



ENGLISH HERITAGE

**COMMENTS ON APPLICANT'S CONSULTATION
REPORT ON CHANGES TO THE DCO APPLICATION**

[AS-066 & AS-067] (DEADLINE 8a)

**ON BEHALF OF ENGLISH HERITAGE TRUST (EHT) TO
THE EXAMINING AUTHORITY (ExA)**

Re: Application by

**Highways England (HE) for an Order granting Development
Consent for the A303 Amesbury to Berwick Down**

PINS Reference No: TR010025

Interested Party Reference No: 20020117

Comments on HE Proposed Changes for NMC-06: Public right of way to Stonehenge Visitor Centre [Document REP8-015]

1. At Deadline 8, EHT updated that it is understood that Option A cannot proceed as it is now understood that Wiltshire Council does not agree the option. EHT appreciates Highways England's efforts to reduce the impacts of concern to EHT, but considers that Option B provides only a relatively modest reduction in impacts and concerns in comparison to the original public right of way adjacent to the (A360 PROW) contained in the DCO application. EHT's objection is maintained.
2. EHT notes that HE in its proposed changes [Document REP8-015] now intends to promote a substitute solution, which delivers a non-motorised user facility equivalent to that proposed in NMC-06 Option B, which obviates the need for all land owner consents and, in part, relies on Wiltshire Council's highway authority powers over the C506.
3. EHT's previous concerns have not all been addressed.
4. EHT is perplexed by the reference to in paragraphs 4.8.21 and 5.7.6 [Document REP8-015] that the impact on the overflow parking operation for the Visitor Centre would be significantly less - the strip of land required in this area for the original DCO proposal is approximately 11 metres wide, whilst for Option B is approximately 1 metre wide.
5. That does not accord with EHT's understanding. EHT has requested that HE provide drawings and information to support this statement and await HE's response.
6. There is no acknowledgement in HE's assessment that Option B or the original DCO proposal for the A360 PROW severs the Dew Pond from the Visitor Centre and there will be a large amount of EHT land that forms part of the current Visitor Centre that will become inaccessible and unusable between the new A360 PROW and current A360 highway boundary.
7. EHT responded to HE during their public consultation in August 2019 that EHT does not support Option B also because of the negative impact it has on the Dew Pond which in effect becomes severed from the Visitor Centre site. This would make it difficult to maintain and has a significant impact on the Visitor Centre complex in this area.
8. The A360 PROW would need to be fenced on both sides to prevent slips, trips and falls on the slope into the Dew Pond. However, the approach to fencing would need to be considered carefully.

9. This means the fencing for Option B will be far more intrusive than Option A and EHT is concerned of the cumulative impact of this additional infrastructure within the World Heritage Site. If it wasn't fenced, this would mean users are not physically limited from straying on to EHT private land and encourage users to do so, potentially taking over the land – the A360 PROW would in effect be very wide – a number of metres.

10. During the Stonehenge Environmental Improvement Project when the Visitor Centre was created, great lengths were taken to ensure the new infrastructure was minimised and (particularly the car park access road) worked with the contours of the landscape particularly the Dew Pond. The proposed route of Option B detracts from the design ethos of the site.

20 September 2019