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Freepost A303 STONEHENGE CONSULTATION

24th February 2017

Dear Sir / Madam

A303 Stonehenge, Amesbury to Berwick Down Public Consultation

The RSPB is committed to working with Highways England to find an acceptable solution, which allows improvements to the A303 while safeguarding the wildlife interest of the World Heritage Site (WHS), and the stone-curlew as a designated feature of Salisbury Plain Special Protection Area (the SPA).

However, because the proposals will directly impact a number of stone-curlew nesting territories, and have potentially adverse effects on the Salisbury Plain stone-curlew meta population (the stone-curlew population that exists on, between and around Salisbury Plain and Porton Down) and the SPA, the RSPB **objects** to the scheme as published. Our reasons are set out in the attached Annex. In summary, they are as follows:

- The location of the western portal together with either of the two proposed Winterbourne Stoke bypass options have the potential to impact on at least five stone-curlew breeding sites.
- The removal of the existing section of the A303 between The Avenue and Longbarrow roundabout, whilst highly desirable in terms of reducing impacts on Stonehenge and potential for chalk grassland re-creation, will increase access and

therefore recreational disturbance in the proximity of the RSPB's Normanton Down nature reserve, in likelihood rendering it less favourable for stone-curlew.

- The combination of the above impacts is likely to have an adverse effect on more than 1% of the UK stone-curlew population and the Salisbury Plain meta population, a component of which, the Salisbury Plain SPA, is classified.

We are concerned that no information has been made available relating to the environmental impact of the proposals. The RSPB is keen to maintain a constructive dialogue with Highways England in order to enable a full assessment of the proposals, and minimise the environmental impact, using the best available science.

We reserve the right to add to or amend our position, and look forward to being consulted as work on the full assessment of the impacts progresses, including consideration of appropriate avoidance and mitigation measures for predicted impacts on the stone-curlew population, and opportunities for significant chalk grassland enhancement.

Yours faithfully,

Phil Shel Drake

Annex: Response by the RSPB to the A303 Stonehenge, Amesbury to Berwick Down Public Consultation

Introduction

The RSPB was set up in 1889. It is a registered charity incorporated by Royal Charter and is Europe's largest wildlife conservation organisation, with a membership of over 1 million. The principal objective of the RSPB is the conservation of wild birds and their habitats. A key means by which the RSPB achieves its principal objective is by acquiring land and managing its nature reserves.

The RSPB also attaches great importance to all international, EU and national law, policy and guidance that assist in the attainment of this objective. The RSPB campaigns throughout the UK and in international fora for the development and effective delivery of such law and policy. In doing so, it also plays an active role in the domestic processes by which development plans and proposals are scrutinised and considered, offering ornithological and other wider environmental expertise, in particular in the public inquiry context.

The WHS at Stonehenge represents one of the most important landscapes in the country, being rich in both cultural and natural history. Within the WHS, the RSPB manages a nature reserve at Normanton Down as denoted on the map (Map 1) included in the consultation documentation. Successive WHS Management Plans have promoted the reversion of arable land to species rich chalk grassland, typical of the downland of the greater Salisbury Plain plateau. The RSPB has exemplified this at Normanton Down where an area of 92ha, including some of the Normanton Down Barrow Group, has been restored and is being managed for its chalk grassland flora and the rare stone-curlew.

Whilst our immediate concerns relate to the potential negative impacts on our Normanton Down reserve and the rare stone-curlew, we recognise that the scheme presents an unparalleled opportunity to enhance the WHS for both people and wildlife. The WHS sits at the heart of the RSPB's Chalk Country *Futurescape* vision¹ focused on the restoration of Wiltshire's downland heritage landscape. The RSPB currently manages four nature reserves totalling in excess of 700ha across south Wiltshire with this headline objective.

¹ The Wiltshire Chalk Country vision links two Areas of Outstanding Natural Beauty, the North Wessex Downs and the Cranborne Chase and West Wiltshire Downs, with the Stonehenge World Heritage Site at its heart. It includes the SSSI and SAC designated grasslands on Salisbury Plain and Porton Down. It supports a quarter of the UK's breeding stone-curlews and is also an area to target improving conditions for other farmland birds; it is a hotspot for lapwing, grey partridge and corn bunting, all of which are priority species for agri-environment schemes.

The stone-curlew *Burhinus oedicanus* is a rare breeding species in Britain. The species is restricted in range to eastern England and central southern England around Salisbury Plain and Porton Down, all of which have designations as SPA in recognition of the importance of their populations of stone-curlews. Stone-curlews are listed on Annex I of the Directive on the Conservation of Wild Birds 2009/147/EC (codified version) (the 'Birds Directive') as requiring special conservation measures including but not limited to SPA classification, are specially protected under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), and are a bird of conservation concern and a Section 41 Priority species under the Natural Environment and Rural Communities (NERC) Act 2006. Separately and collectively, these place obligations on Highways England to avoid impacts on the breeding stone-curlew population.

The RSPB Wessex Stone-curlew Project has monitored breeding stone-curlews in central southern England since the mid 1980s. In 2016, there were 118 breeding pairs confirmed in central southern England and 246 pairs (estimated) in eastern England, giving a UK total of 364 pairs (estimated).

