



**WRITTEN REPRESENTATIONS OF THE HISTORIC BUILDINGS AND MONUMENTS  
COMMISSION FOR ENGLAND (HISTORIC ENGLAND)**

**APPLICATION BY SOLARFIVE LTD**

**FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE: BOTLEY WEST  
SOLAR FARM**

**APPLICATION REF: EN010147**

**OUR REFERENCE: PL00794649**

**DEADLINE 2 SUBMISSION: 4<sup>TH</sup> JUNE 2025**

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## Introduction

- 1.1. The Historic Buildings and Monuments Commission for England is generally known as Historic England, and we are the Government's principal statutory adviser on all aspects of the historic environment in England and the lead body for the heritage sector. We have a duty to secure and promote conservation, public understanding and enjoyment of the historic environment. Historic England's sponsoring ministry is the Department for Culture, Media and Sport (DCMS). Historic England also has a role advising Government in relation to World Heritage Sites and implementation of the 1972 UNESCO Convention concerning the Protection of the World Cultural and Natural Heritage (1972 Convention).
  - 1.2. The development would be for the construction, operation and decommissioning of the Botley West Solar Farm. This is a large-scale solar project set across the West Oxfordshire, Cherwell and the Vale of White Horse Districts, with associated infrastructure for connection between these sites and the national grid, via a new National Grid Substation at Botley West.
  - 1.3. As stated in our Section 56 Relevant Representations (February 2025) we recognise the importance of projects like this for the generation of sustainable energy, and we do not object in principle to the current proposals. The Scheme does however lie in a highly sensitive area for the historic environment and the focus of our advice was on the potential impacts on a World Heritage Site, a scheduled monument and a Registered Park and Garden (RPG) as well as highly graded listed buildings.
  - 1.4. The historic environment is an important consideration in relation to this Examination. The applicant has provided a full Environmental Statement (ES) with a Historic Environment chapter (Chapter 7). The World Heritage component of the application has been assessed under a Heritage Impact Assessment (Appendix 7.4). The appendices also include a heritage related Settings Assessment (Appendix 7.5) and geophysical survey reports (Appendix 7.3). The figures include some heritage specific visualisations (ES 6.4 Figures 8.248 to 8.371).
  - 1.5. The focus of Historic England's advice is on those highly designated heritage assets with the potential to experience significant effects. We focus primarily on:
    - Blenheim Palace World Heritage Site (NHLE 1000091) and associated Registered Park and Garden (Grade I: NHLE 1000434) and grade I listed Blenheim Palace (NHLE 1052912).
    - Scheduled Monument The Roman Villa (NHLE 1006346)
    - Grade I listed Churches of St Peter and St Paul, Church Hanborough (NHLE 1052991) and St Peter's, Cassington NHLE 1367949)
    - Grade II\* listed Church of St Michael, Begbroke (NHLE 1291232).
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- 1.6. The list entries for these assets as found on the National Heritage List for England can be found in Appendix 1.
- 1.7. We would expect that consideration of implications for grade II buildings, non-designated sites, conservation areas and undesignated archaeological matters will be provided by the Local Planning Authorities' (LPA) heritage, landscape, conservation and archaeological advisers in this regard, including the County archaeologist.
- 1.8. Historic England's representation below seeks to set out the role Historic England has had to date in this Examination, before setting out our assessment of the development's impact on highly designated heritage assets and commenting on what additional information we consider should be requested from the applicant to help ensure the impacts of the scheme on the historic environment are fully captured, assessed and minimised.

## **2. The Role of Historic England**

### *Advisor in relation to the historic environment*

- 2.1. Historic England is a statutory consultee on all Nationally Significant Infrastructure Projects.
  - 2.2. In light of this role as a statutory consultee, Historic England encourages pre-application discussions and early engagement on DCO projects to ensure informed consideration of heritage assets and to ensure that the potential for impacts on the historic environment is taken into account.
  - 2.3. In undertaking pre-application discussions for nationally significant infrastructure schemes, the key matters for Historic England in relation to the historic environment are ensuring that:
    - (a) the significance of heritage assets that may be affected is fully understood;
    - (b) the potential impact on that significance as a result of the proposed development is fully understood and assessed;
    - (c) any proposals to avoid, or mitigate that impact have been considered and can be secured; and
    - (d) the decision-maker is thereby fully informed of the considerations relating to those elements of the historic environment our advice covers, and can give appropriate weight to these in the balancing exercise. Considerable importance and weight should be given to preserving all heritage assets (the more important the asset, the greater the weight should be). Any harm to the significance of a designated heritage asset should require clear and convincing justification [NPS EN-1 5.9.28]. If the harm to the significance of the designated
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heritage asset is less than substantial, the harm should be weighed against the public benefits of the proposals [NPS EN-1 5.9.32].

#### *Advisor to the State Party*

- 2.4. As part of Historic England's role as statutory advisor to DCMS, on all aspects of the historic environment of England, we provide advice to DCMS in its capacity representing the UK State Party to the World Heritage Convention on how best it can meet its responsibilities under the articles of the Convention. Historic England not only provides advice to DCMS on the implementation of the Convention but also assists DCMS, in its State Party role, in liaising with individual World Heritage properties.

### **3. Relevant Background to this DCO**

#### *Pre-Application Engagement with the Applicant*

- 3.1. Prior to and following Historic England's PEIR response, we have been engaged in productive pre-application discussions with the applicants. As part of that engagement, we have worked closely and constructively with the applicants to review iterations of the HIA, ensure the impacts are fully understood and seek solutions that avoid the identified harm.
- 3.2. Our advice has recommended that the Heritage Impact Assessment (HIA) for the World Heritage Site needed further work to inform the EIA conclusions on the magnitude of impact. This included the production of a Sensitivity Heat Map, which has been provided (Figure 1.3 EN010147/APP/6.5). We also advised on the need for further visualisations and a requirement for archaeological evaluation following geophysical survey to support a better understanding of the impact of the proposals. Historic England has also worked closely with the applicant to ensure the HIA is revised and strengthened specifically with reference to guidance from UNESCO.
- 3.3. The additional work we have recommended remains ongoing, and we welcome the positive engagement we have had with the applicants in this respect; we are confident that amendments are capable of being made to the scheme which would largely address the issues we have raised.
- 3.4. Historic England has made its own assessment of the contribution the application site makes to the significance and OUV of Blenheim Palace World Heritage Site (WHS). On this basis we have identified areas where we consider panels would cause harm to this internationally recognised and important site and should be removed to avoid harmful impacts.
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3.5. We considered that whilst the majority of the scheme would not harm the OUV of the WHS, land parcels 2.1, 2.2, 2.5 and 2.20-2.26 of the central section of the Botley West Solar Farm would do so. This is because these land parcels do contribute to the maintenance of Blenheim's OUV as these fields are locations in which the Blenheim ensemble can be appreciated from open countryside. Solar array development in these fields would therefore detract from the contribution made by the setting of Blenheim, in a way that would harm its Outstanding Universal Value. We therefore recommended the removal of panels from these parcels.

3.6. Historic England's position was informed by The Historic England Advisory Committee (<https://historicengland.org.uk/about/who-we-are/committees-and-panels/historic-england-advisory-committee/>), who offer expert advice to staff and the Historic England Commission on Historic England's functions on policy matters and casework.

#### *International Council of Monuments and Sites (ICOMOS) Advice*

3.7. In accordance with its responsibilities under the 1972 Convention, the State Party originally notified the UNESCO World Heritage Centre regarding these proposals under paragraph 172 of the *Operational Guidelines* on 21 December 2023, having earlier submitted information under paragraph 174 on 13 October 2023. That information was reviewed by the International Council of Monuments and Sites (ICOMOS International - the cultural heritage advisor to the World Heritage Committee). The State Party received ICOMOS' Technical Review report of the development from the World Heritage Centre on 4 March 2024.

3.8. This Technical Review report was shared with the applicant via Historic England. In summary, ICOMOS advised that:

- it had concerns regarding the maintenance of the property's OUV as a result of this proposal within its setting.
- the proposal would lead to a large change in landscape character of the setting of the property (from rural to semi-industrial) if implemented which may have an impact on the maintenance of its OUV.
- the proposal would likely have an adverse impact on the OUV of the property and advised that alternative locations be considered to avoid those negative impacts.

3.9. Alongside the Botley West Technical Review, the State Party also received a Technical Review from ICOMOS titled *Urban expansion in the setting of the property*. This primarily responded to urban housing developments in and around Woodstock, but these schemes were also considered in the context of the Botley West scheme coming forward. In summary ICOMOS concluded that;

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- As set out in the Setting Study attached to the WHS Management Plan, views are an important attribute of the Outstanding Universal Value of the property specifically as they were fundamental to the placement and design of the palace and landscape.
- the property has a limited inter-visibility with its wider setting. However, reducing the setting of the property only to views inside the property and views outward from the property would underrepresent the contribution of the setting towards the maintenance of the Outstanding Universal Value of the property.
- the fundamental understanding of the contribution of the setting of the property to its Outstanding Universal Value was not shared across the board by all stakeholders in the management of the property and that the current protection and management system for the setting of the property is not adequate to withstand development pressures in its setting that may affect its Outstanding Universal Value.

3.10. Following the recent acceptance of this DCO, the State Party notified UNESCO of the application under Paragraph 172 of the Operational Guidelines and requested that ICOMOS International update their Technical Review of the proposal based on the information submitted as part of the DCO application.

