

A303 Amesbury to Berwick Down

TR010025

Deadline 7 8.46 – Response to English Heritage objection to PRoW to Visitor Centre

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A303 Amesbury to Berwick Down

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Response to English Heritage objection to PRoW to Visitor Centre

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E	xecu	tive summary1
1	Ne	ed for public right of way2
2	Th	e Scheme Proposal5
3	En	glish Heritage Objections5
4	Alt	ternative Proposals7
5	Op	otions alongside A36010
	5.1	Option 10 - Shared-use cycleway alongside A360 (west of Dew Pond) 10
	5.2	Option 11 - Shared-use cycleway alongside A360 (east of Dew Pond) 10
6	Op	otions alongside A34411
	6.1	Option A along A344 – Shared-use cycleway and footway alongside A34411
	6.2	Option B along A344 – Shared-use cycleway and footway alongside A34411
	6.3	Option C along A344 – Shared-use cycleway and footway alongside A34411
	6.4	Option D along A344 – Shared-use cycleway and footway alongside A34411
7	Re	sponse to EHT Objections13
	7.1	Written Representation at Deadline 2 [REP2-090 to 092]13
	7.2	Potential negative impact on English Heritage visitor operation13
	7.3	Potential conflict between non-motorised byway users and motorised
	vehic	cles13
	7.4	Potential negative knock-on impacts for A360/B3086 road users 14
	7.5	Potential safety risks14
	7.6	Negative Impact on recent investment
	7.7	Negative impact on design principles16
	7.8	Potential security risks
	7.9	Heritage impacts
8	Co	onclusion 17
A	ppen	dix 1 – Wiltshire Council - Existing Rights of Way18
A	ppen	dix 2 - Record of Engagement with EHT on PRoW to Visitor Centre 19
A	ppen	dix 3 – Alternative Proposals20
		dix 4 – Carpark User Analysis21
		dix 5 – Risk assessment for NMU options along A34425
A	ppen	dix 6 – Road Safety Auditor Comment26



Executive summary

This report considers in more detail English Heritage Trust's ('EHT') objections [REP2-090 and REP2-092] to the proposed public right of way ('PRoW') alongside the A360 east of the Stonehenge Visitor Centre, which is included in the Scheme comprised in Highways England's DCO application.

This report summarises the need for, and the benefits that would arise from, the Scheme's PRoW proposals which would enhance connectivity to, within and through the World Heritage Site, would provide improved and safer access for non-motorised users and would facilitate access to the Visitor Centre for these users.

The Scheme proposals are not anticipated to give rise to any unacceptable impacts to the operation of the surrounding highway network, taking into account anticipated levels of non-motorised user use and peak numbers of motorised vehicles travelling to or from the Visitor Centre.

This report is accompanied by a safety audit that considers the safety concerns raised in EHT's Written Representation [REP2-090 and REP2-092]. It concludes that overall the risks to people gaining access to the Visitor Centre would not be significantly increased by the presence of the proposed PRoW.

This report also outlines the engagement the Applicant has had with EHT with a view to addressing EHT's concerns. It outlines the series of alternative proposals that the Applicant has considered with EHT and which have led to the Applicant consulting on, and submitting, a Proposed Change Application [AS-067] for two alternative PRoW proposals. Each of the alternative PRoW proposals would require the Applicant to obtain the consent of each person with an interest in the additional land required to deliver them, to avoid engaging the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 and would require the Examining Authority to make a procedural decision to accept the chosen PRoW alternative for Examination.



1 Need for public right of way

- 1.1.1 An important consideration during the Applicant's development of the Scheme has been the objective of integrating the Scheme within the existing byway network and, where the opportunity exists, creating legacy benefits for non-motorised users in accordance with the Applicant's Strategic Business Plan and the Roads Investment Strategy, both of which are aligned with Government policy, as reflected in national and local policies and plans, to encourage walking, cycling & horse-riding.
- 1.1.2 A byway along the route of the existing A360 between Longbarrow Roundabout and Airman's Corner was originally proposed when the Applicant carried out its initial statutory pre-application consultation in February 2018. This proposal was subsequently clarified, at the supplementary consultation in July 2018, as being for a restricted byway. The proposed restricted byway alongside the A360 was intended to remove vulnerable non-motorised users from the busy A360.
- 1.1.3 The need for the restricted byway route alongside the A360 is driven by the anticipated demand from non-motorised users to explore the World Heritage Site. The network of proposed restricted byways included within the Scheme would provide access from Winterbourne Stoke and Amesbury for the mobility impaired, walkers, cyclists, equestrians and carriage drivers to the Visitor Centre. It would open up a circular route from the Visitor Centre, along the old A344 to the Cursus and Stonehenge monument, returning via the new restricted byway along the line of the existing A303 which is proposed to be stopped up by the Scheme. This return route would provide views over other monuments such as the Sun Barrow and the Winterbourne Stoke Barrow group.
- 1.1.4 Given the distances involved, the circular routes are more likely to be attractive to cyclists, equestrians and carriage drivers. For example, the time needed to cover the 2.5 miles from Winterbourne Stoke to the Visitor Centre is about 50 minutes on foot / horseback and 15 minutes by bicycle. This route would also provide an important link towards the network of byways north of Rollestone Cross.
- 1.1.5 For walkers, cyclists, equestrians and carriages the proposed restricted byway would complement other improvements to the PRoW network proposed within the Scheme. Off-road access to and from Winterbourne Stoke and the west would deliver non-motorised users to Longbarrow roundabout and the new restricted byway along the alignment of the existing A303. From Amesbury and the east, access to Longbarrow roundabout would be via the proposed restricted byway along the line of Stonehenge Road and the existing A303.
- 1.1.6 At the Compulsory Acquisition Hearing on 10th July 2019, Wiltshire Council expressed its support for a non-motorised user route (which could be a shared-use cycleway) proposal, stressing the need for safe off-road routes



- for non-motorised users. The Council identified the potential for links to the wider public rights of way network and noted that the Scheme proposals would contribute to the Council's Rights of Way Improvement Plan.
- 1.1.7 Feedback from cyclists from the Shrewton area to the north west of the World Heritage Site indicates a desire for safe off-road access to Amesbury and Salisbury that is beyond the ability of this Scheme to deliver. However, the Scheme could provide part of that route with the remainder to be delivered separately. In particular, the proposed restricted byway (included in the DCO application) would provide a safe route for cyclists between the Visitor Centre and national cycle network route 45 between Salisbury and Amesbury.
- 1.1.8 In summary, the proposed public right of way route along the A360 would enhance the accessibility of, within and through the WHS, would provide improved, safer access for non-motorised users, and would facilitate access to the Visitor Centre for these users.
- 1.1.9 Figure 1 below shows the existing public right of way network (black lines) including national cycle network route 45 (pink lines). It also shows how the proposed new rights of way (red lines) included in the Scheme would integrate with and extend and enhance the existing network. Appendix 1 to this report shows the detail of the existing public rights of way network.



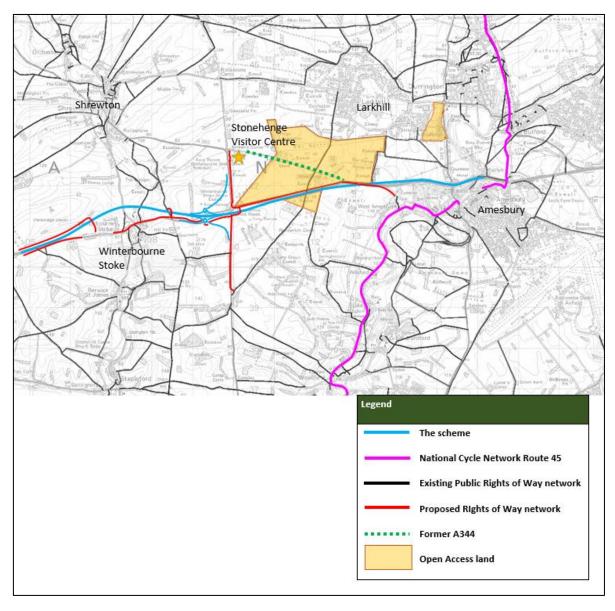


Figure 1 – existing and proposed public rights of way network



2 The Scheme Proposal

2.1.1 As part of the A303 Scheme for which a DCO application has been submitted and accepted for examination, Highways England proposes a 4m wide restricted byway alignment on the eastern side of the A360, connecting into the local public rights of way network at the proposed Longbarrow junction to the south-west of the World Heritage Site, then running north-south, on an alignment lying to the east of the dew pond between the southbound carriageway of the A360 and the Visitor Centre, up to the Airman's Corner roundabout. The Scheme seeks to improve connectivity, enabling non-motorised users to access and explore the World Heritage site.

3 English Heritage Objections

- 3.1.1 In its Written Representation [REP2-090], English Heritage Trust (EHT) objected to the Applicant's Scheme proposals (as outlined above 'the proposed PRoW') on operational, safety, security and environmental grounds. In summary, EHT has stated that it objects to this proposal for the following reasons:
 - Potential negative impact on English Heritage visitor operation
 - Potential conflict between non-motorised byway users and motorised vehicles
 - Potential negative knock-on impacts for A360/B3086 road users
 - Potential safety risks
 - Negative impact on recent investment
 - Potential security risks
 - Negative impact on design principles
 - Heritage impacts
- 3.1.2 In Appendix 3 of its Written Representation [REP2-090], EHT provided a Public Right of Way Health and Safety Statement which identifies four potential hazards to members of the public using the proposed PRoW. In Appendix 2 to its Written Representation [REP2-092] EHT provided a Route Options Review, recording its assessment of the various options then under consideration as part of the Applicant's endeavours to propose a design solution acceptable to EHT.
- 3.1.3 The Applicant addressed the eight grounds of EHT's objection (listed at the bullet points above) in its response to EHT's Written Representation [REP3-013]. In the same response the Applicant stated that it is working collaboratively with EHT "to seek to explore an alternative route which addresses its concerns and meets the objective of improving access for non-motorised users".



- 3.1.4 This report provides an update on the progress of this collaborative process and sets out in more detail the Applicant's responses to the issues raised in Appendices 2 and 3 to EHT's Written Representation.
- 3.1.5 EHT has also objected to the Applicant's proposal to acquire land compulsorily for the purposes of delivering the proposed PRoW, where EHT or Historic England have an interest in the land required. EHT's objections on grounds relating to the Applicant's compulsory acquisition proposals were considered in detail at the compulsory acquisition hearing held on 9 and 10 July 2019. The Applicant's position on the matter is set out in its written summary [REP5-002] under agenda item 8.2 on pages 2-33 to 2-34.



4 Alternative Proposals

- 4.1.1 In its Route Options Review [REP2-092], EHT assessed three right of way corridors between the south west and north east of the Stonehenge Visitor Centre complex. These are summarised as:
 - Option A, around the west and north of the Visitor Centre following a similar route to the Scheme as proposed in the DCO application;
 - Option B, around the south and east of the Visitor Centre; and
 - Option C, through the Visitor Centre.
- 4.1.2 This review by EHT concluded with a recommendation that Option B should be taken forward. However, Option B requires land outside of the Order limits and not within EHT ownership.
- 4.1.3 Highways England has continued to engage with English Heritage (details of that engagement are set out in Appendix 2 to this report) and with other stakeholders since the supplementary consultation in July/August 2018 and has assessed a number of alternatives to the proposed PRoW. These are summarised in terms of the same right of way corridors as follows:
 - Option A: Eleven options for a public right of way, of different designations, to the east or west of the A360 between Longbarrow Roundabout and the Stonehenge Visitor Centre.
 - Option B: An alternative route for the public right of way, which would have been designated as a restricted byway, was developed outside and to the east of the boundary of the Visitor Centre site. The adjacent landowner, whose consent would be required, has rejected this proposal.
 - Option C: The possibility of terminating the public right of way at the southern boundary of the Visitor Centre has been rejected on safety grounds. There is no safe route for non-motorised users to follow in a northerly direction from this point.
- 4.1.4 The Applicant's further consultation with EHT identified that there were two preferred options, both within the option A corridor; referred to as options 10 and 11, these preferred options are presented in this report. They each comprise proposals for a shared-use cycle path along the east side of the A360, with one option running to the west side of the dew pond (Option 10) and the other (Option 11) running to the east side of the dew pond (located between the east side of the A360 and the west side of the Visitor Centre.
- 4.1.5 Both of these two options would remove the potential (included in the DCO application proposal) for horses and carriages to use the PRoW, and both would have less of an impact (than other options considered) on the entrance to the Visitor Centre car park. The reduced PRoW width of a shared-use cycle path (compared with the restricted byway proposal in the DCO application) would result in reduced land acquisition from EHT, and hence a lower impact on the Visitor Centre car park.



