

From: [REDACTED]
To: [A303 Stonehenge](#)
Subject: [REDACTED] comments on the re-determination of the application for the A303 Amesbury to Berwick Down project.
Date: 04 April 2022 23:08:46
Attachments: [REDACTED] [response to Bullet Point One - Alternatives 1.1.docx](#)
[REDACTED] [response to Bullet Point Four Environmental Information Review 1.4.docx](#)

Dear Sirs

Please find attached the following documents on behalf of Rachel Hosier, M & R Hosier and the Hosier family's response to the Secretary of State's request for comments from all Interested Parties in relation to the re-determination of the application for the A303 Amesbury to Berwick Down project.

- 1 Response to Bullet Point One – Alternatives Document reference – Redetermination 1.1
- 2 Response to Bullet Point Four – Environmental Information Review Document reference – Redetermination 1.4

Yours faithfully

Rachel Hosier

For M & R Hosier

REFERENCE NUMBER: A303-AFP001 Rachel Hosier, M & R Hosier and the Hosier family

RESPONSE TO BULLET POINT ONE – ALTERNATIVES

DOCUMENT REFERENCE - REDETERMINATION 1.1

Introduction

This response is on behalf of M & R Hosier and the Hosier family in relation to the Secretary of State's request for comments from all Interested Parties. This relates to the re-determination of the application for the A303 Amesbury to Berwick Down project.

M & R Hosier is an owner occupier family farming business located at Westfield Farm and Boreland Farm. Three quarters of the farm is within the WHS and situated at the western and central sections of the DCO proposed scheme. However, the surface route F010 would also have traversed the southern part of our farm.

M & R Hosier is a mixed arable and livestock farm which is complimented by a strong environmental focus within Natural England Entry Level and Higher Level Stewardship Agreement, being built upon to create Normanton Down Reserve, under a management agreement with RSPB to increase the breeding numbers of Stone Curlews, sustain the autumn roost as well as protecting above and below ground archaeology with biodiversity rich chalk grassland. As landowners we take our responsibility as custodians of the land seriously. We are not guardians under a recognised organisation but we take on board the lifetime role of custodians of the landscape to preserve the unique archaeology of the World Heritage Site (WHS) and wildlife within the area for future generations to enjoy.

3 Cut and Cover Tunnel Extension to WHS boundary

3.2.5 *“There is no evidence that the additional investment required to extend the tunnel length would deliver meaningful additional benefits to the WHS that would justify the additional costs.”*

The DCMS is responsible for ensuring the WHS is managed in accordance to the UNESCO inscription. The heritage organisations should be ensuring the DCMS is aware of its obligations and guide their decisions in the best interests of the WHS. However, on this occasion it seems as if the heritage organisations have prioritised their own assets above the WHS as a whole. Whilst we understand their fear that an alternative scheme could damage their property, we do not believe this a good enough reason to dismiss alternative routes that will cause damage to other parts of the WHS where it can be avoided, ie the western portal. We take our custodianship of the scheduled monuments within our care very seriously and need to ensure the heritage organisations do the same. Not all guardians are organisations.

The Government obviously put a high value on the WHS status at the time of inscription. However, it seems to have now devalued this asset for all the alternative options to be dismissed.

We disagree with the Applicants position that *“.. consenting of the Scheme would not justify inscription of the WHS on the List of World Heritage in Danger”* [1.5 Response to Bullet Point Five – Any Other Matters], and believe that following the Governments wilful dismissal of the UNESCO

feedback that the WHS status will be withdrawn if the current Scheme goes ahead. We would therefore urge the Government to rethink all the other alternative routes.

Heritage Issues

3.2.16 We agree that the extension would still impact on Attribute 2 (the physical remains of the Neolithic and Bronze Age ceremonial and funerary monuments and associated sites) at the western portal approaches. However, this option provides the true physical link between the Diamonds and Winterbourne Stoke barrow groups that the Applicant was selling at consultations.

Green bridge 4 and a small extension to the western portal does not reconnect the landscape, it only provides a single bridge. The cut and cover extension does connect the landscape.

UNESCO has already urged the Government to consider this option therefore the WHS status would be not be put at risk if this option was adopted.

Environmental Issues

3.2.17 and 3.3.5 The cut and cover extension removes the noise from the western portal and approach where the proposed Scheme has noted an increase in noise levels. By covering the carriageway we believe the Applicant will subsequently comply with the consultation commitment of reuniting the monuments back in a tranquil setting, allowing visitors to better understand the iconic landscape of the WHS. It would be good to hear the skylarks in the locality (as indicated in the consultation document) as well as see them.

This option also removes the air pollution from this area which will have benefits to flora, fauna and visitors to the area.

There will be greater biodiversity gain as there will be no risk of deer or badgers falling onto the carriageway or the deaths of birds of prey hunting roadkill from the road surface. Unlike humans, wildlife will cross roads wherever they approach them rather than looking for a safe bridge to cross!

The cut and cover option would also benefit the chalk grassland that is proposed at the western approach, making it easier for management by both livestock and machinery. Steep sided cuttings will have more HSE issues and be more expensive to manage once the scheme is in operation. Better management of the chalk grassland will bring more nectar rich flora with greater opportunities for the butterflies which are being targeted as part of the net biodiversity gain.

By having the road covered, there will be no night disturbance to the nearby Stone curlew population feeding within the area.