3.11. Historic England will ensure that any further correspondence from UNESCO to the UK State Party regarding the proposed scheme will also be submitted to the Planning Inspectorate to inform the Examination.

#### **4. Relevant Legislation, policies and material documentation**

##### The Planning Act 2008

4.1. The Act establishes the process for dealing with and determining Nationally Significant Infrastructure Projects. Section 104 (2) states that in deciding the application the Secretary of State (SoS) must have regard to a) any national policy statement which has effect in relation to development of the description to which the application relates.....d) any other matters which the SoS thinks are both important and relevant to the SoS's decision. Section 104 deals with the determination where national policy statement has effect and refers to the SoS to have regard to relevant national policy statement amongst others, and the determination must be in accordance with any relevant national policy statement to the extent that one or more of subsections (4) to (8) applies. These subsections include reference to international obligations and require that the World Heritage Convention is considered.

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## Overarching National Policy Statement for Energy EN-1

- 4.2. In national policy terms the primary policy considerations are contained in the NPS EN-1, which largely mirrors the NPPF heritage policies. Central to this NPS is the need to sustain and enhance a heritage asset, including any 'contribution of their settings' (see NPS EN-1 para 5.9.25). In addition, great weight is given to conservation in decision making (see NPS EN-1 para 5.9.27), and this policy goes on to say that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Likewise, any impacts, significant effects or harm need clear and convincing justification (see NPS EN-1 para 5.9.28).

### The 1972 UNESCO Convention

- 4.3. The UK is a State Party to the 1972 UNESCO Convention Concerning the Protection of the World Cultural and National Heritage (the World Heritage Convention). The Convention sets out the duties of States Parties (<https://whc.unesco.org/en/statesparties>) in identifying potential World Heritage Sites and their role in protecting, conserving, presenting and transmitting them to future generations.

### UNESCO's Operational Guidelines for the Implementation of the World Heritage Convention (2024; <https://whc.unesco.org/en/guidelines/>)

- 4.4. These set out the processes and procedures for the State Party to follow in meeting its obligations under the World Heritage Convention. These obligations include the management of change to a World Heritage Site, including within its setting, whilst also preserving its Outstanding Universal Value (OUV).

### UNESCO's Policy Document on Climate Action for World Heritage 2023 (<https://whc.unesco.org/en/climatechange/>)

- 4.5. This provides high-level guidance on enhancing the protection and conservation of OUV through climate action, aligned with the objectives of the United Nations 2030 Sustainable Development Agenda and its 17 Sustainable Development Goals (SDGs). Amongst its guiding principles is the need to anticipate, avoid and minimise harm to protect the heritage of OUV. This can be achieved by undertaking impact assessment to ensure that the OUV of a World Heritage property is not harmed by the effects of projects associated with climate action, such as renewable energy. Impact assessments are an important supporting tool in identifying how climate action can be taken, such as delivering renewable energy, without causing harm to the OUV of a World Heritage property.
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## Blenheim Palace WHS Management Plan

- 4.6. A material consideration of the application is the Blenheim Palace WHS Management Plan (available on the Blenheim Palace website <https://www.blenheimpalace.com/about-us/world-heritage-site/>), which defines seven attributes from the Statement of Outstanding Universal Value which convey and express OUV. These attributes capture the cultural value of the WHS and form the basis against which any impacts should be assessed (5.02-5.09, pp. 48-52 of the Management Plan, see Appendix 2). The range of historic, functional and visual relationships the attributes capture, demonstrates the physical as well as perceptual values that form part of the significance of the Blenheim WHS.
- 4.7. Appendix 3 of the WHS Management Plan Review 2017 comprises a Setting Study which aims to help interpret what is meant by 'the setting' of the WHS and to offer guidance on the ways in which it contributes to the property's OUV.

## **5. Designated Heritage Assets**

- 5.1. In this section we set out the scope of our Written Representations and address in further detail the matters raised in our Section 56 Relevant Representations (February 2025). These two documents should be read together.

***Blenheim Palace World Heritage Site (NHLE 1000091), grade I listed Blenheim Palace (NHLE 1052912) and associated grade I Registered Park and Garden (NHLE 1000434) and***

*(a) Blenheim's Significance, OUV, authenticity and integrity and the attributes that convey it.*

- 5.2. Blenheim Palace was conceived as a public 'memorial' in gratitude to John Churchill, Duke of Marlborough, following his victory over the French army at Blenheim in 1704. Designed by John Vanbrugh in the Oxfordshire countryside, the house is one of the finest examples of English Baroque architecture and is set within a large 18<sup>th</sup> century landscape laid out originally by Henry Wise and Vanbrugh. Mid-18<sup>th</sup> century alterations by Lancelot Brown are acknowledged as one of the best examples of a naturalistic landscape design for which Brown was best known.
- 5.3. The 'property' known as Blenheim Palace was inscribed by UNESCO on the World Heritage List in 1987 at the request of the UK Government, having been found to meet two of the World Heritage Committee's criteria for the assessment of OUV (set out in Paragraph 77 of the *Operational Guidelines*, see Appendix 3), criteria (ii) and (iv).
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(ii) to exhibit an important interchange of human value, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape;

(iv) to be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history.

5.4. The boundary of the WHS almost completely follows the boundary of the Blenheim Palace Grade I Registered Park and Garden with the Grade I listed Blenheim Palace at the centre. Collectively there is a strong inter-relationship between these three designations as the significance of the Palace and RPG are drawn out within the detailed Statement of Universal Value (SOUV).

5.5. The Outstanding Universal Value of Blenheim is summarised in the detailed Statement of Outstanding Universal Value (SOUV), which was adopted by UNESCO in 2013. The SOUV sets out a brief synthesis of the property's OUV, which explains how it met the criteria under which it was inscribed;

- Criterion (ii): By their refusal of the French models of classicism, the Palace and Park illustrate the beginnings of the English Romantic movement, which was characterised by the eclecticism of its inspiration, its return to national sources and its love of nature. The influence of Blenheim on the architecture and organisation of space in the 18th and 19th centuries was greatly felt both in England and abroad.
- Criterion (iv): Built by the nation to honour one of its heroes, Blenheim is, above all, the home of an English aristocrat, the 1st Duke of Marlborough, who was also Prince of the Germanic Holy Roman Empire, as we are reminded in the decoration of the Great Drawing Room [the Saloon] by Louis Laguerre (1719-20). Like the World Heritage properties Residence of Würzburg and the Castles of Augustusburg and Falkenlust in Brühl, Blenheim is typical of 18th century European princely residences.

5.6. The SOUV also discusses the property's integrity and authenticity and describes the requirements for protection and management that were in place at the time of inscription. The adopted SOUV text is discussed in the ES 6.5 Appendix 7.4 Heritage Impact Assessment.

5.7. Understanding the criteria for inscription, how Blenheim meets those criteria, and how its OUV is conveyed by the attributes identified in the SOUV, is fundamental to understanding what needs to be conserved to maintain the World Heritage designation. In turn, this understanding is essential to assessing how the various elements of Blenheim's setting contribute to its attributes of OUV and/or the ability to appreciate them, and support maintenance of that OUV.

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- 5.8. The statement of integrity in the SOUV sets out the ways in which these criteria have remained intact. For example, the perimeter wall ‘defines its [the WHS] extent and maintains physical integrity’; ‘the layout of the principal buildings remains unaltered’; changes wrought by later owners ‘have not detracted from the OUV’; ‘the park contains important veteran trees’; and ‘important visual links do exist between the gates, the parkland buildings, buildings in the surrounding villages and landscape’.
- 5.9. The statement of authenticity in the SOUV stresses that ‘the overall relationship between the Baroque Palace and its Park is still clearly in place’, enabling the OUV to be ‘readily understood despite early 20th century changes to the landscape’, whilst the ‘form and design of the Palace and Park survive well and there is a high degree of survival of fabric, and indeed original fittings and furnishings’.
- 5.10. The statement of protection and management requirements in the SOUV summarises the legislative and planning system under which protection was afforded to the property at the time of inscription.
- 5.11. The WHS Management Plan, a key document under the protection and management system for the property following the property’s inscription, was last updated in 2017.
- 5.12. The attributes which convey and express OUV are defined in and drawn from the SOUV but have been summarised and adopted in the WHS Management Plan (2017), which provides further detail to aid understanding. These seven attributes form the basis against which any impacts on OUV are assessed (see Appendix 2). Of these Attribute 7 specifically mentions the visual relationship with the property’s setting:
- Attribute 7 - ‘...views into and out of the site still provide key visual linkages between Blenheim Palace and the traditional English countryside and villages surrounding it.’.
- 5.13. Meanwhile attributes 1, 4 and 5 convey some associative values that could be drawn from the property’s setting:
- Attribute 1 – ‘*It remains the home of the same aristocratic family.*’ Whilst this is principally embedded in the family being in residence at Blenheim, the way the family has influenced the evolution of the landscape and use the wider estate to support its running of the estate is relevant here.
  - Attribute 4 – ‘*The surviving special relationship between the important architectural elements and their landscape setting are an exceptional piece of design and, together are greater than the sum of their parts.*’ Whilst this
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relationship is focused within the parkland grounds, there are exceptions. There are designed and borrowed aspects from outside the boundary of the park that form an important part of its design. This includes the tower of St Martin's Church in Bladon, which acts as an eye catcher within the park and was used by Vanbrugh as the marker of the long north-south axis on which the park and house were laid out. Furthermore, it is from within the wider countryside landscape that the palace, its designed landscape and the stone wall boundary as a whole entity, can be seen to be the pre-eminent feature of the surrounding area.