- 4.1.6 As the two preferred options, Options 10 and 11 now feature in the Applicant's Proposed Changes Application [AS-067], where they are presented under reference NMC-06 and identified as options "A" and "B" respectively. They are also currently subject to public consultation, as part of a package of eight proposed non-material changes comprised in the Applicant's Proposed Changes Application.
- 4.1.7 However, for either of options 11 and 12 (Options "A" and "B" as presented in NMC-06 [AS-067]), the consent of all persons with an interest in any 'additional land' (being outside the Order limits currently set out in the DCO application) is required, otherwise the procedures in the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 ('the CA Regulations') would be engaged.
- 4.1.8 As is explained in paragraph 3.1.6 of the Proposed Changes Application, the Applicant does not wish to engage the CA Regulations in connection with the Scheme. Therefore if the additional land required to deliver either NMC-06 Option A or Option B cannot be secured by agreement (and supported by written evidence of such consent/agreement) prior to the close of the Proposed Changes Consultation, then Highways England would withdraw either NMC-06 Option A or NMC-06 Option B, or both. To avoid confusion with the EHT Options A, B, or C, hereafter in this report, NMC-06 Option A is referred to as "Option 10" and NMC-06 Option B is referred to as "Option 11".
- 4.1.9 As explained above, Option 11 would provide a 2.5m-wide shared-use cycle path along the east side of the A360 and to the east of the dew pond, i.e. between the dewpond and the Visitor Centre car park. This section of the route is within the Order limits (as set out in the DCO application). Option 10 would also keep the route adjacent to the A360, but, in contrast, would run, with a reduced width, to the west of the dew pond, i.e. between the A360 and the dew pond. Option 10 would require additional land outside the Order limits over a short distance around the dew pond. The landowner (of this additional land) has indicated they may be prepared to negotiate for this area being acquired. Both of these options are further detailed in section 5 below and are illustrated in Appendix 3 to this report.
- 4.1.10 Options 11 and 12 would both require additional land outside the Order limits to deliver an extended length of proposed shared-use cycleway running eastwards from Airman's Corner, along the C506 (former A344) towards the entrance to the Visitor Centre.
- 4.1.11 Four options (A to D) have also been considered for this east-west extension of the route, each of which could be linked to either of options 10 or 11. Each of these four options would require additional land outside the Order Limits of the draft DCO. Therefore, if taken forward, any one of these options would require consent to the use of the land for the purposes of the PRoW proposal from Wilshire Council (having an interest in the land by virtue of its being the local highway authority) and from a small number of other parties, being adjoining landowners and owners of the subsoil beneath the half width



of the highway (which is unregistered, such that the *ad medium filum* presumption applies). These four options are detailed in section 6 below and are illustrated in Appendix 3 to this report.



5 Options alongside A360

5.1 Option 10 - Shared-use cycleway alongside A360 (west of Dew Pond)

- 5.1.1 Option 10 includes a proposed shared-use cycleway link on the eastern side of the A360, routed to the west of the Dew Pond. This option includes a 1.0m wide verge next to the A360 and a shared pedestrian / cycle facility 2.5m wide. This option has a reduced width of 1.5m past the dew pond. This option then continues alongside the C506 (former A344) crossing the car park entrance and terminating opposite the coach park access road in order to provide a connection to the World Heritage Site.
- 5.1.2 Option 10 significantly reduces the area of land proposed to be subject to compulsory acquisition compared with the DCO proposals and reduces the area by which overflow parking within the Visitor Centre site would be reduced. The area of land proposed to be acquired from within the Visitor Centre site for the purposes of the current DCO proposal is 3,527 square metres; in contrast, the area required for option 10 is only 228 square metres. However, 77m² of this, and a further 65m² not within EHT ownership, would be outside the Order Limits where the shared-use cycle route passes to the west of the Dew Pond. Depending on the option selected to extend the shared-use cycle route along the C506, further land outside the Order Limits would be required (see section 6 below).
- 5.1.3 Option 10 is shown on drawing HE551506-AMW-ENM-SW_GN_000_Z-SK-CH-0023 in Appendix 3 to this report.

5.2 Option 11 - Shared-use cycleway alongside A360 (east of Dew Pond)

- 5.2.1 Option 11 would be similar to option 10 except that the shared-use cycleway would pass to the east of the dew pond following an alignment similar to that of the restricted byway proposed in the DCO application. A width of 2.5m would be maintained for the full length of the shared-use cycleway.
- 5.2.2 The area of land proposed to be acquired from within the Visitor Centre site for the purposes of delivering option 11 is 1,568 square metres. This is all within the current Order Limits. Depending on the option selected to extend the shared-use cycle route along the C506, further land outside the Order Limits would be required (see section 6 below).
- 5.2.3 Option 11 is shown on drawing HE551506-AMW-ENM-SW_GN_000_Z-SK-CH-0301 in Appendix 3 to this report.



6 Options alongside A344

6.1 Option A along A344 – Shared-use cycleway and footway alongside A344

6.1.1 Option A proposes that the shared-use cycleway link alignment would be terminated 50 metres west of the passengers' waiting area (on the periphery of the Visitor Centre). The footway element would extend in an easterly direction to meet the existing footway east of the passengers' waiting area. Additional land (an area of 1,175m²) outside the Order Limits would be required. Option A is shown on drawing HE551506-AMW-ENM-SW_GN_000_Z-SK-CH-0309 in Appendix 3 to this report.

6.2 Option B along A344 – Shared-use cycleway and footway alongside A344

6.2.1 Option B adopts the same alignment as Option A. However, option B moves the existing bus stop from the old A344 into the layby. Additional land (an area of 1,124m²) outside the Order Limits would be required. This option has been discounted and hence it is not shown in the drawing comprising Appendix 3 to this report.

6.3 Option C along A344 – Shared-use cycleway and footway alongside A344

6.3.1 Option C proposes that the shared-use cycleway link alignment would be terminated 50 metres west of the passengers' waiting area, with a new footway to be developed on the verge north of the old A344 to avoid the shuttle bus waiting area. Additional land (an area of 1,224m²) outside the Order Limits would be required. Option C is shown on drawing HE551506-AMW-ENM-SW_GN_000_Z-SK-CH-0307 in Appendix 3 to this report.

6.4 Option D along A344 – Shared-use cycleway and footway alongside A344

- Option D adopts the same alignment as Option A. However, in option D the shared-use path would terminate opposite the coach park access road and immediately to the east of the gate, preventing public vehicle access onto the C506 (former A344). The proposed footway would extend in an easterly direction to meet the existing footway between the Visitor Centre and the coach park. Additional land (an area of 652m²) outside the Order Limits would be required. Option D is shown on drawing HE551506-AMW-ENM-SW_GN_000_Z-SK-CH-0311 in in Appendix 3 to this report.
- 6.4.2 Option D would encourage pedestrians heading east towards Stonehenge to do so via the Visitor Centre rather than via the shuttle bus stop or turnaround. This would minimise the potential conflict between PRoW users and the operation of the Visitor centre. As such option D is considered to be



the preferred option and has been incorporated in each of the options included in the Applicant's Proposed Change Application (i.e. NMC-06, Options A and B, in AS-067).



7 Response to EHT Objections

7.1 Written Representation at Deadline 2 [REP2-090 to 092]

7.1.1 The full text of English Heritage Trust's (EHT) objection to the proposed public right of way is set out in EHT's Written Representation, submitted at Deadline 2 [REP2-090 and REP2-092]. The following sections of this report summarise the objections raised by EHT, and also summarise the Applicant's response. While the Applicant remains of the view that its Scheme proposals (as included in the original DCO application) are appropriate and would not give rise to the issues raised in EHT's written representation, this section also considers how the Applicant's Proposed Changes (specifically NMC-06), if the necessary land owner consents were obtained, and if the proposed change NMC-06 was accepted for examination by the Examining Authority, may provide further comfort for EHT.

7.2 Potential negative impact on English Heritage visitor operation

- 7.2.1 This ground of objection is understood to mean impact on vehicle access to the car and coach parks and on the visitor experience.
- 7.2.2 Under the proposed Scheme (as included in the original DCO application) vehicles would have right of way at any NMU crossing point. These crossings are therefore unlikely to have a significant impact on vehicle flows. Providing for more sustainable travel choices may improve the visitor experience.
- 7.2.3 Options 10 and 11 would also afford EHT's visitors driving to the car park priority over the public using the non-motorised user route. There would be no interface with the coach park access. This is addressed in more detail below.

7.3 Potential conflict between non-motorised byway users and motorised vehicles

- 7.3.1 In relation to the Scheme (as included in the original DCO application), the Applicant recognises that the potential risk of conflict between motorised and non-motorised users is perceived by EHT to be high. However, the interface between pedestrians, cyclists and motor vehicles at junctions is frequently managed elsewhere by highway authorities and site operators such as other visitor attractions, supermarkets, shopping centres, etc. without an unacceptable level of incidents and there is no reason to believe that the situation would be any different here.
- 7.3.2 For alternative options 10 and 11, the main non-motorised/motorised vehicle conflict points are where the shared-use cycleway would cross the car park access road, the coach park access and at the shuttle bus stop. The proposed PRoW would be extended to include or circumvent each of these



- potential conflict points and non-motorised user movements would be better controlled and more predictable.
- 7.3.3 At the car park access road crossing, a number of options have been developed. Each one gives priority to the vehicles entering the car park. These options are illustrated in drawing No HE551506-AMW-ENM-SW_GN_000_Z-SK-CH-0017. See Appendix 3 to this report.
- 7.3.4 The car park provides a total of 494 spaces for cars and other vehicles. English Heritage advises that overflow parking is provided on the adjacent grassed areas for up to 80 days per year. Existing pedestrian use of the wider World Heritage Site is analysed in Appendix 4 to this report. The analysis demonstrates that the number of pedestrians and cyclists would not be sufficient to create delays to vehicles at the crossing during the busiest periods, resulting in no increase in congestion approaching the car park access road junction with the former A344. Whilst the potential for conflict is recognised, is not considered that it would cause congestion at the car park entrance. The interface between pedestrians, cyclists and motor vehicles at junctions is frequently managed elsewhere without an unacceptable level of incidents. The alternative proposals would avoid any conflict between users of the non-motorised user route and the coach park access.

7.4 Potential negative knock-on impacts for A360/B3086 road users

7.4.1 EHT's concern is that the conflict with non-motorised users as described above will cause tailbacks which will in turn cause delay to users of the other arms of Airman's Roundabout. However, as vehicles will have a right of way over pedestrians and cyclists at any crossing point, these crossings are unlikely to have a significant impact on vehicle flows. See Section 7.3 above. This applies equally to the proposed Scheme (as included in the original DCO application) and to the alternative options outlined in this report.