Dark night skies are becoming increasingly popular and World Heritage Sites are being awarded for this environmental benefit. The tunnel extension will bring dark skies back to our WHS.

We are aware that the biodiversity net gain laws do not currently apply to the current road scheme, however as the scheme has repeatedly promoted itself as bringing biodiversity net gain to the area. Therefore, we do not understand why Applicant refers to these major improvements as "*minor beneficial impacts*" especially as this is a WHS and not just any old major infrastructure development.

Groundwater

Our farm is totally reliant on boreholes for its water supply. We have no mains water. With concern over our continued water supply we engaged an independent hydrogeologist to assess the reports the Applicant produced as a result of their groundwater surveys. He concluded that there was a real risk to our water resource both in quality and supply.

Whilst the cut and cover extension would deliver ecology benefits, there would still be a risk to our farm water supply if this scheme were to be adopted. This is because the bored section of the tunnel would still have the potential to interfere with fissure flow within the landscape.

The Applicant bases all of its water assumptions on their water modelling programme. Our hydrogeologist has issues with the size of the assessment areas used for the water modelling. The grid used is so large that a small change in one area (ie in the location of the 2 or 3 fissures that supply our boreholes) will not show up as risks over the large grid squares. Our concern is that our water will be compromised and as a result of the way the Applicant has surveyed the area, they will blame climate change and leave us with no water supply. The Applicant has now started to monitor our private water supply. However, it has not carried out any surveys on the structure of our borehole to determine its character. The monitoring boreholes constructed by the Applicants consultants do have their strata and character assessed and recorded.

Our overall position on this route

Whilst we prefer this option to the DCO tunnel scheme, it still poses a threat to our farm water supply which would destroy our business if the Applicant did not agree to provide us with alternative water supply.

4 Bored Tunnel Extension to 600m beyond WHS boundary.

4.2.5 *“There is no evidence that the additional investment required to extend the tunnel length would deliver meaningful additional benefits to the WHS that would justify the additional costs.”*

This statement shows how little value the current government puts on the WHS status. Although, in 1985 the status seemed to be of value and funding was made available in securing the WHS accolade.

Heritage Issues

4.2.21 *“this option is assessed as slightly more beneficial than the Scheme.”*

We disagree with this statement and believe the Attribute 2 (the physical remains of the Neolithic and Bronze Age ceremonial and funerary monuments and associated sites) is of great importance at the western approach road and portal.

Currently only a small proportion of the topsoil from the approach road and deep cutting are to be evaluated under research projects. Therefore, the majority of the information stored in the top soil will be destroyed with no evaluation. This is below the standard of work that should be carried out

in a WHS, but most likely it is because 100% investigation of the topsoil is both expensive and time consuming. Once this topsoil is gone, all possibilities of research by future generations will be lost!

Indeed, National Trust insists that archaeologists assess every post hole that is dug on their property to check for any artefacts. We are therefore shocked that they do not insist the Applicant carries out 100% top soil analysis of the western approach road. Perhaps it is because it is not their land and so deemed of lesser importance? There appears to be dual standards.

As guardians of the western approach area we urge the Applicant to either carry out 100% soil evaluation or switch to an alternative scheme that does not impact on this area of the WHS. From the UNESCO feedback so far, the bored tunnel option would be acceptable within the WHS, therefore, the status would be retained. For this reason alone, the longer bored tunnel option is of greater benefit than the Scheme.

Attribute 5, retaining the landform in the western approach section, would be a vast improvement on green bridge 4 and the municipal stone work of the deep cutting that was depicted in the photo montages during the DCO Examination process.

Environmental Issues

4.2.22 *".. would offer overall minor beneficial impacts.."*

We disagree with this statement. At the western section, the Proposed Scheme currently destroys a hitherto unspoilt green field site and a Natural England environmental scheme with a wildflower margin. The Butterfly and Pollinator Survey Report (2020) Document reference Redetermination 2.8 already records the frequent abundance of features required for a number of the butterfly species that are targeted for the Scheme.

The improvements to the landscape and visual would deliver the quality of scheme that the Applicant has lead the general public to expect from the consultation documents. It removes the road, and allows more monuments to be reunited within the landscape. This in turn will allow visitors to walk over the tunnel rather than gaze onto the carriageway from Green Bridge 4 into the western portal.

The Green Bridge really is a poor excuse for reuniting the landscape in this location.

Noise

The Applicant has omitted to mention that the bored tunnel will remove the increased noise levels from the western approach and western portal that the current Scheme notes.

This will be of enormous benefit to both wildlife and visitors to the area.

Biodiversity

There will be great ecology benefits from removing the cutting. See 3.2.17 Environmental Issues in relation to the cut and cover extension to the WHS page 2 above.

Groundwater

Our farm is totally reliant on boreholes for its water supply. We have no mains water. Whilst the longer bored tunnel will deliver biodiversity benefits, there will still be a risk to our farm water supply if this option were to be adopted. There is still the risk for the bored tunnel to interfere with the fissure flow within the landscape. See 3.2.17 Environmental Issues in relation to the cut and cover extension to the WHS page 3 above for more detail.

We raised these water concerns at the Examination Hearings and have no reason to believe that our position has changed.

Our overall position on this route

The current DCO proposed Scheme appears to cherry pick the Stonehenge monument and given up with the rest of the WHS!

The bored tunnel completes and complements both the WHS and brings additional ecological benefits that we believe the Applicant has promoted throughout the consultation documents.

However, this option will still pose a risk to our farm water supply. For this reason, it is not our preferred route.