- Attribute 5 – *'The UK has by far the greatest concentration of veteran trees in northern Europe and within High Park, which sits in the south-west section of Blenheim Park, is one of the finest areas of ancient oak dominated woodland in the country. It is partially descended from the ancient Wychwood Forest, a 12th century deer park and an Anglo-Saxon chase.'* Whilst this is focussed on land within the WHS boundary, we note that land within the application, prior to enclosure, did form the historic eastern extent of the earlier Wychwood Forest – a landscape of ancient forest, meadows, fields and heaths. Views from the application site's fields to the southwest of the WHS look over this surviving ancient woodland, helping to illustrate the evolution and time depth of the area.

5.14. The Setting Study identifies how various parts of the WHS's setting have the potential to convey different aspects of its attributes and OUV. It undertakes an assessment of the extent of visibility from within and towards the property (in 2017) including longer views from the wider landscape. It also notes where this differs from historic descriptions of the views out of the designed landscape, such as due to the closing or additional filtering of views as planting matured.

5.15. Figure 5 within the Setting Study (Appendix 4) identifies the two main visual links that are of particular significance and need to be protected to conserve Attribute 7 of OUV. These are illustrated as view cones towards the church at Bladon and from the Column of Victory towards Woodstock.

5.16. Paragraph 5.02 (Appendix 4) identifies the elements of the OUV (and the attributes which convey it) that are most directly related to the setting of the WHS as:

- The connection with the River Glyme - the management of this river as it runs through the setting of the WHS directly affects the character, ecological value and water quality of Lancelot Brown's lakes within the WHS;
  - The links with the much larger and ancient Wychwood Forest area;
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- The value of the boundary wall and plantations which mainly hide the park from outside views, but also form important woodland elements in the wider landscape;
- The key visual linkages between Blenheim and its setting - to Bladon church in the south and reciprocal views between Old Woodstock to the Column of Victory in the east;
- The character of the setting as traditional English countryside, dotted with picturesque villages mainly built using a uniform palette of materials.

5.17. Paragraph 5.07 (Appendix 4) of the Setting Study adds that *‘One of the key characteristics of the surroundings of Blenheim Park is that much of the setting lies within the wider extent of the Blenheim estate - which is effectively managed by a single owner... As a traditional landed estate, much of the land is retained in open agricultural and enclosed forestry use - another attribute which contributes to OUV’.*

5.18. This emphasises that the surrounding land is in open agricultural and enclosed forestry use and that this contributes to OUV. The divergence of land uses therefore could inevitably affect the character of the surrounding landscape and thus the setting of the WHS.

*(b) General overview of the contribution made by Blenheim's setting to its attributes of OUV, authenticity and integrity.*

5.19. At Blenheim Palace, the World Heritage Site (WHS) boundary is predominately defined by the location of the park wall (Management Plan Attribute 7). The boundary maintains the property's physical integrity and creates a clear sense of differentiation between the property and its setting.

5.20. The impact of development with potential to affect the contribution made by the property's setting to its OUV is managed under national and local planning policy. The Blenheim Palace WHS does not have a defined buffer zone. Decisions on buffer zones are made on a case by case basis at the time a property is nominated and reviewed subsequently through the World Heritage Site Management Plan review process. Proposals to add buffer zones following inscription are submitted by government (as State Party) for approval by the UNESCO World Heritage Committee who will consider and adopt the proposals as appropriate.

5.21. The designed landscape at Blenheim was not principally laid out with visual links to the countryside and villages outside its walled boundary (i.e. it does not employ the device of borrowed views as part of its design in a way that is characteristic of many other landscape gardens of the period) because of the monumental scale of the park in which the Palace sits.

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5.22. There are two exceptions to this:

- a reciprocal view between the Column of Victory, Woodstock and the countryside beyond the town to the north; and
- a view of St Martin's Church spire in Bladon, which acts as an eye-catcher from within the park and was used by Vanbrugh as the marker of the long north-south axis the park and house was laid out against (Attribute 4). Woodlands and fields behind the church form the backdrop of the view.

5.23. Both these views are identified within the World Heritage Management Plan and associated Setting Study (see 5.15), and form an integral part of Attribute 7, which conveys one aspect of the WHS' OUV.

5.24. The lack of more specific references in the attributes (as defined in the WHS Management Plan) to aspects of the property's setting does not mean that it holds no value, as referenced in Attribute 7. The property's attributes identify visual, physical, and associative relationships that exist across that defined boundary despite the limited visibility from inside the park (due to the wall and boundary plantations) of what lies outside it.

5.25. The attributes identify specific designed views (Attribute 7), the nature and character of the landscape surrounding the WHS (Attribute 7), evidence for the ancient landscape from which it partially descended (Attribute 5) and its (current or historic) use and function (Attribute 1).

5.26. All these express different elements of the relationship between the WHS and its setting. Each element helps define and enhance understanding of the contribution that the property's setting makes to its significance and OUV, to how its attributes are appreciated, and how it supports the maintenance of that OUV.

5.27. The landscape character around the WHS not only adds to the visual appeal one would expect around a stately home, but also contributes to an understanding of how the Blenheim Estate functioned, and thus contributes to its historic value. The Dukes of Marlborough owned much of the surrounding land, which they enclosed and turned to agriculture and plantation woodland for the estate, whilst using the local labour from the nearby villages to work the land.

5.28. The influence of Blenheim, and by association the Duke of Marlborough's family, is therefore strongly felt in the surrounding landscape (Attribute 1). Estate farmland, traditional villages, extensive woodland, plantations, and copses frame the WHS, which continue to reflect the land use and character of the landscape largely as it was shaped in the 18th-century (Attribute 7).

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- 5.29. As set out in the Management Plan, as well as a home for the Duke, Blenheim Palace was built as an expression of national power, an intended monument and statement of military ascendancy and victory that was designed to dominate its landscape, and to be the focus of all important choreographed views and allegorical journeys (page 49: Appendix 2).
- 5.30. Whilst the primary experience of these elements that contribute to attributes of OUV are gained from within the wall, the clearly defined wall boundary and tree shelterbelt, are the outward expression of this prominence from the wider landscape, which also helps reinforce its integrity.
- 5.31. From any direction of travel around Blenheim the park's shelterbelt signals a marked change in the landscape character, as the traditional rolling farmed and wooded countryside interspersed with clustered villages gives way to the large dense shelterbelt with specimen and visually distinctive ornamental parkland trees appreciable on the skyline, indicating the designed and formal landscape that lays within (Attribute 4).

*(c) The Development site's contribution to the setting of the WHS*

- 5.32. Blenheim Palace sits within a rural landscape surrounded by rolling farmland, traditional villages and woodland pockets, which has been influenced and shaped by successive Dukes of Marlborough. The fields south of Bladon offer some of the best locations to appreciate Blenheim's influence over the wider landscape and how this rural farming/woodland/village character gives an aesthetically pleasing and traditional character to the setting of Blenheim. Several Public Rights of Way (PROW) cross these fields to the south of the WHS, connecting to the villages and Oxfordshire countryside to the south. These PROW converge on the village of Bladon, from within which the walled parkland of Blenheim is a prominent feature terminating views.
- 5.33. Views towards Blenheim from the central site of the DCO application are generally restricted by a thick tree shelterbelt. However, glimpsed seasonal views into the park can be gained from some fields on the PROW north of Bladon Heath, but these are fleeting and even to the northeast of Withy Clump the southern boundary shelterbelt restricts views into the park.
- 5.34. The exception to this is the upper part of the unreferenced field partially included in the Order Limits between field parcels 2.25 and 2.8 (as referenced in Figure 2b within ES Appendix 7.1: Historic Environment Desk-based Assessment (EN010147/APP/6.5)).
- 5.35. Historic parks can be read in the landscape of the English countryside, and Blenheim is one of the greatest examples of naturalistic landscape design. Despite the lack of views in, it is still possible to appreciate that one is looking at a designed landscape in views from this
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part of the central site. The transition from traditional rolling farmed and wooded countryside interspersed with clustered villages to an ensemble of dense tree shelterbelt, with distinctive specimen and ornamental parkland tree canopies can be clearly appreciated from the fields around Bladon - i.e. from within the application site. Therefore this 'traditional English countryside', in the setting of the WHS and RPG, contributes to OUV, as an element of Attribute 7, and its wider significance.

- 5.36. Views from these fields offer an opportunity to experience how the ensemble of the Palace, with its designed landscape and stone wall boundary, are inextricably linked, and as a whole entity form the pre-eminent feature within this wider landscape. This has an associative connection to elements of Attribute 4. The combination of the fields, woodlands, and Bladon village in the shadow of Blenheim provide a snapshot of the wider historic landscape character that surrounds and was part of Blenheim's landed estate (Attribute 1) and supports the maintenance of Blenheim's OUV by preserving its rural surroundings.
- 5.37. Due to the more undulating topography to the southwest of Bladon, there are views that stretch beyond the WHS's shelterbelt and stone boundary wall into the interior of the parkland. These views look across Blenheim's High Park, which contains a large number of veteran and ancient trees that provide a direct physical link back to when the royal deer park was established at Woodstock, which is an element of Attribute 5.
- 5.38. As one moves further south (i.e., further away from the WHS) that experience and intervisibility with the WHS dissipates as the topography and ancient/plantation woodland screens views towards Blenheim, reducing that connection of the land to Blenheim to the point where it is indiscernible from the Oxfordshire countryside more generally.