7.5 Potential safety risks

- 7.5.1 The Scheme PRoW proposal (as included in the original DCO application) terminates the non-motorised user route at Airman's Corner. EHT is concerned that users would then access the A360 and/or visitor centre access road in an uncontrolled manner which could cause accidents. This could be exacerbated by foreign visitors unfamiliar with driving on the left.
- 7.5.2 EHT included in its Written Representation a Public Right of Way Health & Safety Statement (Appendix 2 to EHT's Written Representation [REP2-090] which raised four specific concerns:
 - Member of the public being struck by a vehicle on site
 - Member of the public/staff member being struck by a bicycle/carriage on site



- Member of the public/staff member being struck by a vehicle on the A344/A360
- Member of the public falling on the route (east of Visitor Centre)
- 7.5.3 Highways England has carried out a review of the Health and Safety Statement. This review was completed by a Road Safety Auditor independent of the A303 Stonehenge project team. The Auditor agrees that it is preferable to separate motorised and non-motorised users wherever possible but concludes: "Overall the risks to people gaining access through the site would not be significantly increased by the presence of the path. It is also considered that the risks to anyone entering the site from the new path would be no different than for those conventionally accessing the car park."
- 7.5.4 The Auditor's response is included in Appendix 6 to this report.
- 7.5.5 The alternative PRoW proposals outlined above (and included in the Proposed Changes Application as NMC-06 Options A and B) each provide an extension to the non-motorised user route along the southern side of the C506 (former A344) and seek to further control the behaviour of pedestrians and cyclists and guide them to safer access and crossing points. Risk assessments for the non-motorised user alternatives along the C506 are included in Appendix 5 to this report.

7.6 Negative Impact on recent investment

- 7.6.1 At the time of the submission of EHT's Written Representation (Deadline 2) it was not clear how the proposed PRoW would have a negative impact on EHT's investment in the Visitor Centre. This ground of objection is now understood to refer to loss of overflow parking capacity in the area alongside the A360 at the southern end of the Visitor Centre site. The Applicant acknowledges that the land requirements for the proposed PRoW would include some of the land currently used by EHT for overflow parking between the laid-out car park and the A360. Therefore, the Applicant's alternative proposals (included in the Proposed Change Application) include a reduced width non-motorised user route and hence require less land acquisition from the Visitor Centre car park, subject to the necessary consents being obtained and subject to the Examining Authority's acceptance of NMC-06 within the Applicant's Proposed Changes Application.
- 7.6.2 The area of EHT's overflow car park is an estimated 2,437m2. The land proposed to be acquired from the overflow car park area in furtherance of the various options discussed above is as follows:
 - For the Scheme presented in the DCO application: 587 m2
 - For Option 10: 100 m2 (approx. 0.8-1m wide strip for a length of 110m)
 - For Option 11: 110 m2 (approx. 0.8-1m wide strip for a length of 110m)



7.7 Negative impact on design principles

- 7.7.1 EHT's car park scheme was based on minimum infrastructure and was designed to take into account the dry valley in which it sits; it is intended to be discreet and fit within the contours of the landscape. EHT is concerned that the proposed NMU route would not be in keeping with these design principles.
- 7.7.2 The Applicant's response submitted at Deadline 3 [REP3-013] to EHT's Written Representation submitted at Deadline 2 [REP2-090 and 092] stated that the detailed design of the Scheme will be governed by a set of design principles included within the Outline Environmental Management Plan [REP3-006 as at Deadline 3] and agreed by heritage stakeholders.
- 7.7.3 Further clarification of the design vision, principles and commitments have since been added to the OEMP [REP6-011 as at Deadline 6] which would apply equally to either the Proposed Scheme or to the alternative proposals comprised in NMC-06 options A and B. The surface finish of the proposed shared-use cycleway in options 10 or 11, or the Scheme proposals (in the original DCO application), would be determined through the same process as that which is required to be applied to the proposed restricted byway along the alignment of the existing A303, and would be subject to the design commitments and design principles applicable to PRoWs as set out in the OEMP. Subject to detailed design, the footpath section within the Visitor Centre area could use the same colour and textured resin-bound materials that have been used for the existing paths within the Visitor Centre site. The post and wire fence alongside the existing A360 could be relocated to prevent access to the carpark from the shared-use cycleway alongside the A360. There would thus be no negative impact on the design principles adopted for the Visitor Centre site.
- 7.7.4 As part of the Stakeholder Design Consultation Group (SDCG) EHT would be consulted on the development of the detailed design.

7.8 Potential security risks

7.8.1 While the Applicant recognises the security concerns of EHT, it does not consider that access by pedestrians and cyclists along a dedicated route parallel to a public highway significantly increases this risk. A new fence would be provided between the shared-use cycleway and the Visitor Centre, site, similar to that currently provided (i.e. replacing the existing boundary fence).

7.9 Heritage impacts

7.9.1 EHT is concerned that the Scheme as submitted could compromise a postmedieval feature known as a dew pond that sits within the curtilage of the Stonehenge Visitor Centre. Although not a scheduled monument, this is a significant feature in the modern Stonehenge landscape. To mitigate the risk



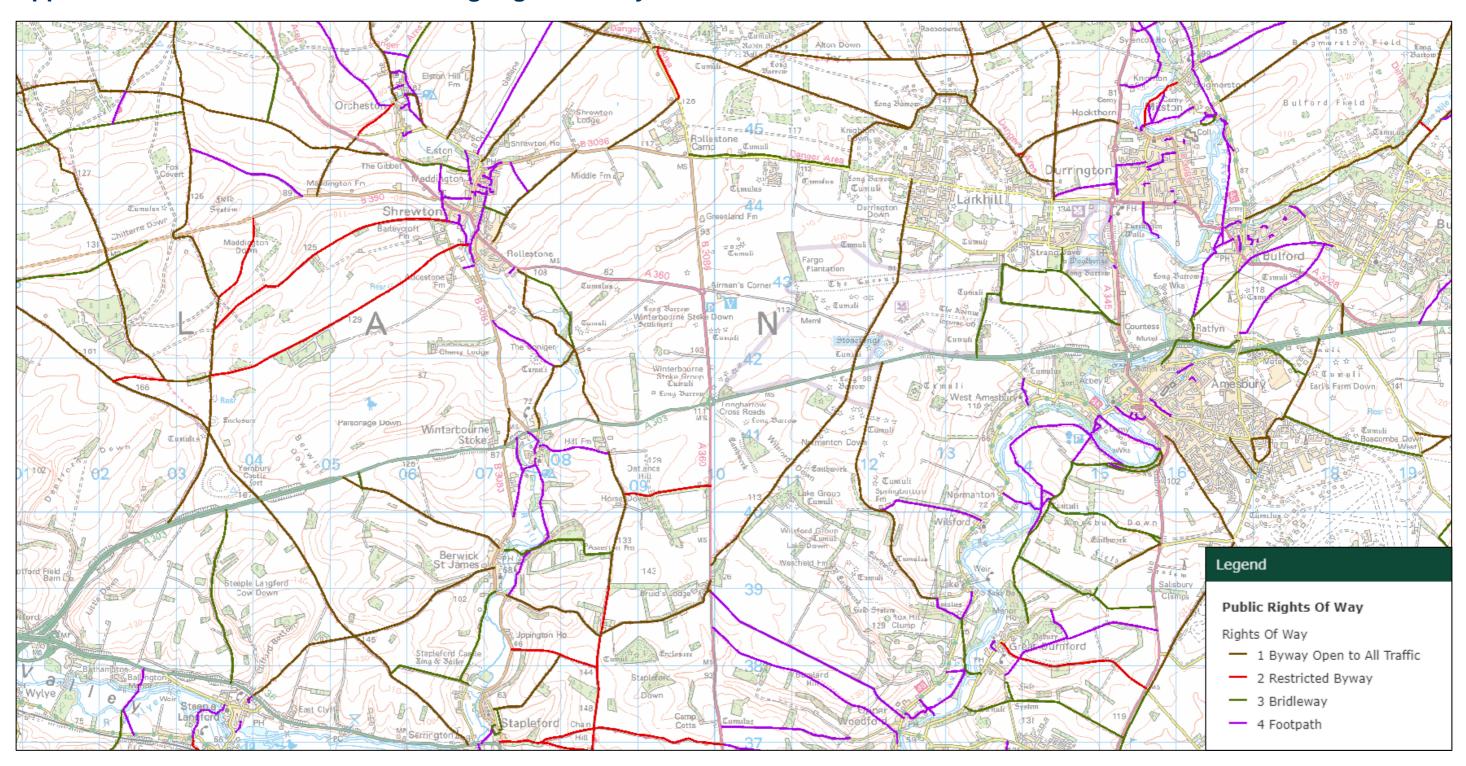
- of impacts on the dew pond, and irrespective of which option is ultimately taken forward, the works would be conducted in accordance with the measures set out in the DAMS [REP-013] and OEMP [REP6-011], secured by requirements 4 and 5 of the draft DCO [REP6-006].
- 7.9.2 Option 11 skirts to the east of the dew pond at a similar distance to the existing A360. Option 10, between the A360 and the dew pond, is slightly closer to the dew pond but on the highway side of it, and has a reduced total width compared to option 11. Both options are designed to minimise the impact on the dew pond.

8 Conclusion

- 8.1.1 This report considers English Heritage's objections to the Applicant's proposed restricted byway to the east of the A360, as presented in its application for development consent. It demonstrates that the Applicant's proposals are acceptable in highways terms and would be safe. It also presents two alternative options for a shared-use cycleway link alongside the A360 and A344 which would reduce the quantity of land required from within the English Heritage Visitor Centre site.
- 8.1.2 The Applicant will continue to engage with English Heritage Trust to identify the optimum solution and to secure the consents required from persons with an interest in the additional land required for the alternative proposals (NMC-06). Whichever option is progressed, the detailed design will be developed in accordance with the design commitments, design principles and developed through the stakeholder consultation mechanism set out in section 4 of the OEMP [REP-011]. Compliance with these measures is secured through the revised OEMP and therefore English Heritage will continue to be able to influence the design development of the proposed PRoW.