5 F010 Surface route option to the south

5.2.1 We are in the unique position that both F010 and the DCO proposed tunnel scheme have their footprints over our family farm.

Since work began on this current upgrade in 2016 we have been subjected to a barrage of ecology, geology, water, topography and noise surveys. However, none of these surveys have been in the location of F010. For this reason, we disagree that this route was ever taken to Step 4 – Assessing route options.

From the location of the surveys in 2016 it was plain to see that the only routes being rigorously considered were the twin bored tunnel options.

5.2.2 We struggle with the Applicants assessment of the *“high quality, tranquil landscape”* when no ecology surveys or noise surveys were ever carried out on the ground. Therefore, only desk top surveys would have been used and as we already know, some of the desktop survey data used was out of date.

Environmental Issues

We do not understand how the Applicant can claim F010 would have *“a greater overall environmental impact”* when there were no base line surveys for this route?

The current Scheme destroys a regularly used nesting site of the legally protected Stone curlew and puts two other regularly used stone curlew nesting areas within our Normanton Down Nature Reserve at risk by encouraging increased recreational activity post construction. The deep cutting

also destroys part of our existing floral enhanced grassland which according to the Applicant's surveys, is already providing frequent habitat for a number of chalk grassland indicator species.

We believe that had proper ecological surveys been carried out, F010 would have been a less ecological damaging option. F010 would give tranquillity to the area of the Western portal with complete removal of traffic therefore being more enticing to wildlife if the levels of general public are not too high.

WHS

F010 would leave the WHS intact and not damage the scheduled monuments on the farm that are under our family guardianship. There would be no risk of losing WHS status.

Whereas the current Scheme has already damaged scheduled monuments whilst carrying out their surveys, left bagged artefacts on site, finally leaving the area without bothering to backfill archaeological trenches properly!

No archaeological surveys were ever carried out in respect of F010 prior to the route being dismissed.

We would like to see the heritage organisations (that are legally responsible to the DCMS and UNESCO for protecting the WHS) fighting for the whole of the WHS rather than just the areas that they own and make money from.

Groundwater

Our farm is totally reliant on boreholes for its water supply. We have no mains water. With concern over our continued water supply we engaged an independent hydrogeologist to assess the reports that the Applicant produced following their groundwater surveys. He concluded that there was a real risk to our water resource both in quality and supply. He also highlighted that he had never seen such poor quality reports as those posted for the DCO and struggled to understand why the Applicant had carried out some surveys whilst dismissing others.

Although no groundwater surveys were directly carried out in respect of F010, we believe that as it is a surface route, there would be less risk to our water supply. We are one of four farms over the Scheme footprint that are reliant on boreholes for water.

The Applicant bases all of its water assumptions on their water modelling programme. Our hydrogeologist has issues with the size of the assessment areas used for the water modelling. The grid used is so large that a small change in one area (ie in the location of the 2 or 3 fissures that supply our boreholes) will not show up as risks over the large grid squares. Our concern is that our water will be compromised and as a result of the way the Applicant has surveyed the area, they will blame climate change and leave us with no water supply. The Applicant has now started to monitor our private water supply. However, it has not carried out any surveys on the structure of our borehole to determine its character. The monitoring boreholes constructed by the Applicants consultants do have their strata and character assessed and recorded.

There is no evidence in the updated reports and surveys that indicate a revision of the survey grid being used. Therefore we have no confidence in our long-term water supply with the current proposed Scheme. However, we would suggest F010 would have a lesser impact on our farming business.

Public engagement

Although the F010 route has a longer footprint in the landscape, we do not see this as a reason why current levels of rat running through local communities will increase or be maintained. There will always be a high flow of local traffic within the area due to the new housing being built at St Peters Place by the A360 and the two housing developments adjacent to the A345 either side of Highpost. Commutes between these two areas will always use local roads regardless of where the new A303 is placed.

F010 would remove the risk of the western portal and green bridge 4 becoming new suicide locations. This ritual and ceremonial landscape that would undoubtedly attract this darker side of human nature.

Our overall position

F010 will remove noise levels within the barrow cemeteries at the western end of the Scheme where the Applicant is seeking to encourage general public into the tranquil landscape. With no bridges or deep cuttings, the suicide risk in the ritual Stonehenge landscape is also removed.

We believe F010 would have less impact on the species rich ecology that already exists on our farm, less impact on our groundwater supply and would ensure the WHS and our cultural heritage remains intact.

Surveys were only ever carried out in relation to the tunnel options. Therefore, we would suggest that F010 was never properly considered as a viable option.

Our conclusion

Famous quotes from archaeologists throughout the ages are written on the walls of the exhibition hall at the Stonehenge visitors centre

This one by Jacquetta Hawkes is thought provoking. *“Every age has the Stonehenge it deserves or desires.”*

Have we reduced Stonehenge into a money making attraction and commodity instead of raising it to a World Heritage Standard? Is the money to be made from a road and this single monument more important than preserving the WHS store cupboard of our cultural heritage for future generations? We sincerely hope that we have the Stonehenge that the WHS deserves and not the DCO proposed Scheme.

Also it must not be forgotten that when talking about the WHS we are in fact talking about two sites, Stonehenge and Avebury. With this in mind, the removal of the WHS status will not only impact on

Stonehenge; Avebury will also be stripped of its title when it has not carried out any activities that UNESCO are at conflict with.