*(d) Impact of the proposals on significance and OUV*

- 5.39. The HIA (EN010147/APP/6.5 ES Appendix 7.4) concludes 'no element of the Project would be visible from any location within the WHS, regardless of the season or the time of day' (1.4.40). Based on the information available, we do not consider sufficient information has been submitted to enable us to agree with that assessment currently. The ZTV provided suggests there would be some specific points within the WHS that the development could be appreciated from, and further evidence is required to support the applicant's conclusions.
- 5.40. Based on the information provided, Historic England considers that the northern and southern sections of the development would not affect the attributes of OUV of the Blenheim Palace WHS and significance of Blenheim Palace and its RPG, but the central section would affect – and harm some attributes of OUV and, therefore, harm OUV itself. Here some field parcels, due to their proximity and intervisibility with Blenheim's boundary, make a strong contribution to the experience of the estate set within its rural countryside and the development would compromise this contribution.
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- 5.41. In relation to views towards Blenheim Palace, the applicant has acknowledged that there are views from the fields to the south of Bladon that allow elements of the WHS to be appreciated, and the project would change the character of this land those views are experienced in (1.4.44-45). The HIA, however, does not assess how this could impact the relationship between parts of the property's setting and its OUV. In our view the assessment and explanation of relationships here and assessment of the potential impact could be drawn out in more specific detail, which would help to inform how that impact can be minimised.
- 5.42. We consider that the appearance of large-scale solar arrays in field parcels marked 2.1, 2.2, 2.5, and 2.20-2.26 (Figure 2b within ES Appendix 7.1: Historic Environment Desk-based Assessment) would change the character of the landscape within which the WHS OUV, and the ensemble of the RPG and Palace, would be experienced. In this case, the transition from traditional rolling countryside to shelterbelt, and the way that views from surrounding fields help provide an understanding of the park's context (which contributes to Attribute 7), would be eroded.
- 5.43. To a lesser degree this visibility would also affect the historic and functional relationship, which relates to Attribute 1. Whilst the change of use would signal a change in how the land supports Blenheim, the change of use of the land while under PV panels would still support maintenance of OUV (Attribute 1), and so that functional relationship would be maintained.
- 5.44. It is unclear at this stage if Attribute 4 would be impacted by the scheme and further detail should be provided by the applicant so a more informed view can be made. Sheet 6 of the Works Plan (EN010147/APP/2.3) shows works within the unreferenced field between field parcels 2.25 and 2.8 (as referenced in Figure 2b within ES Appendix 7.1: Historic Environment Desk-based Assessment (EN010147/APP/6.5).
- 5.45. However, the upper part of this field has some intervisibility with the WHS and forms the backdrop of the view to Bladon Church, which relates to Attributes 4 of Blenheim's OUV. Table 1.1 of the HIA currently states that the construction, operation and maintenance, and decommissioning of the Project would not result in any impact on attribute 4 nor 'the key visual linkages between Blenheim and its setting - to Bladon church in the south'. While this conclusion is a reasonable assumption, it needs to be supported by a more detailed analysis of the impacts in this sensitive part of the landscape.
- 5.46. The Illustrative Masterplan (6.4 ES – Figures 2.2B) indicates that within this field parcel (referenced above) only cabling is proposed (no fences or lighting is shown). We would agree this is unlikely to impact the OUV and significance of Blenheim, however it is not clear if some impacts may arise through the construction and decommissioning phase (for example through artificial temporary lighting or visible construction elements). The applicant
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should provide further supporting evidence so that we can advise the ExA of our views and enable an informed decision to be made on any impacts to this attribute.

5.47. Whilst further supporting evidence is required to come to a fully formed view of the impacts of the proposals, we consider that the solar panels in the fields marked 2.1, 2.2, 2.5, and 2.20-2.26 in Figure 2b within ES Appendix 7.1: Historic Environment Desk-based Assessment (EN010147/APP/6.5) would detract from the traditional character of the countryside and its relationship with the historic park as conveyed in Attribute 7, and to a lesser extent Attribute 1. In the language of the NPS (EN-1) the harm to the significance of Blenheim Palace and RPG and the OUV of the WHS would be modest level of less than substantial harm.

*(e) Position*

5.48. The applicant has concluded within the Heritage Impact Assessment (Appendix 7.4) that the development would have a minor negative impact on a single attribute of Blenheim's OUV. This is Attribute 7. Based on the information available, we agree this is the attribute most closely associate to the setting of the WHS and the attribute most impacted by the proposals.

5.49. However, we do not believe this attribute is impacted in isolation and the contribution of attributes 1, 4 and 5 should be given further consideration due to their association to Blenheim's setting.

5.50. In particular, further assessment is required to understand if Attribute 4 would be impacted by the proposals, and whether this would be during construction, operation or decommissioning phases.

5.51. It would be helpful for the HIA to be clearer about which land parcels of the development contribute to and would harm Attribute 7.

5.52. As set out in our assessment, we consider the field parcels marked 2.1, 2.2, 2.5, and 2.20-2.26 in Figure 2b within ES Appendix 7.1: Historic Environment Desk-based Assessment (EN010147/APP/6.5) form part of the setting, which contributes to the significance and OUV of Blenheim. The proposed introduction of a semi-industrial character would harm Blenheim's OUV and the significance of the ensemble of the grade I listed building and RPG. Our position reflects similar concerns raised by ICOMOS in its 2024 Technical Reviews regarding the Botley West proposal and Urban Expansion in the setting of the property.

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- 5.53. We note that the applicant asserts that the harm is ‘temporary’ and ‘reversible’ as it would be decommissioned and removed, and the Order limits would be re-landscaped after an operational period of around 42 years. In practice, however, the proposed development would be in place for nearly two generations and would establish the principle of built form of a semi-industrial character on land near the southern boundary of the WHS, thereby creating a precedent for potential extended operation or intensification.
- 5.54. While the harm would not be substantial in NPS terms, as heritage assets of international and exceptional national significance, Blenheim Palace and its park should attract particularly great weight in the planning balance and every effort should be taken to avoid, and if this is not possible, minimise, harm in accordance with NPS EN-1 (5.9.24).
- 5.55. We equally recognise that the proposals may contribute to a cumulative change in the setting of the property, as a result of other developments coming forward in the vicinity of the World Heritage Site, but having carefully reviewed this, this does not alter the level of less than substantial harm we have identified.
- 5.56. As set out in our relevant representations, further refinements could avoid much of the harm to the WHS, Blenheim Palace listed building and RPG, by removing solar panel development from the fields marked 2.1, 2.2, 2.5, and 2.20-2.26. By keeping these fields clear of solar development, the scheme would avoid a semi-industrial landscape being created in a part of the traditional rural setting of Blenheim and on fields which make a particularly strong contribution to the appreciation of Blenheim’s OUV. Users of the PROWs would continue to be able to experience that setting and its connection to Blenheim unimpeded by modern infrastructure alien to the traditional landscape character.
- 5.57. Whilst this would reduce solar output, we consider the scheme would still contribute very positively to the objective of delivering large scale renewable energy, as well as meet the requirements of both UNESCO’s updated Policy document on Climate Action for World Heritage and the EN-1 Policy Statement.
- 5.58. We would strongly encourage the applicant to remove the solar panels from these fields. Should these changes not be forthcoming the Secretary of State (SoS) will need to have regard to policies in NPS EN-1, in particular paragraphs 5.9.24, 25, 27 and 28, in coming to a decision. Given the policy considerations, the ExA would therefore need to be content that the benefits outweigh the harm to a heritage asset of the greatest possible importance.

### ***Roman Villa Scheduled Monument***

#### ***(a) Significance***

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- 5.59. Although scheduled as a Roman villa, the Roman site at Sansom's Platt is now accepted to be the site of a small Roman town associated with the Roman road called Akeman Street, although the exact relationship with Akeman Street is not clear.
- 5.60. The small town may have had a temple, but, as Helen Winton notes, 'The presence of a possible temple may not be seen as particularly significant' ('A Possible Roman Small Town at Sansom's Platt, Tackley, Oxon' *Britannia*, 2001, v32, 308; Appendix 5).
- 5.61. The town would have had a significant function in the collection and redistribution of agricultural produce from the surrounding countryside, either as subsistence for the population itself or as surplus marketed and distributed along the local road system. As Burnham and Wachter note, 'there is little doubt that most small towns were closely connected with agricultural production' (*The 'Small Towns' of Roman Britain*, 1990, 5; Appendix 6).
- 5.62. Professor Peter Salway says, 'The small town, therefore, is essentially dependent on the countryside, either because it houses people who work the land, or it serves the daily needs of the estates and peasant farmers of the district, probably both.' (*A History of Roman Britain* (1993), 429; Appendix 7).
- 5.63. 'Most Roman-period settlement types are intimately associated with the rural landscape. While it is stating the obvious to say that farmsteads and (most) villas will have been integrated into the rural landscape, it is similarly true that towns could also be centres for farming.' (*Roman Settlements; Introduction to Heritage Assets* (Historic England, 2018); Appendix 8).
- 5.64. Paul Booth notes that even settlements at the upper end of the regional hierarchy would have close connections with the surrounding countryside (Henig and Booth, *Roman Oxfordshire* (2000), 61, referring to Dorchester-on-Thames; Appendix 9)
- 5.65. It follows that part of the significance of a small Roman town like the one at Sansom's Platt must lie in that association with the surrounding rural landscape, and it also follows that that part of the surrounding landscape with which it is most intimately associated is that part lying immediately adjacent. While that landscape has undoubtedly changed since Roman times, it remains predominantly rural and allows an understanding of the intimate relationship of this small town with its rural hinterland.