Appendix 1 – Wiltshire Council - Existing Rights of Way



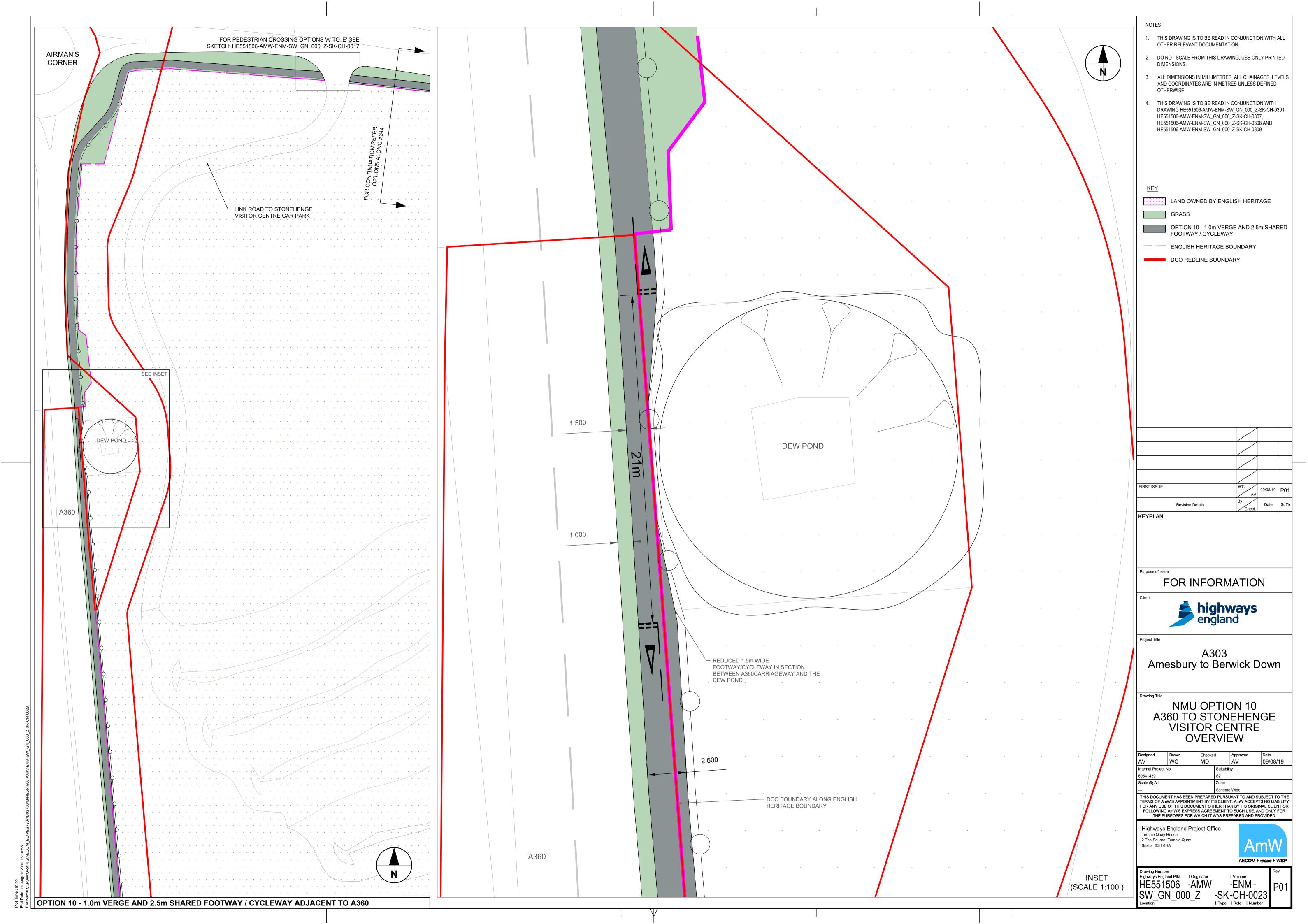


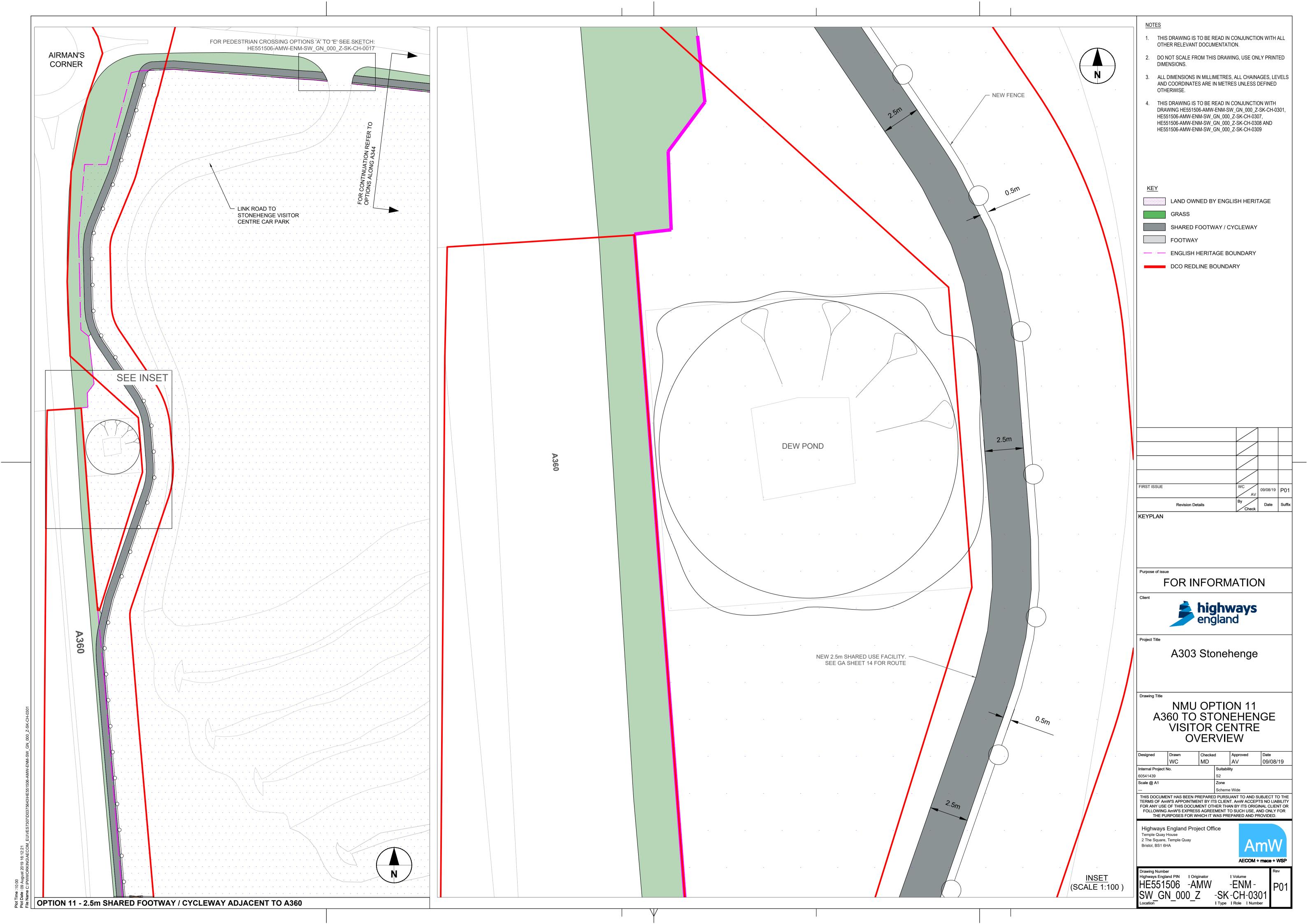
Appendix 2 - Record of Applicant's Engagement with EHT on PRoW to Visitor Centre

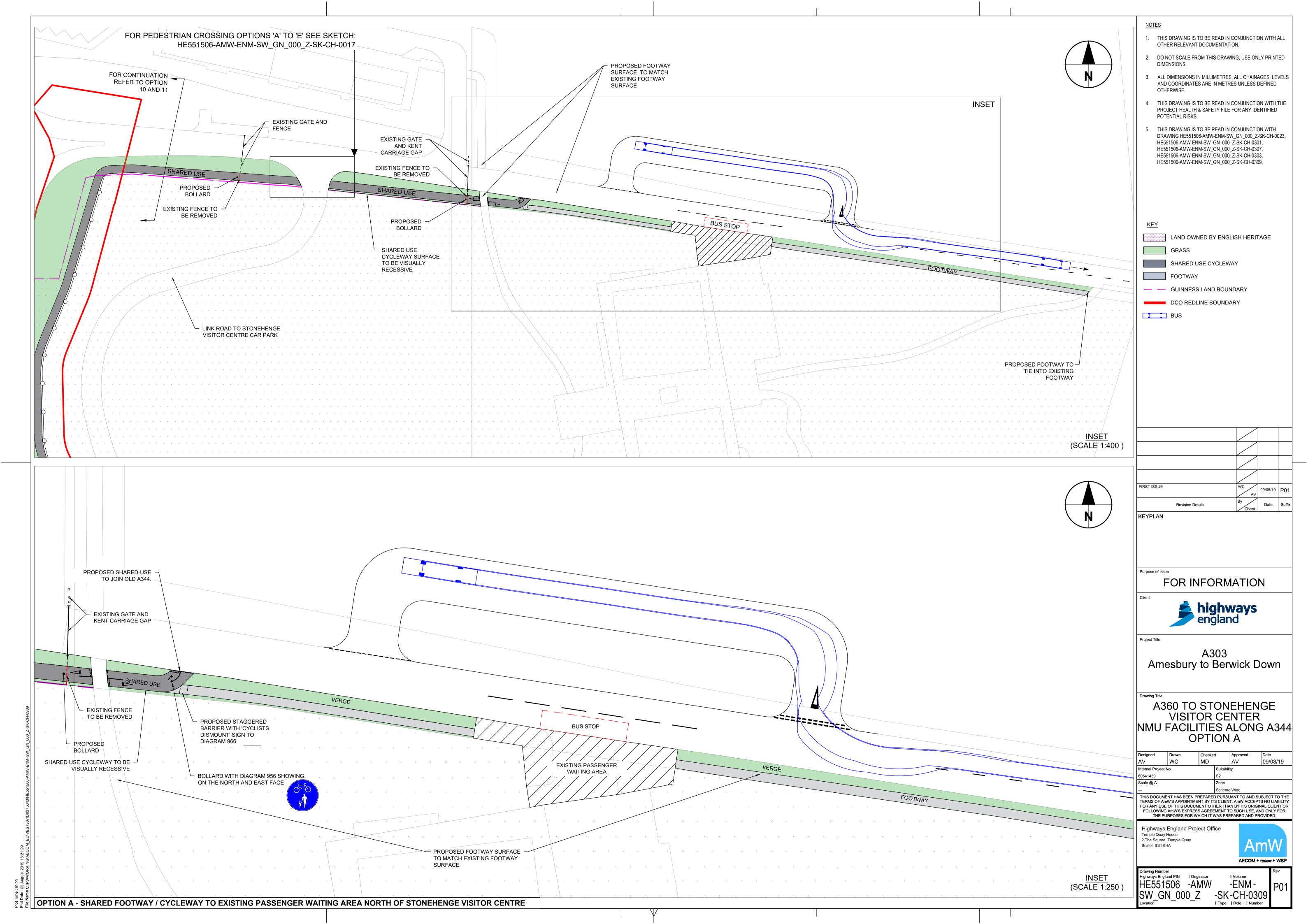
Date	Comment
July 2018	Supplementary consultation showing restricted byway to visitor centre
8 August 2018	Meeting with English Heritage. (Steve McQuade, HE email 14 Aug 2018, 16:13)
13 August 2018	English Heritage objects to restricted byway proposals to Visitor Centre as clarified at supplementary consultation
30 November 2018	Alternative Options 2 to 5 presented at meeting with English Heritage
20 February 2019	English Heritage provides comments on proposals (Kate Davies email sent 20 February 2019 10:35 refers)
26 March 2019	'Highways England, A360_VC-RB_presentation setting out updated alternatives presented at meeting with English Heritage in Bristol and issued for comment.
09 April 2019	Option 10 shared-use cycleway presented to Heritage Partners Meeting and details issued for comment
30 April 2019	Presentation to Heritage Partners design review, summarising current status of options development
9 May 2019	Tim Harper (Highways England Local Routes Lead) issues slides for consideration at meeting with English Heritage on 13 May 2019.
13 May 2019	English Heritage and Highways England meet to review progress on alternatives
11 June 2019	Tim Harper informed Kate Davies (Stonehenge Director, EHT) that Highways England continue to seek landowners' permission to secure an alternative route (Option 5)
18 June 2019	Option 10 – A344 arrangement discussions presented at meeting with English Heritage
24 June 2019	Option 10 plan issued for EHT review
28 June 2019	English Heritage provides comments on Option 10 – A344 arrangement proposals (Kate Logan email sent 28/06/2019 13:51)
	Tim Harper informs Kate Logan (Stonehenge Director, EHT) that the adjacent landowner rejects the alternative right of way to the east of the visitor centre.
10 July 2019	Meeting between Kate Logan and Tim Harper following CA Hearing to explore modifications which might be acceptable to EHT. Updated details to be issued to EHT.

