

From: [Routh, Charles](#)
To: [A303 Stonehenge](#)
Subject: RE: A303 Amesbury to Berwick Down - Examining Authority's Second Written Questions. NE ref: 288164
Date: 24 July 2019 13:22:51

Dear Sir/Madam, please find our response to the questions directed towards Natural England as part of the above consultation.

Ec.2.1 Applicant
Natural England

RSPB The landowners of Normanton Down reserve have stated that they would not agree to the erection of enhanced fencing to deter trespass and to manage the risk of increased visitor pressures in the southern part of the World Heritage Site (ie south of the existing A303) impacting adversely on the breeding success of protected species such as the stone curlew.

i Please explain how this could be addressed, and what other measures could be put in place; and how such measures would be secured. **Highways England are, as we understand it, pursuing alternative mitigation options so that no reliance is needed on these measures.**

ii In the absence of such agreement in respect of enhanced fencing, what are the consequences in terms of any assumptions made in the HRA and ES that this solution would be successfully delivered. **See response above.**

Ec.2.3

Applicant

RSPB

Natural England

i. 4.1 to 4.3 of the SoCG with RSPB refer to ongoing discussions around mitigation delivery and monitoring in respect of stone curlew, including "in the unlikely event that the need for additional plots is triggered by unsuccessful mitigation" [REP2-017].

ii. Noting that these matters may be considered in the HRA technical note being prepared, can the Applicant, RSPB and Natural England comment in particular on how the need for additional plots would be triggered and how they would be delivered.

Natural England understands that Highways England is considering committing to delivering additional plots irrespective of impact sufficient to mitigate a worst case scenario. If this is pursued, the issue of triggering is can be sidestepped. Highways England are better placed to advise on delivery. However, subject to suitable commitments from Highways England, we see no particular reason why this mitigation cannot be treated as being certain to be effective (in HRA terms) both in terms of delivery certainty and certainty of ecological efficacy once delivered.

iii. In particular, the ExA is concerned about being satisfied 'beyond reasonable scientific doubt' whilst uncertainty remains (as demonstrated by the phrase "in the unlikely event that") and the acknowledgement that further mitigation might be necessary (where the proposed mitigation proves "unsuccessful") to address potential effects of the Proposed Development.

As per our response above, our understanding is that Highways England is considering committing to delivering additional plots irrespective of impact, sufficient to mitigate a worst case scenario. If pursued, than irrespective of the success of on-site mitigation measures at Normanton Down, offsite mitigation will be sufficient to mitigate worst case impacts.

Charles Routh
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