(c) *Impact*

- 5.66. The photomontages from viewpoint 9 make clear that the development will be highly visible from the scheduled monument (EN10147/APP/6.4; Figure 8.265). Although the
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panels and fencing in this view will be screened by year 15, for a significant part of the life of the development they will remain visible.

5.67. As a modern intrusion, the panels would harm the significance of the monument through the impact upon the appreciation of the rural surroundings of this Roman settlement. In the Settings Assessment (EN010147/APP/6.5), with respect to the impact on the scheduled monument (1.9.4), the impact is assessed as negligible adverse, which according to table 7.9 in volume 1, chapter 7, Historic Environment (EN010147/APP/6.3) would apply where the asset is 'barely affected'. In our view, given that the impact would be for the duration of the site's operation, the impact must be greater than this and we suggest it might be considered low adverse by the criteria offered in table 7.9 (i.e. 'slightly harmed').

*(d) Position*

5.68. Although the magnitude of impact on the scheduled monument through the effect upon its setting would be minor or moderate (in terms of the criteria in table 7.10), the Secretary of State will need to have regard to policies in NPS EN-1, in particular paragraphs 5.9.25, 27 and 28, in coming to a decision. Given the policy considerations, the ExA would therefore need to be content that the benefits outweigh the harm and that the impact can be justified in terms of those and the wider policy tests of the policy statement.

5.69. We note that geophysical survey shows that the settlement may extend beyond the scheduled area in all directions (Settings Assessment, 1.9.6). We understand that trial trenching has been carried out around the scheduled monument, but without the results of that trenching it is not possible to be sure of the true extent. It may be that the area of archaeological remains beyond that already scheduled is found to be of national importance.

5.70. In that case, it would be both the impact upon the setting of the scheduled area and the nationally important remains that would require assessment, as nationally important remains 'demonstrably of equivalent significance' should be considered subject to the same policies as scheduled monuments (NPS EN-1 para 5.9.6). It might then be necessary to amend the 'buffer' around the scheduled monument as currently proposed. For this reason, we would welcome sight of the results of the trenching around the monument as soon as possible.

***Church of St Peter and St Paul, Church Hanborough***

*(a) Significance*

5.71. St Peter and St Paul is a grade I listed early 12<sup>th</sup> century church (NHLE 1052991), remodelled in the 13<sup>th</sup> century. The church's stands in a churchyard, which contains numerous grade II listed tombstones.

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5.72. The church is a prominent landmark in Church Hanborough and the surrounding area. Its elevated position and very fine tall spire give the church its landmark qualities: it can be seen on the skyline throughout the traditional agricultural landscape around Church Hanborough, which includes the application site. The views of the church within the open countryside contributes to the appreciation and understanding of the origins of the church as a rural parish church and its close connection with the landscape (including the application site).

*(b) Impact*

5.73. The proposed development would occupy open agricultural fields to the east and south of Church Hanborough. Whilst there would be no physical impacts on the church, there would be clear intervisibility between the development and the church, in particularly sustained views from the development areas looking north towards the church. This would not disrupt views of the church spire, or impact its landmark qualities, but it would erode the character of the church within its traditional open agricultural setting.

5.74. The applicant has identified that the development's impact upon the church would be negligible adverse and would not be a significant effect. The applicant suggests that the harm is 'temporary' and 'reversible' as it would be decommissioned and removed, and the Order limits would be re-landscaped after an operational period of around 42 years. In practice, however, the proposed development would be in place for nearly two generations and would establish the principle of built form of an industrial character in land from which the church is experienced and thereby creating a precedent for potential extended operation or intensification.

5.75. In our view the impact would be greater than negligible, which is defined as the setting of a heritage asset being 'barely affected' (table 7.9). As the proposals would transform parts of the countryside that makes up the church's rural setting, we consider this would equate to a slightly higher magnitude of impact than stated; low adverse by the criteria offered in table 7.9 (i.e 'slightly harmed'). In NPS terms this would amount to modest harm to the significance of the heritage asset from development within its setting.

*(c) Position*

5.76. We acknowledge the applicant has proposed mitigation in the form of landscape screening. This represents appropriate mitigation, and we accept that due to the landscape's undulating topography, the harm can only be slightly reduced rather than removed entirely.

5.77. The Secretary of State will need to have regard to policies in NPS EN-1, in particular paragraphs 5.9.25, 27, 28 and 31, in coming to a decision. Given the policy considerations, the ExA would therefore need to be content that the benefits outweigh the harm and that the impact can be justified in terms of those and the wider policy tests of the policy statement.

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## **Church of St Peter, Cassington**

### *(a) Significance*

- 5.78. The Church of St Peter's, Cassington (grade I: NHLE 1367949) is an early 12<sup>th</sup> century church, restored in the 14<sup>th</sup> century, when the spire was added, and again in the 19<sup>th</sup> century. The church stands in a churchyard, which contains numerous grade II listed tombstones.
- 5.79. Cassington sits on relatively flat lowland, however the undulating landscape surrounding the village offers vantage points in which views overlooking the village, and St Peter's broach spire, can be appreciated. Due to the landscape depression the church sits within, the church spire is not seen against clear sky, but instead against a backdrop of agricultural fields. This strong visual relationship between the landscape and the church contributes to the appreciation and understanding of the origins of this rural parish church and its close connection with the landscape.

### *(b) Impact*

- 5.80. The proposed development would change the character of those fields behind the church spire from agricultural to semi-industrial. In these views, whilst the church spire would remain visible, the development would erode the church's traditional agricultural context. The ordered rows of solar panels would also make it slightly more difficult to appreciate the silhouette of the spire, when compared to the existing backdrop of patchwork fields, disrupting its landmark qualities.
- 5.81. The applicant has identified that the development's impact upon the church would be negligible adverse and would not be a significant effect. The applicant suggests that the harm is 'temporary' and 'reversible' as it would be decommissioned and removed, and the Order limits would be re-landscaped after an operational period of around 42 years. In practice, however, the proposed development would be in place for nearly two generations and would establish the principle of built form of an industrial character in land from which the church is experienced and thereby creating a precedent for potential extended operation or intensification.
- 5.82. In our view the impact would be greater than negligible, which is defined as the setting of a heritage asset being 'barely affected' (table 7.9). As the proposals would transform parts of the countryside that makes up this church's rural setting, this would equate to a slightly higher magnitude of impact than stated, at low adverse by the criteria offered in table 7.9 (i.e. 'slightly harmed'). In NPS terms this would amount to modest harm to the significance of the heritage asset from development within its setting.

### *(c) Position*

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- 5.83. We acknowledge the applicant has proposed mitigation in the form of landscape screening. This represents appropriate mitigation, but due to the landscape's undulating topography can only reduce rather than remove the harm entirely.
- 5.84. The Secretary of State would therefore need to have regard to policies in NPS EN-1, in particular paragraphs 5.9.25, 27, 28 and 31, in coming to a decision. Given the policy considerations, the ExA would therefore need to be content that the benefits outweigh the harm and that the impact can be justified in terms of those and the wider policy tests of the policy statement.

### ***Church of St Michael, Begbroke***

#### ***(a) Significance***

- 5.85. St Michael, Begbroke (grade II\*: NHLE 1291232), is a small late 12<sup>th</sup> century parish church, constructed on a traditional plan of a chancel, nave and west tower. The upper part of the tower and its saddleback roof was added in the 14<sup>th</sup> century.
- 5.86. The church is situated to the northern edge of the village and is best appreciated in the view looking north along St Michaels Lane. The church is also appreciable along the Public Rights of Way in the agricultural fields to the north (covered by the application site). From that location, the church tower is visible but is, in part, screened by trees. From these fields the church can be seen within its countryside setting, which contributes to its significance as a rural place of worship.
- 5.87. As you get closer to the church along the PROW, the church disappears from view behind an existing hedgerow. Within the fields the church can be seen alongside the former St Philip's Priory and Church (both grade II listed), and together these have group value in being a focal point in the landscape and gives the viewer the sense that they are approaching an important ecclesiastical complex.

#### ***(b) Impact***

- 5.88. The proposed development would signal a hardening of the setting of the church, replacing rural open fields with regimented rows of solar panels bound within fences. The experience would change from a rural character to one that is semi-industrial. While views of the church tower would not be physically impacted by the development, the ability to experience the church within its traditional agricultural context on this approach would be eroded.
- 5.89. The applicant has identified that the development's impact upon the church would be negligible adverse and would not be a significant effect. The applicant suggests that the harm
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is ‘temporary’ and ‘reversible’ as it would be decommissioned and removed, and the Order limits would be re-landscaped after an operational period of around 42 years. In practice, however, the proposed development would be in place for nearly two generations and would establish the principle of built form of an industrial character in land from which the church is experienced and thereby creating a precedent for potential extended operation or intensification.

5.90. In our view impact would be greater than negligible, which is defined as the setting of a heritage asset being ‘barely affected’ (table 7.9). As the proposals would transform parts of the countryside that makes up this church’s rural setting, this would equate to a slightly higher magnitude of impact than stated, at low adverse by the criteria offered in table 7.9 (‘slightly harmed’). In NPS terms this would amount to modest harm to the significance of the heritage asset from development within its setting.

*(c) Position*

5.91. In our view, expanding the width of the PROWs through those fields, would help retain a greater sense of the open countryside setting of the church, reducing the harm caused. We therefore recommend the ExA should seek advice from the applicant to see if any further such mitigation would be possible, in order to further reduce the harm to the designated heritage asset.

