard is noted of National Importance /High Value. It is also listed under Annex 1 therefore given additional protection under European law being a species for which an SPA can be designated. The UK population of Great Bustard is currently only found within the Salisbury Plain area, being the location of the Great Bustard Recovery Project. The Scheme is billed at delivering biodiversity benefits and yet it seems to continually overlook the Great Bustard despite it being a very high-profile species nationally and one that visitors to the area are keen to spot.
- 1.11. Great Bustard has been omitted from the summary of important biodiversity features within the study area, we can find no field study methods or dates of survey recorded. Normanton Down and the surrounding landscape south of the A303 is important to the reintroduction project. It frequently hosts visiting and occasional breeding Great Bustard. Baseline surveys are absent for this species, therefore vital information to aid assessment of likely impacts is missing.
- 1.12. We are extremely concerned at the creation and management proposals for chalk grassland within the Scheme. Creation should always use locally sourced seed where possible and establish the correct grassland type for the locality. Salisbury Plain is the obvious candidate for brush harvested seed which has been used successfully many times in the locality before, but this method and source of seed is excluded.
- 1.13. The proposed management tool for the new grasslands is mowing; this is the single most destructive method that could be deployed in terms of destruction of invertebrates. Many invertebrates would be attracted to the new grasslands, with very rare species attracted from Salisbury Plain and Normanton Down, but we fear the new grasslands would act as a sink to their detriment. We seek assurances that correct expertise in chalk grassland creation is sought and that local landowners with many years expertise such as ourselves are included.