If the government wishes to upgrade the A303 on a budget and within the WHS then it is only right that it voluntarily gives up its WHS status. If there is no WHS status then there is no need to adhere to the high standards of UNESCO. Therefore, the A303 could be upgraded on line with additional carriageways. Although this may appear damaging it is no more so than the current Scheme as proposed at the DCO.

A surface road would not require vast quantities of topsoil from being removed from the area thus removing valuable archaeological resources for future investigation.

A surface road can be easily removed whereas a deep cutting cannot be filled in at a later date.

A surface road will not cause untold damage to the groundwater and compromise the four farming businesses that rely on it.

A surface road will not cause damage to the already species rich biodiversity that already exists along its route.

A surface route will treat all of the heritage monuments equally. So heritage organisations will absorb the impact as well as all other landowners within the footprint.

A surface route will have much lower construction costs.

We believe that the surface route is the best option whether it be F010 or duelling on line in the current location.

REFERENCE NUMBER: A303 –AFP001 Rachel Hosier and M & R Hosier and the Hosier family.

RESPONSE TO BULLET POINT FOUR – ENVIRONMENTAL INFORMATION REVIEW

DOCUMENT REFERENCE - REDETERMINATION 1.4

Introduction

This response is on behalf of M & R Hosier and the Hosier family in relation to the Secretary of State's request for comments from all Interested Parties. This relates to the re-determination of the application for the A303 Amesbury to Berwick Down project.

M & R Hosier is a family owner/occupier farming business, three quarters of the land being within the southern part of the World Heritage Site (WHS) and situated at the western and central part of the DCO proposed scheme.

M & R Hosier is a mixed arable and livestock farm complimented by a strong environmental focus with Natural England Entry Level and Higher Level Stewardship Agreements. Normanton Down Reserve was created under a management agreement with RSPB and has increased the breeding numbers of Stone curlews and hosts an autumn roost. In line with the WHS management plan objectives, the species rich chalk grassland provides protection to the archaeology above and below ground whilst enhancing the biodiversity within the area.

As landowners we take our responsibility as custodians of the land seriously and although we do not possess the powers of recognised heritage organisations, we take our role as guardians seriously, ensuring the monuments in our care are protected for future generations.

5 Biodiversity

LA 108 Biodiversity

Design Manual for Roads and Bridges

5.2.2 We note that the Design Manual for Roads and Bridges LA 108 Biodiversity is to be reviewed in 2022. We have seen a marked decline in the quality of surveys that have taken place over the duration of this Scheme.

5.2.10 We note *“LA 108 requires that the baseline information provides a report of the baseline at the time of survey and future baseline at the time of the project proceeding”*.

Since the 2017 ecological surveys, the surveys have been minimal and less thorough. Sometimes taking place when survey conditions are questionable with a lack of time for rescheduling. This gives the impression that the surveys are box ticking. However, poor results for base line surveys will show larger benefits in post development surveys. Or perhaps as so many infrastructure projects taking place meaning ecology survey staff are thin on the ground.

5.2.10 also continues *“no significant changes identified during updating surveys in 2019 and 2021 that would alter the future construction baseline or change the prediction of future baseline..”*

Contrary to this statement, our farming enterprises have changed since 2021. Our independent assessment of the hydrogeology of the Scheme has shown there is a real threat to our water supply, therefore we have reluctantly shut down the pig enterprise in order to prevent welfare issues.

We would suggest that with no pigs on the landscape there will be a marked reduction in invertebrate food in the surrounding area. This in turn has the potential for reducing the feeding opportunities for the bats foraging south of the A303. Perhaps this change is not significant enough, although we will never know as no further bat surveys have taken place in this location since 2018.

5.3 Environmental Information

Baseline

5.3.1 *“Since 2018, various ecological surveys have been undertaken to inform the mitigation measures, protected species licensing requirements and to provide a baseline for post-construction monitoring surveys...”*

See our response to 5.2.10 above. As a result of our independent hydrogeological analysis indicating a distinct risk on our groundwater, we have reluctantly closed down the pig enterprise that used to occupy the area of the western portal and western approach road.

Our experience of surveys relating to Environmental Information – Baseline

Ecological surveys since 2017 have been minimal and seemingly less thorough.

2017 ecological surveys

We were inundated with ecological surveys during 2017. However, none of these were in the location of F010 therefore we find it hard to believe that this route was ever under consideration as a possible route option.

Survey requests for the tunnel schemes and their surrounding area were :

4 breeding bird surveys carried out over the breeding season April to July 2017.

An arable weed survey in June 2017.

An invertebrate survey, June to July 2017.

Monthly deployment of bat detectors from May to October 2016 and April to October 2017. As well as crossing surveys, transect surveys, bat trapping and radio tracking, tree assessments both on ground and aerial.

Badger surveys between Jan to March 2017

Hazel Dormouse surveys April to July 2017.

2018 Ecology surveys

The bat surveys transect and crossing surveys were comprehensive, undertaking six surveys from June through to the end of August. Their route took in the area around Normanton Gorse and Diamonds wood as well as the earthwork leading up to longbarrow roundabout.

No surveys were ever carried out within the location of the F010 route.

2019 ecological surveys

Invasive/non invasive species survey. Although this single visit was targeted at the whole of the Scheme footprint, this was reduced to just walking around the edge of the arable fields. This pleased us as we sustained no crop damage. However, we wonder how thorough the survey was (although our agronomist has not found any invasive species during crop walking).