5.92. It will be for the Secretary of State to have regard to policies in NPS EN-1, in particular paragraphs 5.9.25, 27, 28 and 31, in coming to a decision. Given the policy considerations, the ExA would therefore need to be content that the benefits outweigh the harm and that the impact can be justified in terms of those and the wider policy tests of the policy statement.

## **6. Additional Information**

6.1. Historic England has had continued and constructive engagement with the applicants with the intention of ensuring the historic environment has been adequately assessed and considered in the development of this DCO application. The advice above sets out our assessment of the proposals’ impact on highly graded designated heritage assets on the basis of the information provided to date, but is, in some parts, qualified due to gaps in that information. At this stage there remains additional information we consider the ExA should request from the applicant.

*Heritage Impact Assessment (HIA)*

6.2. The HIA is set out in Appendix 7.4 (EN010147/APP/6.5). As described by UNESCO in its Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022), HIA is an

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iterative not a linear process. We therefore expect this document to evolve through discussion during the Examination of the DCO. The HIA has adopted this approach to date and Historic England has commented on previous drafts of this document. This remains a work in progress, and we think further work is needed to successfully demonstrate the impacts of the Project have been captured and assessed.

- 6.3. Specifically, the HIA currently does not refer to or address the ICOMOS Technical Reviews. In its Technical Reviews (see 3.7-3.9), ICOMOS expressed its concern, based on the information that was available at the time, about the proposal's potential impact on the property's OUV due to the change within its setting including the cumulative impact in relation to applications for housing within Blenheim's setting. It is important for the HIA to engage with the Reviews as this provides an opportunity for the applicant to set out how they have addressed the points raised and how these are reflected in the current proposal.
  - 6.4. The HIA identifies that the development would negatively impact an attribute of OUV (see Appendix 7.4 HIA 1.6.3). However, because it has not fully undertaken its own assessment of the relationships between parts of the property's setting and its OUV, the conclusions are not specific about which parts of the development site would cause harm to OUV. Because the HIA conclusions are not clear on where harm is caused, it is not clear how the impacts to an attribute to OUV have been avoided or minimised.
  - 6.5. The sensitivity map produced by the applicant could be a helpful tool to address this gap in the assessment. However, this requires further strengthening to explain the methodology used to assess the sensitivity level of individual land parcels, and how decisions were made about which land parcels to include within the Scheme on this basis (Figure 1.3 EN010147/APP/6.5).
  - 6.6. The HIA does not justify its conclusion that impacts would principally arise from visual changes. There is need for a more structured assessment of the types of potential impact and for all the elements of the proposed scheme to be considered, e.g. from excavation of archaeological remains to installation of security fencing, the noise of construction traffic and the impact of security or other lighting (as partially summarised at 1.4.79 of the HIA).
  - 6.7. Based on our assessment, there remains the potential for aspects of the scheme to be appreciable/visible from within the boundary of the WHS, such as along the cabling route between field parcels 2.25 and 2.8. Whilst any impact would be most likely relate to the construction and decommissioning phase of the Project, it is important the assessment has considered this impact and how, if necessary, it would be mitigated and managed throughout the lifetime of the project.
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## *ES – Historic Environment*

- 6.8. As alluded to throughout our advice above we consider the conclusions drawn around the magnitude of impact (Settings Assessment (EN010147/APP/6.5) in relation to the highly designated heritage assets covered within our advice are understated.
- 6.9. The magnitude of impact to the setting of the Roman Villa Scheduled Monument, Blenheim RPG, Church of St Peter in Cassington, Church of St Peter and Paul in Church Hanborough and the Church of St Michael in Begbroke are presented as negligible adverse. As defined in Table 7.9 (in volume 1, chapter 7, Historic Environment EN010147/APP/6.3) this applies where the asset is 'barely affected'.
- 6.10. In our view, given that in each of these cases the development would be clearly appreciable from these assets or within the setting in which these assets are experienced for the duration of the site's operation, the impact must be greater than this. We would recommend the applicant revisits these conclusions to ensure the impacts are identified at the appropriate level.
- 6.11. There is no lighting strategy within the ES nor assessment of the nighttime effects the development may have on the historic environment. We understand as set out in Chapter 6: Project Description of this ES [EN010147/APP/6.3] this is due to there being no permanent lighting proposed, with all the lighting being operated manually/motion activated or emergency lighting.
- 6.12. However, it is not clear how much lighting is proposed and what the nature of its use will be through the life of the project (construction, operation and decommissioning). We therefore are unable to come to conclusions on what, if any, impact this aspect of the scheme may have. As set out in our GPA3 guidance (page 2), while the extent and importance of setting is often expressed by visual considerations, the way we experience an asset in its setting is also influenced by other environmental factors. This includes artificial lighting.
- 6.13. We would particularly like to understand the lighting strategy within the fields to the south of Bladon and what extent the lighting when in use may be appreciable within the WHS and during the development's construction and operation phases.

## *Visualisations*

- 6.14. The scheme visualisations are included at ES 6.4 Figures 8.248 to 8.371. It is essential that the complement of visualisations submitted demonstrates to the Examining Authority the full range of visual impacts on the OUV and experience of the Blenheim WHS and the designated and non-designated heritage assets in that same landscape.
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- 6.15. In general, we are concerned by the limited number of visualisations in comparison with representative views. This may reflect the outline nature of the scheme. The submitted generalised Representative Viewpoints complement, but cannot be substitutes for, views to, from or including individual, sensitive, heritage receptors or groups of assets where such views are needed to illustrate the effect and visual impact of the scheme.
- 6.16. The application states that there would be no intervisibility of the development from within the WHS (Para 1.4.40). Whilst Blenheim does benefit from a mature shelterbelt tree boundary, the results of the Zone of Theoretical Visibility (ZTV) assessment (Figure 8.10 EN010147/APP/6.4), do not corroborate this conclusion. The ZTV indicates there would be some visibility of the panels and built elements of the Project from land within the Blenheim Palace WHS.
- 6.17. It is therefore surprising that the application is not supported by a comprehensive set of high-quality visualisations from those locations within the WHS to verify this statement.
- 6.18. Furthermore, as identified within our impact section of this report (see 5.38-5.46), we question the validity of that statement. There remains ambiguity over the potential for the proposal to appear in views looking out from the WHS. This has not been fully accounted for in the HIA nor shown within the visualisations provided to date. It is also unclear if this impact would be temporary for the construction and decommissioning phases of the development, and further details are required to understand what this impact may be and how this can be mitigated.
- 6.19. Equally, despite the HIA identifying a change in character to the setting of the WHS to the south of Bladon and acknowledging this would impact an attribute of OUV, there are no visualisations from these fields to illustrate the impact identified.
- 6.20. In our discussion with the applicant, we have agreed additional viewpoints to address this gap in the assessment, and we understand these will be provided during the Examination. We will review this information when submitted and comment as appropriate. We expect these visualisations to show all components of the Proposed Development, including associated infrastructure (such as security fencing, CCTV poles, lighting, substations etc.), and demonstrate the Proposed Development before and after mitigation, including winter views, in order to enable a worst-case scenario and the effectiveness of mitigation to be fully understood.

### *Detailed Design*

- 6.21. Further information should be requested from the applicant to provide a clearer understanding of design detail and associated infrastructure proposed within the
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unreferenced field between field parcels 2.25 and 2.8. This is necessary to ensure any negative effects can be properly assessed during the Examination and any negative effects are successfully avoided or minimised.

- 6.22. We would also welcome the results of the trial trenching around the scheduled monument at Sansom's Platt being shared with us.

## **7. Other Matters**

### *Unaccompanied Site Visits*

- 7.1. We note the Planning Inspectorate Unaccompanied Site Inspection Notes (25-27<sup>th</sup> February 2025) and are pleased to see views from within the WHS and the boundary of the WHS to the west of Bladon were observed. In future visits we would recommend the ExA walk the Public Rights of Ways through the agricultural fields (part of the application site) to the south and southwest of Bladon and observe the visual connection and contribution these fields make as part of the setting of the WHS, Blenheim Palace, Blenheim RPG and the churches of St Peter and St Paul, Church Hanborough, St Peter's, Cassington and St Michael's in Begbroke.
- 7.2. We also would recommend that the scheduled monument of Sansom's Platt should be visited to assess the impact upon it through the proposed change of setting.

### *Schedule 16 (3) Further information and consultation*

- 7.3. We note that there is currently no provision within this schedule for the Local Planning Authority to consult with third parties. It may be helpful if there was scope for consultation with Historic England on certain matters (detailed design for the lighting, fencing and landscape in the setting to highly designated heritage assets) should the LPA seek it. Such a provision would give the opportunity to work positively to deal with those changes being proposed.

