

Comments on 8.30.7 Written Summary of oral submissions put at Biodiversity hearing on 14th June 2019

3. Effects on Stone curlew and adequacy of proposed mitigation measures.

3.4 Effectiveness of provision within the OEMP [APP-178, PW-BIO5] to prevent disturbance to nesting birds by construction activity. Response to the environment Agency's concern that PW-BIO5 measures are "unreliable".

Paragraph 5, Rachel Hosier comments on screening.

No mention is made of what the actual comments on screening were. To be a true representation of events we believe the following points should be included:

1 That removal of topsoil by preliminary works will in fact create ideal Stone curlew nesting habitat in the very area of the scheme, therefore it is not mitigation.

2 The OEMP states planting of quick growing crops as to provide screening. When considered in combination with the removal of topsoil by preliminary works, how will screening within the area of the scheme work? Quick growing crops will not grow in areas where topsoil has been removed.

The above points have been included in M & R Hosier's summary of the oral submissions yet they are omitted in the 8.30.7 written summary by the Applicant.

Final paragraph, the Applicant responded to further submissions from Mrs Hosier, Ms Williams on behalf of Mrs Hosier and Dr Fielding of Stonehenge Alliance in relation to adequacy of mitigation

The summary has omitted to state what the "further submissions" actually were. For the Applicants reply to be taken in context, the "further submissions" referred to need to be included:

1The OEMP lacks reference to the full fledging cycle of Stone curlew chicks. There are no references that the chicks are totally reliant upon their parents to provide them food for up to 10 weeks after they leave the nest. Therefore the safety of the foraging parents and their chicks should to be built into mitigation.

2 The OEMP lacks reference to mitigation for the autumn roost, which is integral to the entire breeding cycle of the juvenile Stone curlews.

3 The OEMP does not state whether the ECoW or suitable qualified person will actually have understanding and experience of working with Stone Curlews.

The above points have been included in M & R Hosier's summary of the oral submissions yet they are omitted in the 8.30.7 written summary by the Applicant.

Post meeting note:

The Applicants references that:

"details of physical screening could not be provided at this point" and "it would be incorrect to give the impression that screens are committed to in every case"

Due to the lack of inclusion of the above points, the OEMP PW-BIO5 and MW-BIO8 are considerably lacking in detail and do not provide adequate information to form assessment of whether provision or screening of construction works will be adequate for the Stone curlews.

4 Effects on Great Bustard

4.1 Current status of great bustard in the UK and Salisbury Plain area.

Paragraph 1, Ruth Manvell submissions

As with Agenda items 3, the Applicant's summary has omitted important points made by Mrs Manville. These comments concerned Great Bustard breeding numbers, the fact that birds have previously nested within the location of the proposed Scheme area, noting the disturbance due to dogs, humans and horses, concerns that fast growing crops for mitigation may actually attract Great Bustards, that disturbance will depend on time of year of construction works and the Impacts upon breeding disturbance.

Rachel Hosier highlighted recreational disturbance to Great Bustards from walkers with dogs.

Natural England stated that they did not have particular insight into the GB ecology.

RSPB stated that they had worked closely with GBG previously, but not in recent years.

4.2 Whether the proposed Development would prejudice the project to re-establish the great bustard as a resident breeding species in the area.

Second paragraph, Ruth Manvell of GBG

Missing comment on the contradiction that 40.3.25 states there are no Great Bustards in the scheme area, although Mrs Manvell had provided a map of breeding locations (this was confirmed by the Applicant's Ecologist) confirming breeding locations within the area. Mrs Manvell also stated that as far as she is aware, no work had been done by the Applicant to actually establish the presence of birds in the area.

Third paragraph, Rachel Hosier

Asked how appropriate mitigation could be put in place for Great Bustard when the Applicant has not carried out any surveys on the species and the species is being reintroduced, so few people have adequate knowledge.

6 Overall effects on the Scheme Biodiversity

6.1 Effectiveness of measures to secure long term management of calcareous grassland etc. to maximise gains in biodiversity.

Missing comments from:

Rachel Hosier

That she doesn't understand why the land between the current A303 and the deep portal has to be taken out of M & R Hosier ownership, when they could retain the land and enter into a management agreement with the Applicant for the area instead.

Asking what species are being targeted within this area and how a management plan can be put together for this area when the species being targeted have not been identified.

Trace Williams for M & R Hosier

That documents mention mowing as management for grassland, but mowing is highly destructive to invertebrate species and will act as a sink, destroying the very invertebrates the scheme is targeting.

We have included these comments in M & R Hosier summary of our oral submission, yet they are omitted in the 8.30.7 written summary by the Applicant.