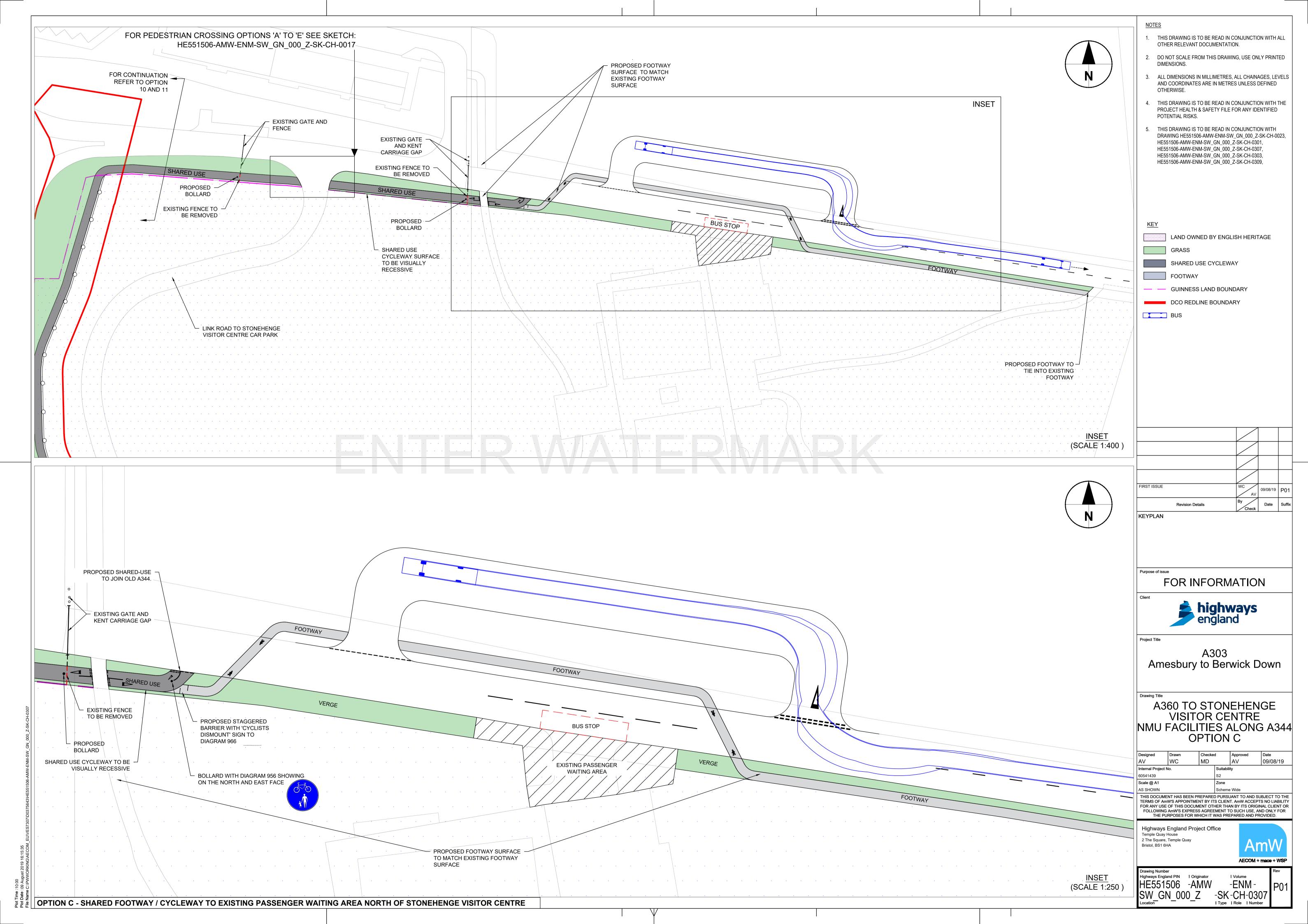


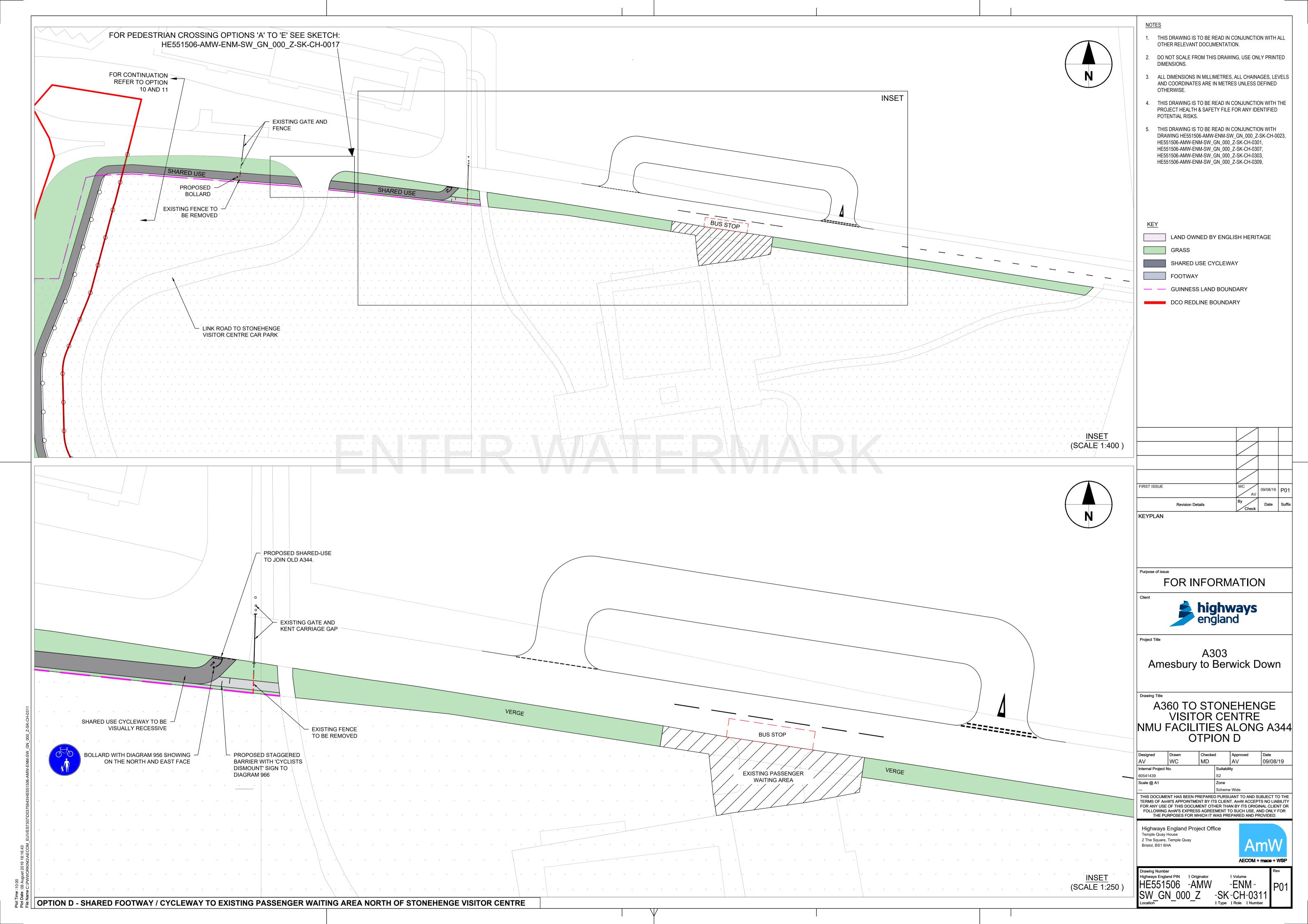
Appendix 3 – Alternative Proposals

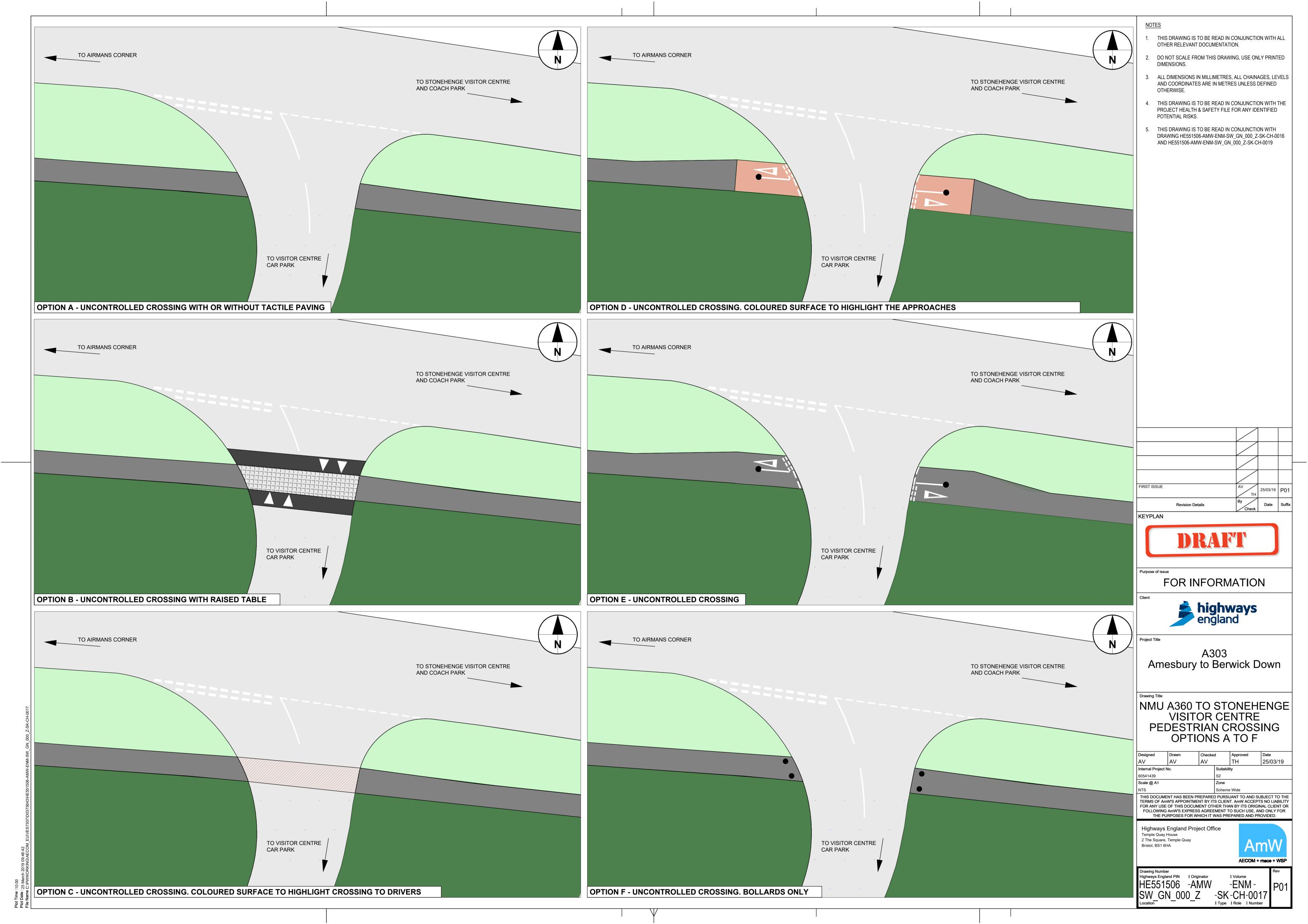














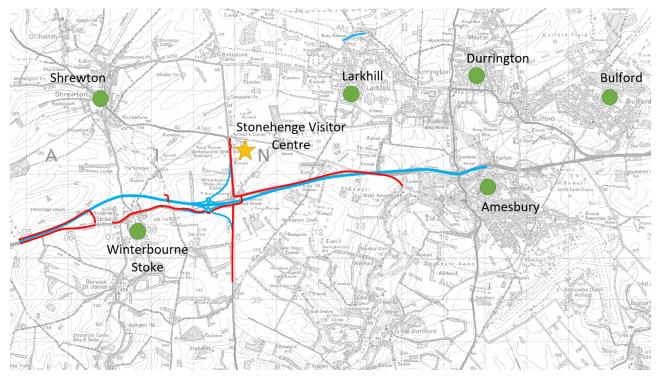
Appendix 4 – Car Park User Analysis

The car park provides a total of 494 spaces for cars and other vehicles. English Heritage advises that overflow parking is provided on the adjacent grassed areas for up to 80 days per year.