A voluntary burrowing mammal walkover survey. We opted out of this survey as we did not want to be associated with badger monitoring. It is a sensitive subject with the general public.

Landscape scale bat surveys. These were reduced down to two visits and were only carried out from byway 12 so a fraction of the area surveyed in 2017.

We do not understand why at this time, no surveys were carried out in the location of the western approach road. On this occasion, the areas where the road will remain exposed or close to the Scheme boundary have been omitted. Whilst it is cost effective to only survey the areas the Applicant deemed important, it is not a true baseline for the surrounding area and a true reflection of the bat use within the scheme footprint?

We assumed the whole reason for carrying out crossing and transect surveys is to establish landscape trends rather than pre-decide what the trends will be, and then only carry out surveys in these areas to back up what you think is going to happen?

2020 ecology surveys

We were asked for the following surveys:

Bat roost- ground based, aerial tree climbing and emergence/re-entry surveys

Barn owl - ground based surveys 20 m from scheme boundary

Badger surveys within 50 m of the scheme boundary

However, we do not know whether any of the above surveys ever actually took place as we were never contacted with any dates or times. We were further confused, as we were informed that the surveys could take place from field margins rather than actually entering the Scheme footprint. Perhaps Covid overtook events?

2020 Butterfly survey

In late summer, a butterfly survey was requested, walking along our environmental scheme floral margin. This was to be carried out over 4 visits from the middle of July to the end of August.

This surprised us, as at Normanton Down, (our main ecology focus) butterfly surveys are carried out from April to September to ensure all the butterfly species in the Reserve are represented. In addition to this, the timings of the surveys are dictated by the weather and not by a pre-arranged timetable.

By effectively only surveying for one month, the results would potentially have picked up only a fraction of the butterflies that would have been present through the season. Furthermore, one of the timetabled survey dates went ahead when the weather app predicted strong wind gusts (not conducive to butterflies). When questioning the suitability of carrying out a butterfly survey in such windy conditions one was lead to believe that there was no time left to reschedule and that the weather was not as bad as they expected! It is interesting to note within Butterfly and Pollinator Survey Report (2020) Document reference 2.8 that the wind speed was Beaufort scale 4 on these survey days, being just below the acceptable wind speed for surveying.

Our personal interpretation

The 2020 proposed surveys bore no relation to the raft of comprehensive surveys that were carried out in 2017/2018.

If the bat, owl and badger surveys ever went ahead they were only carried out by walking down a field margin and certainly would not be representative of the species present.

The butterfly survey only covered one month near the end of the season. Therefore, we would question its suitability to be used for base line data.

However, being sceptical, having low numbers of data as a baseline survey gives a pretty high chance of producing high figures if good standards of surveys are carried out on the area once the Scheme is in operation.

Habitats

5.3.6 *"...no obvious changes to the habitat present within the boundaries of the Scheme were noted.."*

This statement is incorrect.

The pig enterprise (which was on our farm) was not moved *"on a standard rotational basis"* It was forcibly moved from its *"standard rotational basis"* as a result of the archaeological surveys that took place within the pig area! Added to this, we were harassed by the Applicants consultants who had no appreciation of the welfare issues the breeding sows were put through by moving them from their home onto the nearest available field (which just happened to be a winter wheat field).

A pig enterprise use a lot of water, so we engaged an independent hydrogeologist to assess the hydrogeology reports produced for the Scheme. He concluded that there was a high probability that our groundwater supply (we have no mains water on the farm) would be compromised for quality and supply if the Scheme went ahead. With the Applicant refusing to safeguard our water supply we believe we have been forced out of pig production. The pig enterprise on the farm has ceased.

The pig enterprise attracted a good source of invertebrate life. Following the removal of the pigs from the landscape we suggest that there will be a marked decrease in the bats and birds that foraged in this area. This is one of a number of biodiversity net reductions as a result of the Scheme.

Bats

Bat landscape scale surveys

5.3.9 The 2018 bat surveys were far more comprehensive undertaking 6 surveys from June through to the end of August. Their route took in the area around Normanton Gorse and Diamonds wood as well as the earthwork leading up to longbarrow roundabout so were representative of the western approach road bat activity.

5.3.10 In 2019 only two surveys were done and this was only from a section of byway 12 being a fraction of the area first surveyed. No surveys were carried out in the location of the western approach road, so this area of the Scheme was unrecorded giving incomplete base line data for future Scheme assessments. There is the possibility that in an attempt to save money, surveys were only carried out in areas where the Applicant “thought” it would be worthwhile surveying to back up preconceived ideas.

5.3.11 We are not sure that any bat surveys were carried out on our farm in 2020 as we were never informed of any survey dates. Added to this, the planned surveys were only being carried out from along the field margins and not along the previously used transects. It will be interesting to see if the quality of surveys to be carried out in 2022 improves.

Badger

5.3.23 The 2019 badger survey was voluntary and we did not take part in this.

We do not know whether the 2020 proposed badger surveys ever took place as we were never informed of any survey dates. Although from the correspondence we had from the Applicant they were only planned 50 m from the scheme footprint. Therefore, a significant number of badger activity would have been overlooked.

We will watch with interest to see how the 2022 surveys are carried out.