### *Schedule 2 – Requirements*

- 7.4. Archaeology (10) states that no development can take place in that part where 'intrusive archaeological surveys' need to take place first, but we have been unable to identify in the application where the locations of those intrusive archaeological surveys are defined. We would therefore be grateful if this could be clarified.
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## 8. Conclusion

- 8.1. Historic England recognises the importance of expanding the provision of renewable energy. Our advice is given to ensure that the historic environment and in particular the World Heritage Site is properly taken into account in the determination of this DCO. Whilst the adverse impact of the proposed development would seem limited, we have concerns that the proposals would cause harm to a number of highly designated heritage assets, from the construction, operation and maintenance of the solar farm, while also recognising that these proposals would contribute to the sustainability of the World Heritage Site.
- 8.2. Whilst we welcome the positive pre-application discussions we have had with the applicant so far, the application requires further evidence to support some of the impacts and conclusions that have been drawn (see Section 6 above). We consider, in relation to the Blenheim Palace World Heritage Site, Blenheim Palace and RPG, that the development would result in some harm to its OUV and significance. This would be a significant effect and in policy terms would mean harm to a designated heritage asset of the highest importance. In NPS terms the harm would be less than substantial in nature. We nonetheless consider the harm could be avoided through targeted changes to the scheme, by removing the solar panels from the fields immediately to the south of Bladon.
- 8.3. In relation to the Roman Villa Scheduled Monument, we conclude that the harm from the impact on its significance through the impact on its setting would be greater than negligible. We also conclude that the layout of panels in the vicinity of the monument may need to be amended if trial trenching shows the area of nationally important archaeology to be greater than the area currently scheduled.
- 8.4. With regards to the churches of St Peter and Paul in Church Hanborough, St Peter's in Cassington and St Michael's in Begbroke we conclude the loss to their rural setting would amount to modest harm. This would be through the replacement of agricultural fields in which the churches can be appreciated being replaced with solar development. This would result in some harm to the significance of these churches, but it would be at the lower end of less than substantial harm.
- 8.5. The Secretary of State would therefore need to have regard to policies in NPS EN-1 in particular paragraphs 5.9.25, 27 and 28 in coming to a decision. Given the policy considerations the ExA would therefore need to be content that the benefits outweigh the harm and that the impact can be justified in terms of those and the wider policy tests of the policy statement.
- 8.6. Historic England will continue our dialogue regarding these matters with the applicant, through our role as a statutory consultee. We hope that through our continued and constructive engagement, we will be able to resolve the outstanding matters, as covered in our Written Representation, during the course of the Examination.
-

8.7. Historic England will also provide updates on its position as the Examination Period proceeds and in light of any further information that it may receive from the applicant during the Examination Period.

## **9. Appendices**

### **Appendix 1 – National Heritage List for England List Entries (see next page).**

# Blenheim Palace

Listed on the National Heritage List for England. Search over 400,000 listed places

(<https://historicengland.org.uk/listing/the-list/>)

## Official list entry

Heritage Category: **World Heritage Site**

List Entry Number: **1000091**

Date first listed: **1987**

Date of most recent amendment: **2008**

## Summary

Blenheim Palace, near Oxford, stands in a romantic park created by the famous landscape gardener 'Capability' Brown. It was presented by the English nation to John Churchill, first Duke of Marlborough, in recognition of his victory in 1704 over French and Bavarian troops. Built between 1705 and 1722 and characterized by an eclectic style and a return to national roots, it is a perfect example of an 18th-century princely dwelling.

This site is a cultural site in England. It is located at N51 50 31 W1 21 41.

There is a World Heritage Site Management Plan (2006) for the site and a lead officer at Blenheim Palace is charged with implementing the objectives and action plan. A Steering Group made up of key stakeholders provides a strategic forum and oversees World Heritage activities.

## Statement of Significance

Blenheim Palace near Oxford was inscribed as a World Heritage Site in 1987 for its architectural importance, as the design and building of the Palace between 1705 and 1722 represented the beginning of a new style of architecture and for its landscaped Park designed by Lancelot 'Capability' Brown which is considered as "a naturalistic Versailles".

In tangible form Blenheim is an outstanding example of the work of John Vanburgh and Nicholas Hawksmoor, two of England's most notable architects. Blenheim represents a unique architectural achievement celebrating the triumph of the English armies over the French. Blenheim and its associated Park has exerted great influence on the English Romantic movement which was characterised by the eclecticism of its inspiration, its return to national sources and its love of nature. The original landscape set out by John Vanburgh who regulated the course of the River Glyme was later modified by Lancelot 'Capability' Brown who created two lakes seen as one of the greatest examples of naturalistic landscape design. Blenheim Palace was built by the nation to honour one of its heroes the first Duke of Marlborough and is also closely associated with Sir Winston Churchill.

Criterion (ii): By their refusal of the French models of classicism, the Palace and Park illustrate the beginnings of the English Romantic movement which was characterised by the eclecticism of its inspiration, its return to national sources and its love of nature. The influence of Blenheim on the architecture and organisation of space in the 18th and 19th centuries was greatly felt in both England and abroad.

Criterion (iv): Built by the nation to honour one of its heroes, Blenheim is, above all, the home of an English aristocrat, the 1st Duke of Marlborough, who was also Prince of the Germanic Holy Roman Empire, as we are reminded in the decoration of the Great Drawing Room by Louis Laguerre (1719-20).

In virtue of this criterion, just like the Residence of Wurzburg (included in 1981) and the Castles of Augustusburg and Falkenlust in Bruhl (included in 1984), Blenheim is typical of 18th century European princely residences, a category which is still under-represented on the World Heritage List.

## Criteria

This entry is compiled from information provided by UNESCO who hold the official record for all World Heritage Sites at their Paris Head Quarters. This entry is provided for information only and those requiring further assistance should contact the World Heritage Centre at UNESCO.

Criterion (ii): By their refusal of the French models of classicism, the Palace and Park illustrate the beginnings of the English Romantic movement which was characterised by the eclecticism of its inspiration, its return to national sources and its love of nature. The influence of Blenheim on the architecture and organisation of space in the 18th and 19th centuries was greatly felt in both England and abroad.

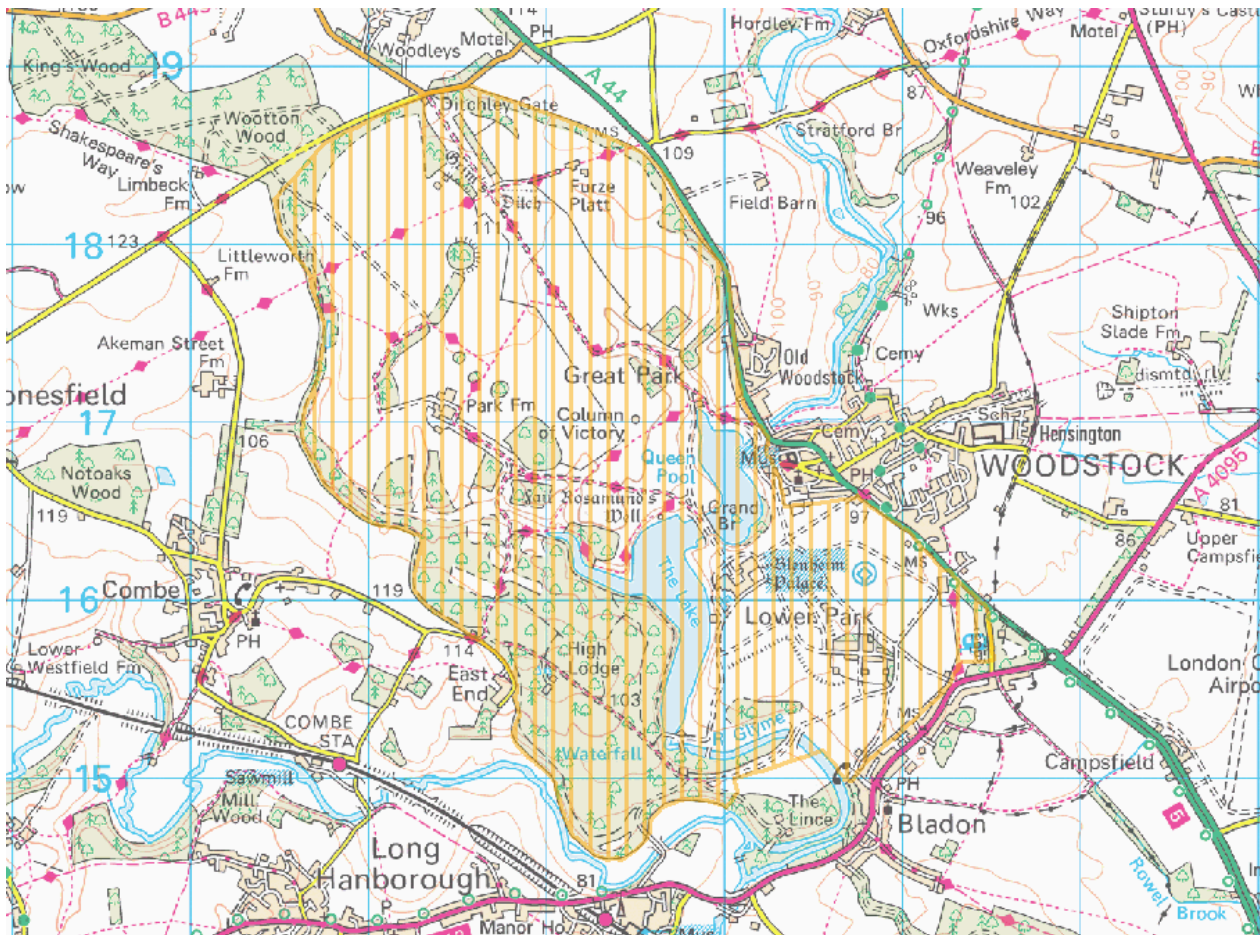
Criterion (iv): Built by the nation to honour one of its heroes, Blenheim is, above all, the home of an English aristocrat, the 1st Duke of Marlborough, who was also Prince of the Germanic Holy Roman Empire, as we are reminded in the decoration of the Great Drawing Room by Louis Laguerre (1719-20).

## Legal

### Statement of Outstanding Universal Value

Draft Statements of Outstanding Universal Value have been submitted by DCMS in February 2011 for consideration by the World Heritage Committee.

