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Freepost A303 STONEHENGE CONSULTATION

09 April 2018

Dear Sir / Madam

A303 Stonehenge Public Consultation 2018

This letter constitutes our response to the current public consultation relating to the preferred route announced in September 2017.

The RSPB response¹ to the February 2017 public consultation on the route proposals detailed our objection and concerns relating to the scheme as published at the time, these are set out in summary in the attached Annex 1.

The *preferred route* represents a number of changes from the route proposals consulted on in 2017, and the Preliminary Environmental Information Report (PEIR) provides more detail regarding the assessment of environmental impacts and the measures being considered to address them. Consequently, we have reviewed our previous comments accordingly and summarise the key points below. Our reasons are set out fully in Annex 2.

¹ Published in Consultation Report Volume 4 September 2017

<https://highwaysengland.citizenspace.com/cip/a303-stonehenge/results/report-on-consultation---volume-4.pdf>

- **Location of the western portal.** We welcome the decision to move the location of the western portal to a position adjacent to the existing road, and acknowledge the consideration of potential impact on our nature reserve at Normanton Down in being a significant factor in this decision. Consequently, we are now able to remove our objection in relation to the location of the western portal.
- **Bypass options.** The proposals consulted on in 2017 (western portal nearer to the Normanton Down nature reserve together with northern and southern bypass options), would have had the potential to impact on at least five stone-curlew territories. The revised route alignment with portal adjacent to the existing road reduces this projected impact to the loss of one stone-curlew nest site near Parsonage Down National Nature Reserve. We have no objection to the revised alignment subject to the provision of suitable nesting habitat to compensate this loss as referred to in paragraph 8.6.35 of the PIER.
- **Removal of existing carriageway between the Avenue and Longbarrow roundabout.** Our concerns remain, however, that removal of the carriageway will result in an increase in recreational disturbance in the proximity of Normanton Down RSPB reserve with the likelihood of rendering it less favourable for stone-curlew. It is our view that risk of significant impact cannot be ruled out in this respect. We note the stated commitment (paragraph 8.6.36 PIER) to provide mitigating, and if necessary subsequent compensation, and will continue to work with Highways England towards an acceptable solution to avoid adverse impact.
- **Likelihood of adverse effect on more than 1% of the UK stone-curlew population, the Salisbury Plain meta population, and Salisbury Plain Special Protection Area (SPA).** Subject to the implementation of adequate measures to mitigate the impacts on stone-curlew from the road realignment near Parsonage Down, and the removal of the existing carriageway between the Avenue and Longbarrow roundabout, we are confident that significant adverse effect can be avoided.
- **Habitat connectivity at landscape scale.** Significant opportunity is presented by the scheme to achieve the Lawton principles of landscape scale conservation: more, bigger, better and connected. Ecological enhancement should focus on achieving strategic connectivity for species rich chalk grassland and associated species.

We welcome your consideration of our concerns, and trust our comments are helpful.

Yours faithfully,

Phil Sheldrake

Annex 1: Summary of RSPB response to A303 Stonehenge, Amesbury to Berwick Down Public Consultation, February 2017

The RSPB objected to the proposals detailed in the above consultation as in our view, they would directly impact a number of stone-curlew nesting territories, with 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 Salisbury Plain Special Protection Area (SPA). They were summarised 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 also expressed concerns that no information relating to the environmental impact of the proposals had been made available and reiterated our commitment to working with Highways England to developing acceptable solutions to safeguard the interests of wildlife in delivering the road improvement scheme.

Annex 2

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

Our objection was related to the possible impacts on wildlife on our Normanton Down nature reserve due to the close proximity of the proposed location. We are able to withdraw our objection in relation to the operational impact of the location of the western portal following the publication of the preferred route which shows its revised position to the north west of Normanton Gorse and adjacent to the existing A303.

There is the possibility, however, that stone-curlews may nest in the vicinity during construction of the portal (and during construction at other locations) and subsequently become subject to disturbance from construction activity. This needs to be recognised in the Construction and Environment Management Plan (CEMP) and include measures that could be employed to mitigate the effects (paragraph 8.6.33 PIER).