Stone curlew

5.3.27 *“In addition where suitable breeding habitat presents itself, breeding attempts have been recorded, this indicates that suitable breeding resources might be a limiting factor on breeding attempts.”*

This statement is simplistic and shows a lack of understanding of the Stone curlew species by the Applicants consultants. However, this is not surprising, as there are not many ecologists that have a deep understanding of the Stone curlew species and unless the consultants have updated their ecologists, they were lacking in experience during 2018. (This was highlighted by the need to call in the RSPB Stone curlew monitoring team to locate the pair of birds that were nesting on the archaeological site). We are by no means experts on the Stone curlews, although having monitored

and worked with the birds for over 60 years we have a better understanding of the species than most people.

Contrary to Sift documents, it is already known that breeding locations chosen as “suitable” by humans are not always “suitable” to the Stone curlews themselves. Farmers in the surrounding area will tell you, there are a number of vacant “suitable” nesting plots already available within the landscape. This indicates that there are far more subtle nuances to plot sites than ecologists realise and the numbers of breeding sites in the location are not a limiting factor.

First time breeders will likely still have nesting attempts on unsuitable locations. It is largely due to inexperience rather than the lack of nesting sites.

5.3.28 *“It was an opportunistic event on land which was temporarily suitable but has since changed to arable management unsuitable for breeding Stone curlew”*

Stone curlews do also breed in “arable management”. We have experience of juvenile pairs breeding on the bare field margins of arable fields. On occasions the pair have been successful and we have seen chicks but at other times they have been unsuccessful.

2018

The Stone curlew species are both site and pair faithful, which is why a lack of disturbance during nesting time is critical. Juvenile birds return to the surrounding areas where they hatched, although they are often pushed away from the prime breeding sites by the dominant breeding pairs. With the inexperience of youth, they can choose unsuitable sites for their maiden breeding attempts. Sadly, these breeding attempts often fail due to the unsuitability of these marginalised areas. This is exactly what happened during the 2018 archaeological investigations, when a first time breeding pair of Stone curlews put down a nest over the bank holiday period when no archaeological work was taking place on site. We had warned the Applicant in advance that this would probably happen although they did not believe it would!

The number of additional breeding sites within the landscape will not make any difference to the number of Stone curlews that will nest in the location. It is likely that first time breeders will still have nesting attempts on unsuitable locations. It is due to inexperience rather than the lack of nesting sites.

5.3.29 We would like to see “disturbance” added to the list of fluctuation of breeding attempts. Disturbance especially by dogs is of primary concern which is why we have issues with the Scheme encouraging increasing numbers of general public into areas where Stone curlews are known to be breeding successfully.

We would also reiterate that there are already vacant “*suitable breeding resources*” available within the surrounding area. Farmers will tell you that there are plots prepared to Stone curlew standards that do not have breeding pairs. What the ecologists deem “suitable” breeding plots are not always deemed suitable to the birds themselves.

There is no certainty that any of the replacement plot provided as mitigation as part of the Scheme will be adopted by the pair that are being displaced. It is likely they will continue to try and nest in their usual site. The Stone curlew species are extremely choosy.

Our personal comments

The report skates over the recreational disturbance to Normanton Reserve, created by the Applicant advertising the area for roaming and exploring once the tunnel is in place. Then omitting to mention the roaming will be confined to byways. This has put immense pressure on the Stone curlews that breed in the surrounding area.

In addition, our independent ecologist believes that the years of construction disturbance will also pose a major problem to the Stone curlews. As previously stated at the Examination and within our earlier reports we do not believe the measures in the OEMP in PW-BIO5 are adequate to mitigate disturbance to the birds during construction.

We also have concerns that the ecologists on the preliminary works and the main works team will not have the depth of knowledge to ensure the best interests of the birds are met.

We remain disappointed that the ecology organisations have not been more proactive in defence of the Stone curlew species. But who can blame them when they will all be receiving extra biodiversity assets of chalk grassland, stone curlew plots and all manner of other funding for other projects. It is just sad that the Stone curlew species are the ones that pay the real price of the Scheme, a net biodiversity loss on site.

Great Bustards

5.3.30 We also have experience of Great Bustards visiting and nesting on our farm. This species has similar requirements as the Stone Curlew, with disturbance being a major problem for the birds.

Indeed the Great Bustard Group (GBG) have informed us there have been nesting sites close to the Scheme boundary.

As a result of the Scheme, the new byways which will be put into the landscape will be an added pressure to the Great Bustards. We would hope that the general public will stick to designated footpaths and not roam and explore as they have been encouraged to do within the consultation booklets and literature. Stock netting on footpaths and byways will help reduce dog attacks on wild birds but will not prevent it.

The re-determination documents have made no further measures for the protection of the Great Bustards during the construction of the Scheme. Similar to the Stone curlews, the Preliminary and Main Works contractors "should" have ecologists with Great Bustard experience on site. However, as there are only a handful of ecologists with this specialist knowledge this would require a member of the GBG to be on site, which given the small size of their organisation will mean they will need to employ an extra person on their staff.

Invertebrates – Butterfly and Pollinators

3.4.42

“The creation of extensive calcareous grassland as part of the Scheme is expected to both provide habitat for butterflies and pollinators and improve connectivity between suitable sites within the predominantly arable landscape.”

We do not agree with statement in relation to the central section and location of the western approach road.

The Applicant seems to have used old desktop surveys for some of their land classifications. Areas on our farm that have been permanent grassland since 2002 have been incorrectly classified as “Other non-grassland habitats”. In addition there are four other grassland areas under Natural England environmental schemes (which belong to neighbouring farmers) that have also been wrongly noted as “other non-grassland habitats”. We agree that the Scheme will add more grassland within this area. However, the real land use of this area is not the barren arable land that the Applicant suggests it is.