The maximum recorded hourly turning movement into the car park is 497 vehicles. i.e. 8 vehicles per minute or 1 vehicle every 7 seconds. The majority of pedestrians will accept a gap of 4-6 seconds at normal urban vehicle speeds to cross two lanes of traffic and even shorter gaps at slow vehicle approach speeds. Vehicles entering car park are expected to be bellow 20mph. Assuming that cars will tend to travel into the car park in platoons, there will be available periods of 7 seconds or more which will be adequate for small groups of pedestrians. Conservatively assuming only 4 people in line abreast cross at a time, providing a minimum crossing capacity of 20 per hour. It is expected that pedestrians using the crossing is likely to be no more than 20 at the peak hour. The number would be further reduced if EHT agreed to provide the permissive path through the visitor centre facilities, reducing the number of road users while the Visitor Centre is open, although this does not form part of the Applicant's proposals nor is it required to make the Applicant's proposals acceptable. The potential conflict, while recognised, is not considered to cause congestion at the car park entrance.

This demonstrates that the number of pedestrians and cyclists will not be sufficient to create delays to vehicles at the crossing during the busiest periods, resulting in no increase in congestion approaching the car park access road junction with the former A344.

The proposed route along the A360 may generate trips to the Stonehenge Visitor Centre. The majority of trips generated are expected to originate from residential areas. There is a total of five residential areas near Stonehenge: Amesbury, Larkhill, Durrington & Bulford, Shrewton and Winterbourne Stoke. Given the distances involved, routes will be more attractive to cyclists.



Map showing towns and villages near Stonehenge



Area	Population (Census 2011)	Population 2019 (estimated)
Amesbury	10116	11459 (+1.57% per year 2011>2019)
Larkhill	2358	2535 (+1.57% per year 2011>2019)
Durrington and Bulford	8556	10025 (+2% per year 2011>2019)
Shrewton	1723	1651 (-0.53% per year 2011>2019)
Winterbourne Stoke	205	205
Total	22,958	27,894

Population

AGE	Distribution Bulford, Shrewton and Winterbourne Stoke) 2019		Population (excluding Shrewton and Winterbourne Stoke) 2019	
Age 0 to 4	6%	1674	1562	
Age 5 to 9	5.80%	1618	1510	
Age 10 to14	6.20%	1729	1614	
Age 15 to 17	3.90%	1088	1015	
Age 18 to 24	7.50%	2092	1953	
Age 25 to 29	5.40%	1506	1406	
Age 30 to 44	19.40%	5411	5051	
Age 45 to 59	20.90%	5830	5442	
Age 60 to 64	6.60%	1841	1718	
Age 65 to 74	9.60%	2678	2500	
Age 75 to 84	6%	1674	1562	
Age 85 and over 2.50% Total		697	651	
		27894	26038	

Age distribution



It is unlikely that Shrewton and Winterbourne Stoke will generate trips to Stonehenge Visitor Centre by walking or cycling. There are no proposals to link existing PRoW in Shrewton with the Stonehenge Visitor Centre. Winterbourne Stoke population was 205 people, therefore it is unlikely to generate a significant number of users on the proposed shared-use cycleway at the Visitor Centre.

According to the Department for Transport's National Travel Survey 2017, on average 41.6% of people between the ages of 14-59 and 23% of people over 60 age have access to a bicycle. Assuming that people aged 0-15 and people aged over 75 would be unlikely to generate trips to the Stonehenge Visitor Centre by cycling, it is estimated that around 6600 people would have access to bicycles in those towns.

Age	Percentage of people with access to a bicycle (National Travel Survey 2017	People with access to a bicycle (excluding Winterbourne Stoke and Shrewton) 2019
Age 15-59	41.6%	5705
Age 60+	23%	895
To	otal people	6600

Percentage of people with access to a bicycle

Based on national statistics 1.1% of people cycle for leisure at least five times per week. The number of adults cycling for leisure in the Wiltshire area is estimated to be 73 cyclists.

Given that cycle trips from Amesbury and Durrington & Bulford require more than 30 minutes, the number of cyclists would be further reduced. National Statistics have shown that 63% of cyclists in the South West region mostly or always cycle for more than 30 minutes. That means that 46 cyclists will mostly cycle for more than 30 minutes.

Town/Village	Distance to SVC	Total time need to travel (walking)	Total time need to travel (cycling)
Amesbury	6+ miles (from Amesbury town centre)	1H 40mins	30+ mins
Larkhill	2.9 miles	50 mins	15 mins
Durrington and Bulford	5-7 miles	1H 40mins	30-50 mins
Shrewton	PRoW network will not be linked to SVC. Unlikely to generate trips.	-	-
Winterbourne Stoke	3.0 miles (via proposed PRoW network)	1H	20 mins

Distances to Stonehenge Visitor Centre

Assuming that trips using the proposed public rights of way network to the Stonehenge Visitor Centre will be mostly or always for recreational purposes (based on National statistics, 79% of cyclists mostly or always cycle for recreational purposes), the number of



potential cyclists interacting with a peak number of visitors by car will be further reduced to 36 cyclists.

Analysis of the traffic patterns around Stonehenge shows that traffic between 4pm and 5pm at weekends is 50% more than the traffic between 4pm and 5pm on a weekday. Considering the likelihood of more cyclists on a sunny weekend day it is estimated that the number of cyclists will be increased by approximately 50%. It is estimated that 54 cycle trips will be generated during a weekend from nearby areas. Distributing 54 cycle trips throughout a day, it is estimated that 5-6 cyclists may interact with the Visitor Centre car park access road during the peak time. That is a maximum of 2 cyclists every 15 mins during the peak time. This demonstrates that the additional number of cyclists will not be sufficient to create delays to vehicles at the crossing during the busiest periods.



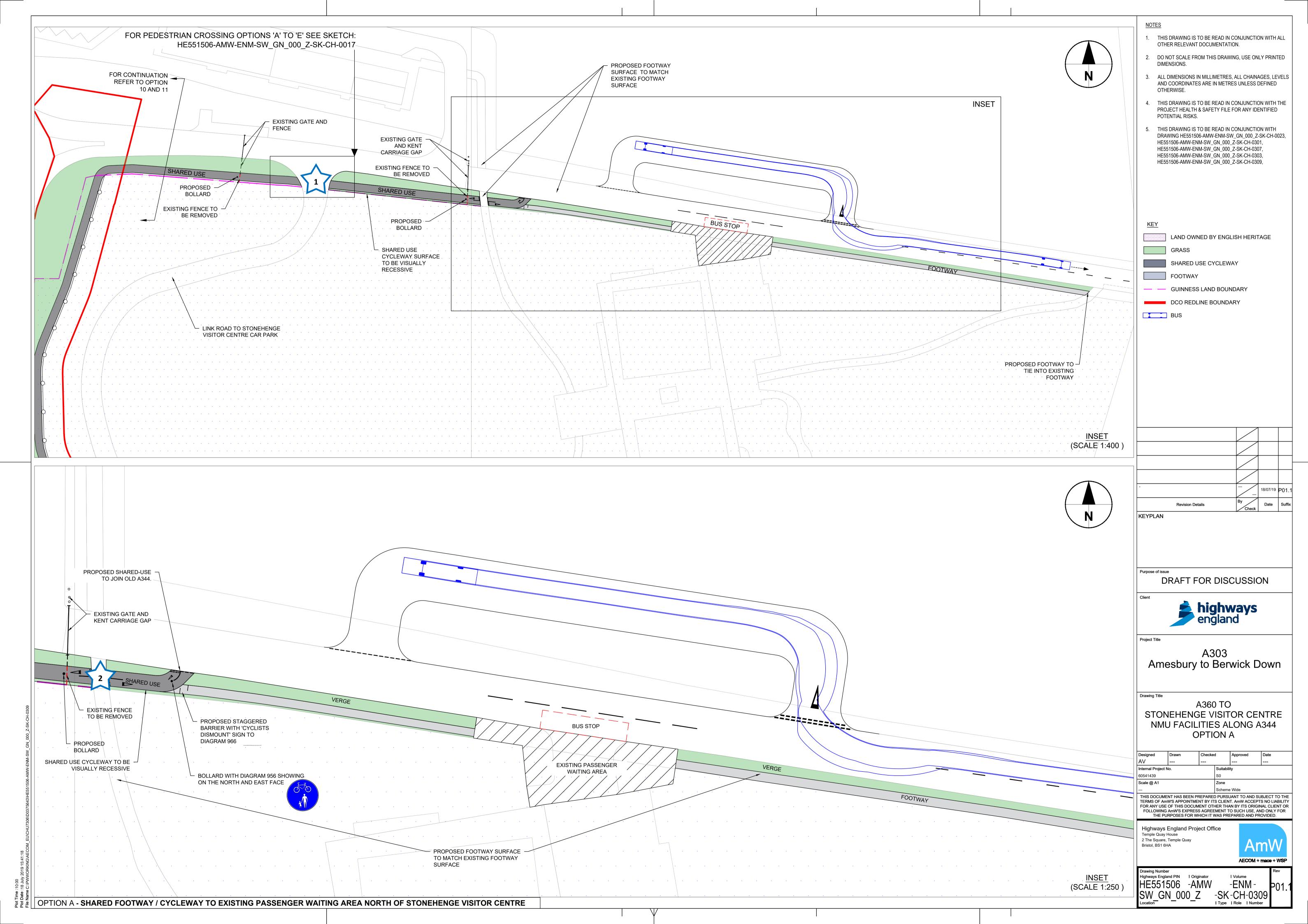
Appendix 5 – Risk assessment for NMU options along A344

Activity/Decision		Risk Assessment for NMU facilities along A344 - Option A			Date : 24/07/19				
	Assessor	Shaun Joyce							
REF	Hazard/Risk description	Risk Assessment pre- mitigation		ore-	Response Control Measure	Risk Assessment with mitigation		/ith	Details/Assumptions/Monitoring
		L	S	R		L	s	R	
1	Conflict point 1 - Risk of collision at Visitor Centre access. Proposed NMU crossing of the Visitor Centre access is within the bell-mouth section of the junction where crossing lengths are at their maximum. There is no centre island to allow NMUs to cross in two phases, increasing the length of time the NMUs will be in the carriageway and exposed to traffic.	Likely	Moderate	8	 Inclusion of central crossing island Options of - Give way markings, raised table, coloured surfacing Ensure good visibility Possible speed reducing features (if required) 	May happen	Moderate	6	Pedestrian crossing of Visitor Centre car park access. Options A to E sketch HE551506-AMW- ENM-SW_GN_000_Z-SK-CH- 0017
2	Conflict point 2 - Risk of pedestrian and cyclist collision. Proposed shared footway/cycleway crosses visitor centre route to/from coach parking.	May happen	Moderate	6	 Bollard located prior to crossing to reduce cyclist speeds Give way markings to highlight crossing priorities Ensure adequate inter-visibility (keeping grass cut low and avoid signage within visibility splays) Cycle warning signs 	Unlikely	Moderate	4	

Risk Matrix:

Table D.1 Risk value, likelihood and severity of outcomes that may be assigned to qualitative data for the purposes of assessment

Likelihood (L) x Severity (S) = Risk value (R)		Severity (S)							
		Minor harm; Minor damage or loss no injury	Moderate harm; Slight injury or illness, moderate damage or loss	Serious harm; Serious injury or ill- ness, substantial damage or loss	Major harm; Fatal injury, major damage or loss	Extreme harm; Multiple fatalities, extreme loss or damage			
	Very unlikely; Highly improbable, not known to occur	1	2	3	4	5			
	Unlikely; Less than 1 per 10 years	2	4	6	8	10			
Likelihood (L)	May happen; Once every 5-10 years	3	6	9	12	15			
	Likely; Once every 1- 4 years	4	8	12	16	20			
	Almost certain; Once a year or more	5	10	15	20	25			
Risk Value (R)		Required action							
Low (1-9)		Ensure assumed control measures are maintained and reviewed as necessary.							
Medium (10-19)		Additional control measures needed to reduce risk rating to a level which is equivalent to a test of "reasonably required" for the population concerned.							
High (20-25)		Activity not permitted. Hazard to be avoided or risk to be reduced to tolerable.							