Bypass options

The previously consulted [north and south] bypass options for Winterbourne Stoke had the potential to adversely impact multiple stone-curlew nesting sites and we objected on this basis. The revised *preferred route* alignment of the surface section, however, will result in the loss of one nesting site adjacent, and to the south of Parsonage Down NNR. We have no objection to the revised alignment subject to this loss being adequately mitigated / compensated by the provision of alternative nesting habitat. Ideally, this habitat will be in a location as close as suitably possible to the current site. We note the commitment in paragraph 8.6.35 of the PIER to assess requirements to mitigate loss of breeding areas, and we are currently working with AECOM to identify and develop an acceptable solution.

In the 2017 consultation we highlighted the potential for car headlight shed to adversely impact stone-curlew nesting sites and our Normanton Down nature reserve. Following the revised alignment of the road and proposed deep cutting approach to the western portal, we no longer hold concerns that this will present a risk as a disturbance factor.

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 2006² 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 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. Paragraph 8.6.32 of the Preliminary Environmental Information Report (PEIR) makes reference to the provision of the tunnel in this respect; potentially resulting in an increase in visitor access and adverse impact on nesting success.

Paragraph 8.6.27 of the PIER recognises that 'the breeding population of stone-curlew present within suitable surrounding areas such as Normanton Down RSPB Reserve mixes with the breeding population within the Salisbury Plain SPA', and therefore can be considered to be functionally linked in supporting the SPA population.

Regulation 63 of the Conservation of Habitats and Species Regulations 2017 requires a competent authority to determine if any plan or project proposal is likely to have a significant effect on a SPA, and if necessary, carry out an appropriate assessment of the implications. This requirement is stated in para. 4.1.7 of the PEIR.

In our view the level of impact is unclear and therefore it will not be possible to conclude no likely significant effect following appropriate assessment. Furthermore, paragraph 8.6.36 of the PIER states that 'at this stage the proposed scheme may result in adverse effects on the breeding population....from indirect disturbance during the operational phase.' And goes on to state Highways England's commitment to providing requisite mitigation measures. This commitment is noted as summarised in paragraph 8.8.7.

² Taylor, EC. 2006. Stone-curlews and human disturbance: effects on behaviour, distribution and breeding success

In meeting this commitment, RSPB would expect to see a strategy developed to safeguard the favourable status of stone-curlew at the Normanton Down RSPB Reserve, which would include (i) a set of mitigation measures with the objective of avoiding disturbance impacts, (ii) a scheme to monitor the number and breeding success of nesting stone-curlews in order to detect the effect of disturbance with predetermined thresholds designed to trigger (iii) appropriate compensation measures.

The provision of fencing as a measure to deter people from accessing stone-curlew breeding areas is noted in paragraph 8.6.34 of the PIER. We would request that provision is made within the scheme to upgrade the fencing at Normanton Down to one that will act as an adequate deterrent.

RSPB considers that an access management plan for the Stonehenge World Heritage Site (WHS) is likely to be critical, not only in reducing the disturbance effect and maintaining the integrity of the Normanton Down nature reserve, but also in preserving the *wildlife refuge* in the quieter, southern half of the WHS, currently protected from significant levels of disturbance in part by the existence of the A303 acting as a physical barrier. We would be keen to contribute to the development of such a plan as part of a collaborative approach with other stakeholders.

Byways 11 & 12

Whilst we recognise that review of the current status of Byways in the WHS is not within the scope of this consultation we recommend that consideration be given to potential modifications aimed at disabling encampment eg. reducing widths, along Byways 11 & 12 in proximity to the Reserve, as a measure to reduce the likelihood of disturbance. Certainly, we would expect to see the potential for people to park up or camp reduced by design on the proposed new link between Byways 11 & 12 just south of the existing A303. Additionally, to further safeguard our Normanton Down Reserve from the effects of disturbance we would urge Highways England to consider rerouting the proposed link alongside the northern boundary of the field, adjacent to what will be the new byway following removal of the existing road.

Habitat connectivity at landscape scale

There are significant opportunities for the scheme to achieve net enhancement for biodiversity through the creation, restoration, extension and connection of ecological features. These particularly relate to the strategic connectivity for chalk grassland habitats and associated species. Habitat creation should focus on the early successional chalk habitats and be supported by an ongoing monitoring programme to inform an adaptive management plan.

We fully support the scope of opportunities summarised in section 8 of the PIER, particularly the aim of facilitating the spread of invertebrates, such as butterflies of chalk grassland through the creation of a

new 'green' byway following removal of the existing road, and the provision of 'green' bridges, as outlined in paragraph 8.8.7.

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