“Whilst the 2020 surveys provide additional details about these invertebrates it does not change the assessment in the 2018 ES.”

The 2020 butterfly surveys were the only butterfly surveys that have taken place. For the Environmental Statement 2018, an invertebrate study with pit fall traps (these won't collect many butterflies) took place in June/July 2017. This consisted of a visit to put out the pitfall traps followed by another to collect the trapped invertebrates a month later. The odd butterfly passing by would have been recorded, however, it was not the main focus or monitored using Wider Countryside Butterfly Survey or Pollinator Monitoring Scheme standards.

5.3.43

“The habitats covered by the transects were either arable field margins or arable reversion.”

The above statement is misleading. Some of the arable reversion areas have been in place since 2002, so in line with the Rural Land Register would now be classified as permanent pasture. It is not the barren landscape that the Applicant paints it to be.

“A wide range of butterfly species were recorded across the four transects and four survey visits.”

2020 Butterfly survey

In late summer, a butterfly survey was requested, walking along our environmental scheme floral margin. This was to be carried out over 4 visits from the middle of July to the end of August.

This surprised us, as Normanton Down, our main ecology focus, carries out butterfly surveys from April to September to ensure all the butterfly species in the Reserve are represented. In addition to this, the timings of the surveys are dictated by the weather and not by a pre-arranged timetable.

By effectively only surveying for one month, the results would potentially have only picked up a small percentage of the butterflies that would have been present throughout the whole season. Furthermore, one of the timetabled survey dates went ahead when the weather app predicted strong wind gusts (not conducive to butterflies). When questioning the suitability of carrying out a butterfly survey in such windy conditions one was led to believe that there was no time left to reschedule and that the weather was not as bad as they expected! Having read the Butterfly and

Pollinator Survey Report (2020) Document reference 2.8 we see that a wind speed of Beaufort 4 was recorded for these surveys, being the limit at which surveys take place.

Butterfly and Pollinator Survey Report (2020) Document reference: Redetermination 2.8, 2 Methodology, 2.1.2. Under methods used it references Natural England's Porton to Plain project. Along with a number of other farmers, we have issues with this report as similar to the Applicants reports, it has used old out of date desk top data to draw inaccurate conclusions.

Added to this, Natural England only cherry picked areas to survey for butterflies, instead relying heavily on information provided by National Trust on habitat. The lack of representative surveys has resulted in a report which is biased towards Natural England and National Trust locations. Other key habitats have been overlooked.

The Applicant is targeting butterflies and pollinators as their biodiversity net gain of choice. Most likely this choice is because butterflies do not conflict with encouraging the general public into the area.

5.3.44 *"...a total of 1347 individual butterflies were recorded which comprised of 23 different butterfly species."*

If the surveys had been carried out over the whole season from April to September, the individual butterfly count would have been larger and the number of different species would have been higher. Therefore, the 2020 surveys did not provide a representative base line data for the post scheme surveys to be assessed against.

Butterfly and Pollinator Survey Report (2020) Document reference: Redetermination 2.8, 2.5 Limitations 2.51 does highlight the shortcomings in the limited number of butterfly surveys in 2020 only carrying out surveys over the period of a month rather than April to September. Also noting some strong wind speeds.

Butterfly and Pollinator Survey Report (2020) Document reference: Redetermination 2.8, 2.5.2 also states *"many of the flower species had gone to seed, giving a relative lack of available flowers to survey."* So the flower insect time counts had to use alternative flowers for their survey.

Butterfly and Pollinator Survey Report (2020) Document reference: Redetermination 2.8, 4.3 Pollinators, 4.3.1 *"a range of pollinator species were recordedincluding beetles, butterflies, moths and other flies, small insects, hoverflies, solitary bees, wasps, honeybees and bumblebees."*

The invertebrate survey of 2017 was a far more comprehensive survey in terms of the diversity of species of pollinators. It identified the various *"beetles"*, *"other flies and small insects"* to check whether they were red listed species. Just because the invertebrates are not as pretty as the butterflies it does not mean they are less important. Their food plants requirements are just as important as the butterflies.

We stand by our assessment that the 2020 butterfly survey did not provide a representative base line data for the post scheme surveys to be assessed against.

It will be interesting to see whether the 2022 butterfly survey will cover the whole survey season or whether it will be compressed into four visits in close succession.

Future Baseline

5.3.55 *“Pre-construction updating surveys will be carried out to inform mitigation during the construction phase, protected species licensing and monitoring as stated in the 2018 ES.”*

Will the Applicant only be doing pre-construction surveys in relation to the protected species? Will all of the baseline ecological surveys be repeated to a more representative standard?

Further Surveys

5.3.56 We would urge the Applicant for a reassessment of the impact of construction on the Normanton Down Stone curlews and Great Bustards taking into account the habitat range of the individual groups and associated feeding grounds.

Rather than the Applicant relying on the additional Stone curlew plots to be created within the landscape, we would like to see the RSPB Stone curlew team draw up a list with the various impact of the construction activities upon the local Stone curlew population. Whilst Natural England is responsible to ensure habitat regulations are met, it is the RSPB stone curlew monitoring team that have the greatest knowledge of the area and the local population.

We would hope that a similar exercise will be carried out with the Great Bustard Group.