	Activity/Decision		essment for N	MU fac	ilities along A344 - Option C	Date: 24/07/19			
	Assessor	Shaun Jo	Shaun Joyce						
REF	Hazard/Risk description	description Risk Assessment pre- mitigation Response Control Measure Risk Assessment with		/ith	Details/Assumptions/Monitoring				
		L	s	R		L	s	R	
1	Conflict point 1 - Risk of collision at Visitor Centre access. Proposed NMU crossing of the Visitor Centre access is within the bell-mouth section of the junction where crossing lengths are at their maximum. There is no centre island to allow NMUs to cross in two phases, increasing the length of time the NMUs will be in the carriageway and exposed to traffic.	Likely	Moderate	8	 Inclusion of central crossing island Options of - Give way markings, raised table, coloured surfacing Ensure good visibility Possible speed reducing features (if required) 	May happen	Moderate	6	Pedestrian crossing of Visitor Centre car park access. Options A to E sketch HE551506-AMW- ENM-SW_GN_000_Z-SK-CH- 0017
2	Conflict point 2 - Risk of pedestrian and cyclist collision. Proposed shared footway/cycleway crosses visitor centre route to/from coach parking.	May happen	Moderate	6	 Bollard located prior to crossing to reduce cyclist speeds Give way markings to highlight crossing priorities Ensure adequate inter-visibility (keeping grass cut low and avoid signage within visibility splays) Cycle warning signs 	Unlikely	Moderate	4	

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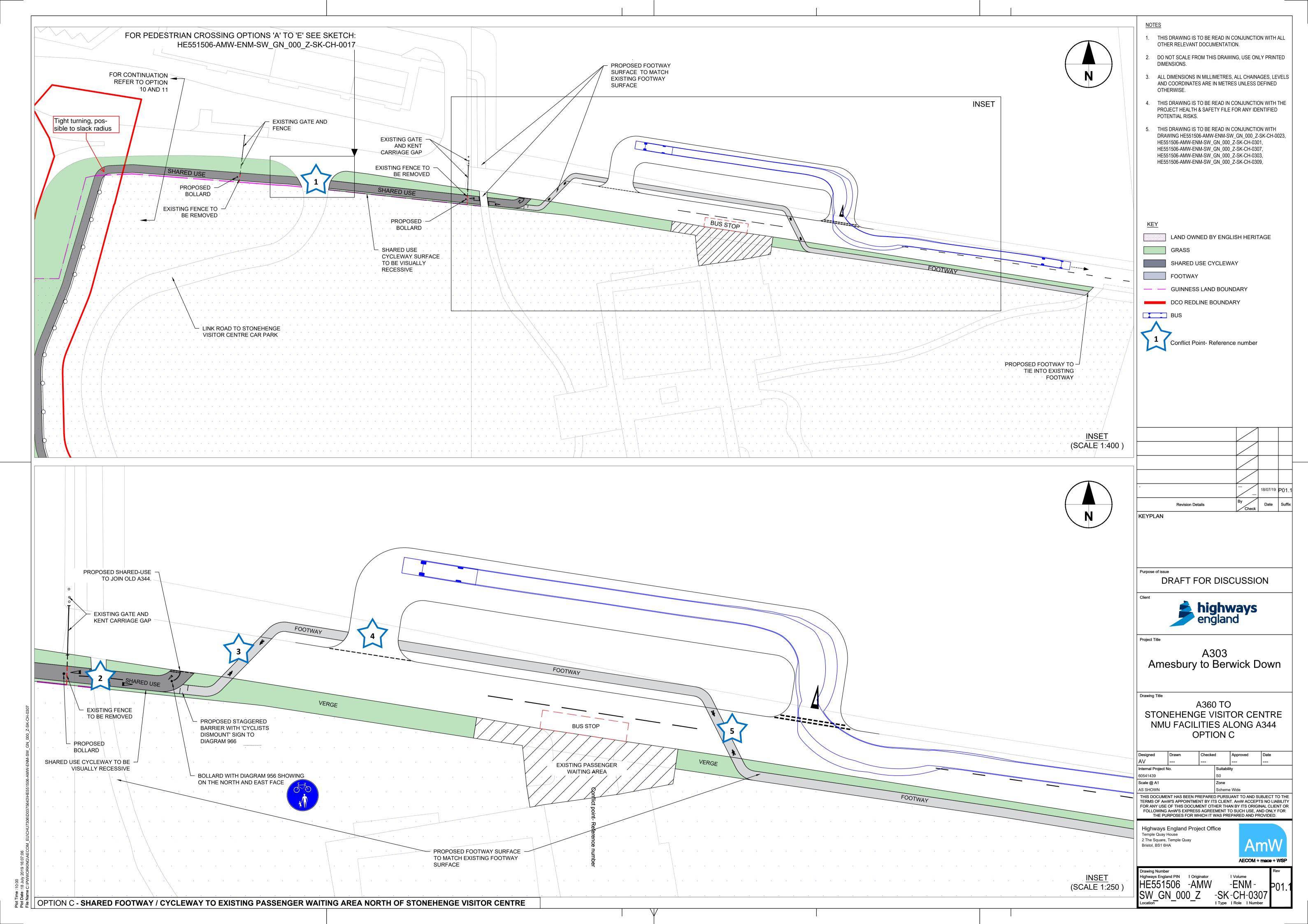
Final ADS Position - Gantry G10-03

3	Conflict 3 - Risk of pedestrian collision with cyclist. Increased risk where proposed footway crosses old A344.	Unlikely	Moderate	4	 Dedicated marked route for pedestrians Potential zebra crossing to give pedestrians priority 	Very unlikely	Moderate	2	Likely conflict with vehicles considered low, due to Kent Carriage Gap and highway restrictions on A344 Possible switch of pedestrian/cycle crossing Crossing unlikely to be used due to pedestrian desire lines
4	Conflict 4 – Risk of pedestrian and bus collision. Increased risk where proposed footway crosses access point for Stonehenge buses	Unlikely	Moderate	4	Potential zebra crossing to give pedestrians priority on junction	Very unlikely	Moderate	2	No additional control measures currently proposed
5	Conflict 5 — Risk of pedestrian collision with bus/cyclist. Increased risk where proposed footway crosses old A344.	Unlikely	Moderate	4	 Dedicated marked route for pedestrians Potential zebra crossing to give pedestrians priority 	Very unlikely	Moderate	2	

Risk Matrix:

Table D.1 Risk value, likelihood and severity of outcomes that may be assigned to qualitative data for the purposes of assessment

		Severity (S)								
Likelihood (L value (R)) x Severity (S) = Risk			Major harm; Fatal injury, major damage or loss	Extreme harm; Multiple fatalities, extreme loss or damage					
	Very unlikely; Highly improbable, not known to occur	1	2	3	4	5				
	Unlikely; Less than 1 per 10 years	2	4	6	8	10				
(L)	May happen; Once every 5-10 years	3	6	9	12	15				
	Likely; Once every 1- 4 years	4	8	12	16	20				
	Almost certain; Once a year or more	5	10	15	20	25				
Risk Value (R	2)	Required action								
Low (1-9)		Ensure assumed control measures are maintained and reviewed as necessary.								
Medium (10-19)		Additional control measures needed to reduce risk rating to a level which is equivalent to a test of "reasonably required" for the population concerned.								
High (20-25)		Activity not permitted. Hazard to be avoided or risk to be reduced to tolerable.								