The proposals as presented have the potential for both construction and operational phase direct and indirect adverse impacts on stone-curlew and our Normanton Down nature reserve. We set out our concerns below:

Location of western portal

As no details are provided regarding the exact location and nature of the portal it is difficult to provide specific comment at this stage in relation to direct impacts on the Normanton Down reserve. However, at the indicative location it is likely to have significant detrimental impact on the wildlife interest of the reserve. The construction of the portal will certainly result in disturbance impacts on stone-curlew with a significantly reduced likelihood of them settling and successfully breeding. In 2016 two pairs of stone-curlew bred on the reserve. We look forward to being consulted on this issue as work on the full assessment progresses.

We are aware of concerns raised by English Heritage, Historic England and the National Trust regarding the proposed location of the western portal in relation to potential impacts on the archaeological features of the Normanton Down Barrow Group. Given that the main driver of the scheme is to remove the road from the WHS, thus removing the detrimental impact its presence has on the WHS' many archaeological features, it is evident the proposed location of the western portal fails to achieve this key objective.

Research conducted by Footprint Ecology in 2008² found a negative impact of trunk roads on stone-curlew nest density on arable land up to a distance of at least 1000 metres, and maybe up to 1500 metres. **The RSPB objects to the indicated location for the western portal due to its potential to negatively impact the Normanton Down RSPB nature reserve and its capacity to continue to support two breeding pairs of stone-curlew.** We urge Highways England to reconsider the location of the portal outside of the WHS boundary.

Bypass options

Both of the proposed routes as presented will directly impact stone-curlew nest sites, the northern route on two and the southern on three. In addition, there will be an effect on stone curlew resulting from the realignment of the A303 to one of the new proposed options. The RSPB would expect this impact to be assessed consistent with the Footprint Ecology research referred to above.

Together with this assessment, we would also expect to see modelling of the areas affected by car headlight shed as this could potentially be a disturbance factor. We are particularly concerned that our Normanton Down reserve will be affected in this way.

Removal of existing carriageway between the Avenue and Longbarrow roundabout

A stated objective of the scheme is to encourage people to explore more widely within the WHS, a principle that the RSPB supports subject to appropriate safeguards to protect its ecological features. Currently, the existing carriageway between the Avenue and Longbarrow roundabout acts as a physical barrier, and as such, the southern portion of the WHS experiences relatively few visitors. The proposed tunnel will remove this barrier, increasing the extent of uninterrupted downland landscape directly accessible from the WHS visitor centre and Stonehenge potentially resulting in a significant increase in visitor numbers to the south of the existing carriageway, including the RSPB nature reserve at Normanton Down.

Stone-curlews are known to be susceptible to disturbance from human activities. Research by Taylor in 2006³ on the Wessex stone-curlew population, showed that stone-curlews respond to potential disturbance agents at large distances (>500m) compared to many other birds. The main effect of disturbance was reduced likelihood of birds settling to breed

² Footprint Ecology 2008. The effect of housing development and roads on the distribution of stone-curlews in the Brecks.

³ Taylor, EC. 2006. Stone-curlews and human disturbance: effects on behaviour, distribution and breeding success

in habitat that is suitable in other respects. Models predict that where disturbance elicits an active response from the birds at frequencies exceeding one per hour the probability of site occupancy can be reduced from 60% to 15%.

We have serious concerns that the removal of the existing carriageway will have a negative impact on the current favourable status of the Normanton Down reserve in attracting and retaining breeding stone-curlew. The Environmental Impact Assessment (EIA) will need to robustly assess the predicted increase in numbers of visitors in the vicinity of the reserve and the impacts of such increases on rare and vulnerable wildlife, along with full details of how these impacts will be mitigated. We have particular concerns relating to the potential for the significant increase in recreational disturbance around the summer solstice celebrations, not only with regard to stone-curlew, but also other wildlife on the reserve and how this might be mitigated. The RSPB considers that access management is likely to be critical to reducing the disturbance effect and maintaining the integrity of the Normanton Down nature reserve.

Salisbury Plain stone-curlew meta population and the Salisbury Plain SPA

In addition to the direct impacts of the tunnelling, dualling and realignment of the A303 trunk road, the proposals could have a detrimental impact on stone-curlew with potential adverse impacts on the Salisbury Plain meta population and SPA.

Regulation 61 of the Conservation of Habitats and Species Regulations 2010 requires a competent authority to determine if any plan or project proposal is likely to have a significant effect on an SPA, and if necessary, carry out an appropriate assessment of its implications in view of the site's conservation objectives.

The RSPB is keen to work with Highways England and Natural England throughout the process to ensure robust assessment of the impacts and full consideration and adoption of avoidance and mitigation measures.

European Protected Species (EPS) and priority habitats

No information is provided regarding EPS and priority habitats. We are aware that there may be rare bat species present such as the Barbastelle *Barbastella barbastellus*. The proposal could also affect air quality by increasing traffic levels, which could affect priority habitats in particular species rich chalk grassland. The EIA will need to robustly assess these impacts and determine appropriate avoidance and mitigation in relation to these matters.

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