5.3.57 Will the 2022 ecology surveys be carried out by walking around the field margins as was indicated in the 2020 surveys?

We do not know how far the ecological zone of influence stretches. Is it just around the Scheme boundary or does it stretch in the wider landscape which the species would also be using?

Will the butterfly surveys be carried out over a whole season or just crammed into a month as per the 2020 surveys?

Impacts

Construction

5.3.59 c) Disturbance See 5.3.56 above. We have great concern that the 5 years of construction activity (light, noise, and human activity) will put the Normanton Down Stone curlew at risk and urge the Applicant to ensure the pre and main works contractors work closely with the RSPB Stone curlew monitoring team. Previous Ecology of Works team, whilst very enthusiastic, did not possess experience and deep understanding of this important species.

Operational

5.3.61 d) Disturbance

“An indirect impact resulting from a change in normal conditions (human activity) that would result in the important biodiversity feature changing its typical behaviour, such as changes in roosting behaviour”

This statement is misleading. With the increase in human activity, it is not just the *roosting* behaviour of the Stone curlews that is at risk. Of greater importance, the Applicant has already identified the potential impact on the **breeding** sites of the Normanton Down Reserve Stone curlew population once the Scheme is in operation. This impact has been further intensified by the Applicant leading the public to believe they can explore the area south of the A303 without clarifying that the exploring will only be via byways. Three quarters of the land south of the A303 is under private ownership and not available for roaming.

During the Pandemic we experienced a marked increase in the levels of people trespassing over the farm. No notice was taken of the signs highlighting private areas, even signs indicating the location of sensitive ecological areas for the protection of wildlife were ignored. In some locations, there are 4 signs noting the area is not for general access, however people take no notice! This calls into question the Applicants assessment of the impact of general public in sensitive ecological areas and indicates a need for a review of their policy. The Applicant is placing weight on suitable signage around the WHS, when it is apparent that signage is wilfully ignored. What other physical measures do they intend to put in place to protect the ecologically sensitive areas?

Added to this, since the lockdowns have ceased, we have noticed a dramatic increase in the numbers of car and touring vans etc parked up on the section of byway 12 north of the A303. Pre pandemic, there would occasionally be 6 vans or cars. However, it is not uncommon to see 20 plus vehicles parked up in this area from a Thursday to the following Monday. Are these visitors seeking an alternative experience from the monument? With the ever spiralling cost of living, is the £24/head entry price for Stonehenge really value for money? For their ticket price they get free parking (!), entry to the visitor centre exhibitions, and the opportunity to walk around the cordoned off monument with an audio guide informing them of how the monument may have been built and the opportunity to walk through the NT land that surrounds the monument.

In 2019 there were 1.6 million visitors to Stonehenge. As a consequence of the pandemic, 2020 saw a reduction to 315,000 people with a small rise to 334,000 in 2021. We would suggest that rather than pay exorbitant ticket prices, people are choosing a different Stonehenge experience with no ticket charge. Visitor number to other attractions in the area seem to have bounced back to higher levels than English Heritage's Stonehenge ticket sales. Therefore, we would suggest that the Applicant reviews the visitor numbers and use of the wider landscape, as it seems there will be more wandering in the sensitive areas of the WHS with the ever increasing antisocial behaviours of littering, fire lighting and stealing firewood. How will these behaviours be counteracted?

5.3.65 *“The increase from four to five breeding plots in total is not due to any increase in legal requirement for mitigation and does not change the outcome of the ecological assessment or the Habitat Regulations Assessment.”*

We were disappointed that although it was the Normanton Down Stone curlew breeding pairs that were identified as under potential threat from increased recreational disturbance, we were not contacted in respect of a replacement plot for our birds! This also surprised the RSPB with whom we have a management agreement for increasing the breeding numbers of Stone curlew on Normanton Down. Therefore, we asked the Applicant to consider other areas close to the existing plot as suitable sites.

We were disappointed to learn that mitigation plots did not have to be in place during the 5 years of construction. This would have the added benefit of mitigating against potential construction disturbance as well as post construction

Our overall comments

On any other infrastructure scheme (potentially F010), the existing on-site presence of Stone curlews and Great Bustards would be noted as a species rich ecology and be protected.

However, the proposed Scheme has a clash between ecology (net biodiversity gain), and encouraging the general public out into the landscape. Whereas the visitors want to see wildlife, the wildlife don't want to see the public and will actively retreat to more tranquil areas.

In the central and western sections of the Scheme, the Applicant is concentrating on chalk grassland and butterflies, both of which are not sensitive to people wandering around the area. The Applicant also notes badgers, pole cats, bats and deer amongst the net biodiversity gain although there are already significant populations of these on both sides of the road, so we do not see this as a new species gain.

There already exists an east west connectivity for butterflies within the landscape and butterfly populations will only expand over an area if there is new species nearby as they are unable to fly over long distances.

We urge the Applicant to carry out the future surveys to a higher standard and not refer back to out of date desk top data (which would only be relevant at the time of survey but not for the Scheme). Whilst poor base line surveys may make the Applicants biodiversity net gain appear better, they just perpetuates inaccurate data when used by other organisations or future schemes.

We also urge the Applicant to do more for the Stone curlew and Great Bustard species, being the existing species rich biodiversity already in the landscape.

In our opinion, the Scheme endangers existing species rich ecology replacing it with other species that are tolerant to the presence of the general public in the landscape. When will human beings stop pushing wildlife out of their habitat? Where are the safe areas for the wildlife?