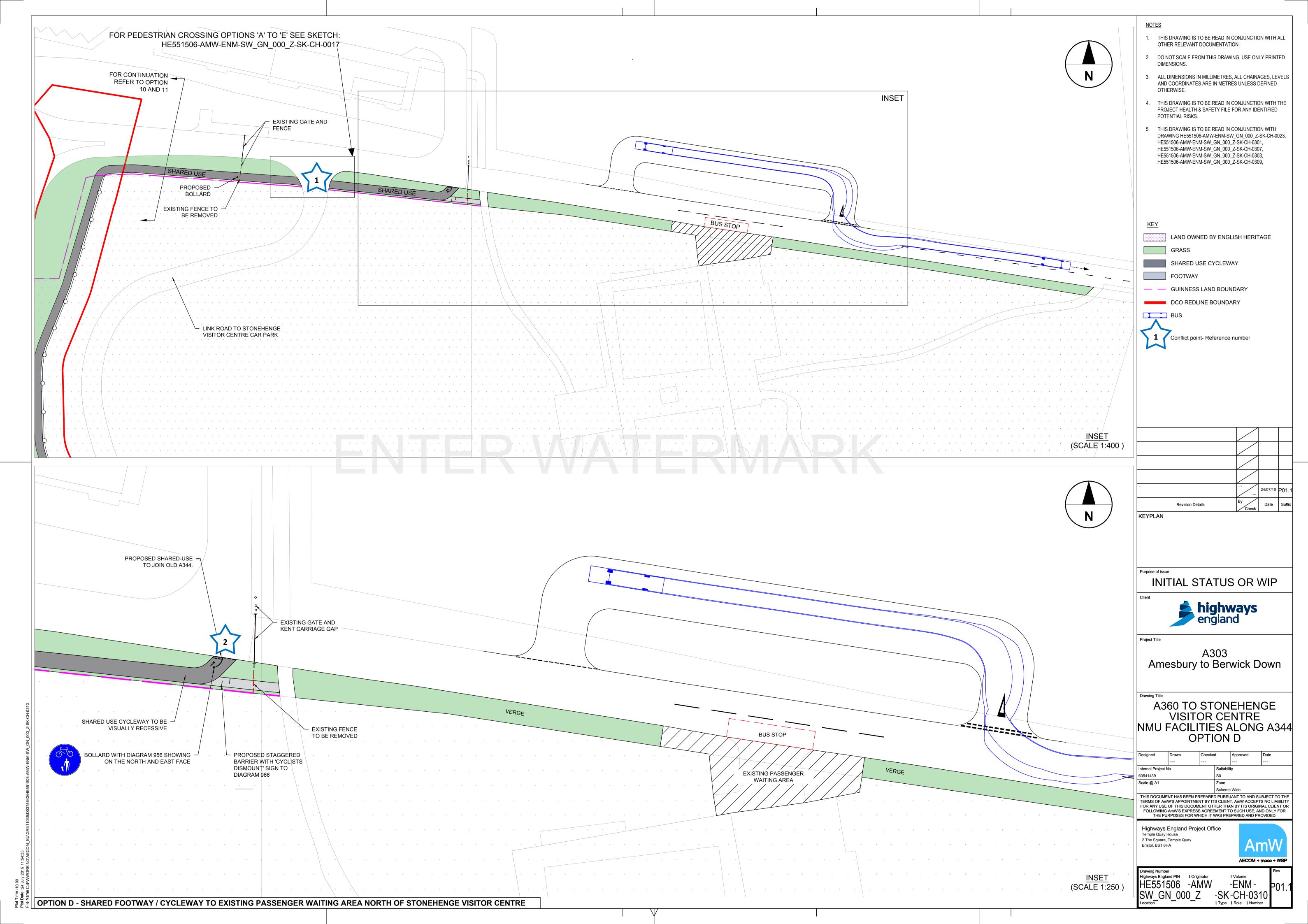


	Activity/Decision	Risk Assessment for NMU facilities along A344 - Option D					Date: 24/07/19			
	Assessor	Shaun Jo	Shaun Joyce							
REF	Hazard/Risk description	Risk Assessment pre- mitigation		ore-	Response Control Measure	Risk Assessment with mitigation			Details/Assumptions/Monitoring	
		L	S	R		L	s	R		
1	Conflict point 1 - Risk of collision at Visitor Centre access. Proposed NMU crossing of the visitor centre access is within the bell-mouth section of the junction where crossing lengths are at their maximum. There is no centre island to allow NMUs to cross in two phases, increasing the length of time the NMUs will be in the carriageway and exposed to traffic.	Likely	Moderate	8	 Inclusion of central crossing island Options of - Give way markings, raised table, coloured surfacing Ensure good visibility Possible speed reducing features (if required) 	May happen	Moderate	6	Pedestrian crossing of Visitor Centre car park access. Options A to E sketch HE551506-AMW- ENM-SW_GN_000_Z-SK-CH- 0017	
2	Conflict point 2 - Risk of cyclist and vehicle collision. Increased risk due to cycleway crossing old A344 near access point for coaches. Cyclists unlikely to use new link east of Visitor Centre access thus creating further conflict with road users.	May happen	Moderate	6	 Bollard located prior to crossing to reduce cyclist speeds Give way markings to highlight crossing priorities Possible warning signs (if required) 	Unlikely	Moderate	4	Control measures considered unlikely to significantly improve user safety	

Risk Matrix:

Table D.1 Risk value, likelihood and severity of outcomes that may be assigned to qualitative data for the purposes of assessment

		Severity (S)								
Likelihood (L value (R)) x Severity (S) = Risk	Minor harm; Minor damage or loss no injury	Minor damage or Slight injury or Serious injury or ill- Fatal injury, n		Major harm; Fatal injury, major damage or loss	Extreme harm; Multiple fatalities, extreme loss or damage				
	Very unlikely; Highly improbable, not known to occur	1	2	3	4	5				
	Unlikely; Less than 1 per 10 years	2	4	6	8	10				
Likelihood (L)	May happen; Once every 5-10 years	3	6	9	12	15				
	Likely; Once every 1- 4 years	4	8	12	16	20				
	Almost certain; Once a year or more	5	10	15	20	25				
Risk Value (R	2)	Required action								
Low (1-9)		Ensure assumed control measures are maintained and reviewed as necessary.								
Medium (10-1	9)	Additional control measures needed to reduce risk rating to a level which is equivalent to a test of "reasonably required" for the population concerned.								
High (20-25)		Activity not permitted. Hazard to be avoided or risk to be reduced to tolerable.								





Appendix 6 – Road Safety Auditor Comment

A303 Stonehenge

Project:	A303 Stonehenge							
Title:	Road Safety comr provided by EHT	ment on '	Health & S	afety state	ement'			
Date:	10 May 2019	Version:	P01	Status:	S0			

Revision	Date	Prepared by	
-	10 May 2019	Andrew	
	-	Davison	

1 Introduction

- 1.1 As part of the A303 scheme, Highways England (HE) explores proposals for Non-Motorised Users (NMU) routes alongside the A360 between the existing Longbarrow Roundabout and the Stonehenge visitors centre.
- 1.2 English Heritage has prepared a Health & Safety statement (Appendix 3 of the Written Representations submitted at Deadline 2) for the examination of HE application of the Development Consent Order (DCO) objecting to the section of the proposed NMU route running alongside the A360.
- 1.3 This technical note has been prepared by a Road Safety Auditor and responds to 'Appendix 3: Stonehenge A360 Public Right of Way Health & Safety Statement' of the Written Representations submitted at Deadline 2 by English Heritage.

2 Comments to English Heritage's Health & Safety statement

2.1 Comments to English Heritage statement as follows:

1 Introduction

1.1 Any route that takes members of the public through the site poses a significant health and safety risk due to number of visitors and vehicles

Road Safety Auditor's comment:

In all options Non-Motorised Users routes are provided with a facility which is segregated from vehicular traffic. The main conflict point is the crossing of the car park entrance in the proposals along the C506 (A344).

1.2 Prosecutions by the Health & Safety Executive (HSE)

Road Safety Auditor's comment:

Prosecutions by HSE would only happen in a workplace environment (i.e. where an employee or member of public was injured as a result of

A303 Stonehenge

working practices). The most likely type of collision that could occur in this situation would be between a motorist and a NMU or other motorists in private vehicles. Provided that the road layout had been designed in accordance with current standards and best practice, it is very unlikely that the HSE would be involved in such incidents.

2. Significant Hazards

2.1 Member of the public being struck by a vehicle on site

EHT's concern is that if the NMU's cut through the car park there is an increased risk of collision between the NMU's and vehicles. EHT stated that there were incidents of people climbing fences to access areas of the site creating desire lines.

Road Safety Auditor's comment:

The proposed scheme does not include a PRoW across the car park and the boundary will be secured by fencing (Note: Option C does include a private gated pedestrian access in the south western corner of the site that would be controlled by EHT). It is recognised that some unauthorised incursions may result from pedestrians climbing over the fence, with EHT reporting 12 such incidents in the previous 2 years.

One possible explanation for these incursions is that there is currently no formal provision for pedestrians along the A360, therefore cutting across the car park would represent the safer and more attractive route to follow. Whilst the new path will increase the number of NMU's travelling along the A360, it cannot be concluded that there will be a pro-rata increase in incursions.

The level of reported incursions (6 per year) is extremely low compared to the total number of people using the car park legitimately. Even if incursions were increased following the introduction of the path, these would represent a small fraction of visitor accesing the site, which can rise to several thousand per day at peak times. Furthermore, the route taken across the car park, by people who have climbed over the fence, will be the same as for those who have parked legitimately.

Examples from different sites shows that the likelihood of a pedestrian collision occuring is quite low. Most car parks at supermarkets or motorway service stations have few pedestrians facilities while there is a higher level of usage.

Any resultant collision between a vehicle and a pedestrian is unlikely to result in a fatality or serious injury. Vehicle speeds are likely to be well below 20mph – research shows that at 20mph the risk of a fatality is ~5%, so the figure is expected to be further lower.

$\underline{\text{2.2 Member of the public/staff member being struck by a bicycle/carriage on }}$

This is understood to refer to collisions between members of the public and the NMU users with a risk for violence and aggression to EH staff if they

A303 Stonehenge

have to intervene. Any changes to the existing facilities on the site due to the proposals would have to be considered in the context an ongoing security improvement approach in partnership with the Wiltshire Counter Terrorism Unit.

Road Safety Auditor's comment:

As previously stated there are no plans for an unsegregated PRoW through the visitor centre car park. In all options Non-Motorised Users routes are provided with a facility which is segregated from vehicular traffic.

Since this problems relates to collisions between cyclists and pedestrians, the likelihood and severity of this hazard will be lower than the previous hazard (2.1) due to there being fewer cyclists travelling at lower speeds compared to other vehicles. No details of the aggressive incidents have been provided – possible staff training may assist here.

In regards to the terrorist / security concerns, details have not been articulated by EHT however it is not envisaged that the proposed scheme would have any significant impact on the current situation.

2.3 Member of the public/staff member being struck by a vehicle on the A344/A360

EHT are concerned that an EH trained first aider would be the first responder to an incident nearby. Attending an accident could put EH first aider at serious risk of a vehicle collition.

Road Safety Auditor's comment:

It is not clear how the proposals will impact on the arrangements currently in place. By removing cyclists and pedestrians from the A360 the likelihood of such a situation arising will be reduced.

If this is considered to be a hazardous operation then the employer must undertake a risk assessment and provide suitable mitigation measures and procedures. If the incident occurs within EH's boundary then this could include closing off the road with cones/barriers, hi-viz PPE.

2.4 Member of the public falling on the route (east of visitor centre)

The provison of a footway around the perimeter of the site may encourage pedestrians to access the grass field further to the east. The field is uneven and could lead to slips, trips and falls.

Road Safety Auditor's comment:

The option for a PRoW around the perimeter of the site has been withdrawn.

The nature of the PRoW that was previously proposed was entirely consistant with the vast majority of rural PRoW's throughout the UK. The field could be fenced or signs provided warning of the risk. Anyone tripping or falling in the field are most likely to require minor first aid rather than having significant time off work.

A303 Stonehenge

3. Conclusion

EHT raised concerns that any PRoW or unauthorised incusions through the site poses a significant health and safety risk to staff, members of the public and visitors. EHT stated that the introduction of an NMU facility through the site would require additional supervision and interventions like signage and barriers/fences within the World Heritage area. Policing the PRoW would be problematic and it is likely to increase violence against staff leading to staff stress and well-being issues.

Road Safety Auditor's comment:

The proposed scheme does not include an unsegregated an unsegregated PRoW through the visitor centre car park. In all options Non-Motorised Users routes are provided with a facility which is segregated from vehicular traffic.

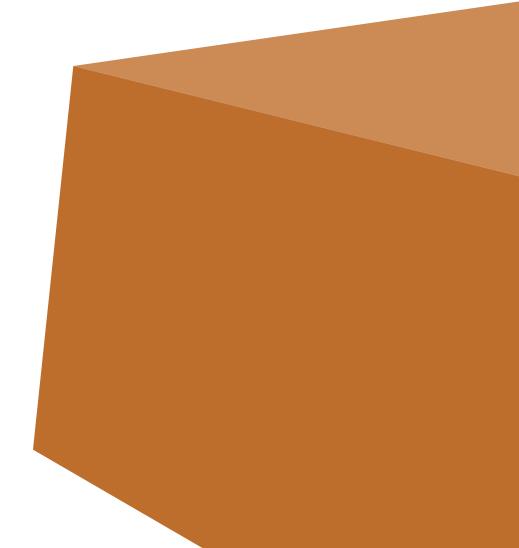
It is not accepted that the number of illegal incursions will increase significantly following the introduction of the path along the A360. If a pedestrian access to the visitor is to be provided by EH in the south western corner of the site then measures could be put in place to control entry as well as safely manage pedestrian routes through the site.

Overall the risks to people gaining access through the site would not be significantly increased by the presence of the path. It is also considered that the risks to anyone entering the site from the new path would be no different than for those conventionally accessing the car park.

It would appear from the scoring criteria accompying the risk assessments that the Risk Ratings have been based on the absolute worst case scenario rather than the most probable outcomes. Standard best practice for completing risk assessments requires the most likely outcomes to be used.

The statement makes no recognition of the comparative safety issues associated with the existing arrangement whereby it is presumed that pedestrians are required to walk on the verge and with cyclists in the carriageway.

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