



# Department for Digital, Culture Media & Sport

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02 October 2019

To whom it may concern,

The Department for Digital, Culture, Media and Sport (DCMS) submits the following representation regarding the application by Highways England under the Planning Act 2008, for a development consent order (“DCO”) for the A303 Amesbury to Berwick Down Scheme (“the Scheme”).

This representation is made under DCMS’s role as the UK State Party to the World Heritage Convention, following on from previous representations made to the examining authority specifically regarding the impact on the World Heritage site, most recently at Issue Specific Hearing 8 held on 21 August 2019.

The extensive work which has been undertaken by the planning authority and other relevant parties into the application and examination highlights the universal significance of this site and the importance of its continued protection. DCMS agrees that the project represents a unique opportunity to improve the ability to experience the World Heritage Site, while recognising the need to ensure the protection, conservation, presentation and transmission to future generations as required by the Convention.

As noted in our previous representations, the World Heritage Committee responded to the State of Conservation report submitted by DCMS as a requirement of the World Heritage Convention during its meeting in June/July 2019. DCMS will need to respond to this decision by 1 February 2020.

As set out in our representations to the hearing, in DCMS’s view, the suggestion made by the Committee that the project “should not proceed with the upgrade in its current form and that the length of the tunnel should be extended so that the western portal is located

outside the World Heritage Site” does not fully consider the balance that needs to be struck between all relevant considerations including heritage, public benefit and overall affordability, as set out in ICOMOS guidelines for Heritage Impact Assessment [2-1-5; 6-2].

The overall impact of the scheme will be of benefit to the Outstanding Universal Value (OUV) of the site, primarily through the removal of the existing harmful road bisecting the site. While there remain some detailed considerations regarding archaeology and design which will require continued input and heritage expertise, in our view the scheme is in compliance with the World Heritage Convention.

Sincerely,

A solid black rectangular box redacting the signature of Giles Smith.

Giles Smith  
Deputy Director for Heritage Tourism and Cultural Diplomacy