World Heritage Site inscribed by the World Heritage Committee of UNESCO in 1987.



## Map

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End of official list entry



# BLENHEIM PALACE

Listed on the National Heritage List for England. Search over 400,000 listed places

(<https://historicengland.org.uk/listing/the-list/>)

## Official list entry

Heritage Category:**Listed Building**

Grade:**I**

List Entry Number:**1052912**

Date first listed:**27-Aug-1957**

List Entry Name:**BLENHEIM PALACE**

Statutory Address 1:**BLENHEIM PALACE**

This List entry helps identify the building designated at this address for its special architectural or historic interest.

Unless the List entry states otherwise, it includes both the structure itself and any object or structure fixed to it (whether inside or outside) as well as any object or structure within the curtilage of the building.

For these purposes, to be included within the curtilage of the building, the object or structure must have formed part of the land since before 1st July 1948.

### [Understanding list entries](#)

(<https://historicengland.org.uk/listing/the-list/understanding-list-entries/>)

## Corrections and minor amendments

**(<https://historicengland.org.uk/listing/the-list/minor-amendments/>)**

# Location

Statutory Address:**BLenheim PALACE**

The building or site itself may lie within the boundary of more than one authority.

County:**Oxfordshire**

District:**West Oxfordshire (District Authority)**

Parish:**Blenheim**

National Grid Reference:**SP4412416055**

# Details

BLenheim SP41NW, SP4416 2/1, 8/1 Blenheim Place 27/08/57 GV I Country house. 1706-29, by Sir John Vanbrugh and Nicholas Hawksmoor for the Duke and Duchess of Marlborough; carvings by Grinling Gibbons and interiors by Laguerre, Thornhill et. al. Limestone ashlar, with rusticated corner towers and details; lead roofs; stone stacks. House has 4 corner towers, and Great Court to north flanked by Stable Court to east and Kitchen Court to west. Baroque style. Two storeys. Sashes to all windows. North front has central 9-bay facade, articulated by giant order of Corinthian pilasters; 3-bay pedimented portico; carving of the Marlborough Arms in tympanum, figures of Britannia and chained slaves on pediment and centurions on parapet by Grinling Gibbons; huge cleft open pediment set behind portico, with clerestory windows to Hall ranged to rear. Quadrants, articulated by Doric engaged columns, link facade to corner towers which have banded rustication, arched windows and bracketed cornices; superstructure to each tower has curved flying buttresses and pinnacles of reversed fleurs-de-lys, piled-up cannon balls and ducal coronets. Colonnades, with engaged Doric columns and carved military achievements by Gibbons, are linked to 11 bay blocks: rusticated

archways, in centre of each block and leading to Kitchen and Stable Courts, are flanked by banded Doric columns and surmounted by carvings of the Lion of England savaging the Cock of France. Clock towers behind each archway have interlocking pediments with ball finial. 7-bay end blocks have rusticated Doric pilasters to pedimented centre of north facades. East and west fronts each have central full-height bow windows, with caryatids to west, and similar corner towers to south. South front has tall 9-bay facade to centre, articulated by giant order of Corinthian pilasters progressing to columns in central portico: entablature of portico surmounted by bust of Louis XIV, taken from the city gates of Tournai after its sack in 1709. Roof has finials and military carvings by Grinling Gibbons.

Kitchen Court to west: castellated parapet, and arcaded to north and south with heavy open-pedimented Doric porches; east gateway, which houses water cistern, has obelisk-shaped pillars resting on cannon balls flanking cast-iron gates of c.1890 and garlands and statues in niches by Sir William Chambers, 1766-75. Orangery to south of Kitchen Court has arcaded front with sashes and heavy Doric porch of 2 orders with open pediment. Great Court in front of palace remodelled. by Achille Duchene in 1910: military trophies, flanking steps in front of portico, carved by Grinling Gibbons; low ashlar walls surrounding Great Court have piers with wheatear festoons over medallions, and flaming urns to piers in angles of south-east and south-west corners; wrought-iron gates to front, flanked by scrolled ironwork panels. Interior: Great Hall, with 3-tier arcades and Corinthian columns and cornices carved by Grinling Gibbons, has ceiling painted by Sir James Thornhill in 1716 which shows Marlborough presenting plan of Battle of Blenheim to Britannia. Vaulted stone corridors link Great Hall to east and west wings. Stairs to left of Great Hall has iron balustrade continued in front of gallery above proscenium arch, with arms of Queen Anne carved by Gibbons, which leads from Hall to Saloon to rear. Saloon: marble fireplace by Townesend; marble doorcases with carved shells to keys by Grinling Gibbons; walls and ceiling decorated 1719-20 by Louis Laguerre. Suite of 3 rooms to left (east) have plasterwork ceilings by Hawksmoor, and marble fireplaces by Sir William Chambers; scrolls, eagles and phoenixes in coving of ceilings of c.1890, Suite of 3 State Rooms to right, (west) of Saloon have tapestries by Judocus de Vos depicting Marlborough's victories, the remainder of the set being elsewhere in the house: fireplaces by Gibbons and Chambers; Rococo decoration of c.1890, with inset portraits set in gilt frames; First State Room has portrait of 9th Duchess by Duran, Second State Room has portrait of Louis XIV by Mignard and Third State Room has portrait of Colonel Armstrong with Marlborough by Seeman. All set in overmantles over fireplaces. The Long Library, "Hawksmoor's finest room", has plasterwork by Isaac Mansfield and marble doorcases and giant order of Doric pilasters with triglyph frieze by Peisley and Townesend; carved wood bookcases; marble fireplaces, by Hawksmoor or William Kent, have pedimented overmantels framing paintings of seascape and

landscape by Wootton after Poussin and Ore surmounted by busts by Rysbrack. Statue of Queen Anne and bust of Marlborough by Rysbrack, the latter on pedestal by Chambers. At ends of Long Library are galleried bays, with consoles supporting pierced balustrades; organ of 1871 to north bay. Corridor to Great Hall has marble basin, probably by Vanbrugh. Private Apartments in East Wing not inspected: central Bow Window Room has wood Corinthian columns and marble fireplace by Gibbons; fireplaces by Chambers in Grand Cabinet and Duchess's Drawing Room. Basement noted as having fireplaces by Gibbons. Chapel: by Hawksmoor, with giant fluted pilasters and plasterwork. Monument to Duke of Marlborough, 1733, designed by William Kent and executed by Rysbrack: Baroque figure composition set in niche with medallion portraits and military trophies to plasterwork panels. Statues of Randolph Churchill, 1895, and 7th Duke of Marlborough, 1883. Organ case, reredos, pulpit and benches by T.G. Jackson, c.1890. The 8th Duke, who succeeded in 1883, was chairman of New Telephone Company and installed earliest domestic phone system in Britain here: late C19 telephone sets in Long Library and estate office in Kitchen Court. Amongst the notable furnishings are: in west corridor, connecting Great Hall to Long Library, C18 Flemish statues of nymph and youth (Parodi workshop); Emperor Vespasian and Caracalla; Cardinal Delfino and Cardinal Borromeo (C18 Italian); in Great Hall are 2 bronze statues by Soldani, removed from East Formal Garden; early C18 statue of Bacchus by Michael Vandervoort; Alexander the Great, partly Roman, and Roman bust of Emperor Hadrian; C18 Emperor Scipio Africanus. Woodstock Park, the site far Blenheim Palace, was presented by Queen Anne to John Churchill, first Duke of Marlborough, to commemorate his decisive defeat of the French army at Blenheim in 1704. As a "Royall and a National Monument" (Vanbrugh) it outclasses English royal palaces and rivals the Baroque palaces of Europe in size and splendour. Important influences were Versailles, medieval castle architecture and Elizabethan architecture especially Wollaton Hall. Amongst the masons employed were the Peisleys and William Townesend, who worked on other buildings in Blenheim Park. (Buildings of England: Oxfordshire: pp459-472; National Monuments Record; D. Green: Blenheim Palace, 1951; K. Downes: Hawksmoor, 1959; K. Downes: Vanbrugh, 1977; Article in Country Life: Vol 25 (1909), pp786-798, 834-844; D. Green and C. Hussey: "Blenheim Palace Revisited", Country Life: Vol 105 (1949), pp1182-6, 1246-1250; D. Green and M. Jourdain: "Furniture at Blenheim", Country Life: Vol.107 (1951), pp1184-6; D. Green and T. Rayson: "Restoring Blenheim Palace", Country Life, Vol.124 (1958), pp1400-01; M. Bennitt, "A Painter on the Grand Scale: Louis Laguerre", Vol 136 (1964), pp226-8; D. Green: "Rysbrack at Blenheim", Vol 149 (1971), pp26-28)

Listing NGR: SP4412416055

## Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number:**252983**

Legacy System:**LBS**

## Sources

### Books and journals

Downes, K, Hawksmoor, (1969)

Downes, K, Vanbrugh, (1977)

Green, D, Blenheim Palace, (1951)

Pevsner, N, Sherwood, J, The Buildings of England: Oxfordshire, (1974), 459-72

'Country Life' in Country Life, (1949), 1182-86

'Country Life' in Country Life, (1949), 1246-50

'Country Life' in Country Life, , Vol. 124, (1958), 1400-01

'Country Life' in Country Life, (1909), 786-798

'Country Life' in Country Life, (1909), 226-8

'Country Life' in Country Life, , Vol. 149, (1971), 26-28

'Country Life' in Country Life, , Vol. 107, (1951), 1184-86

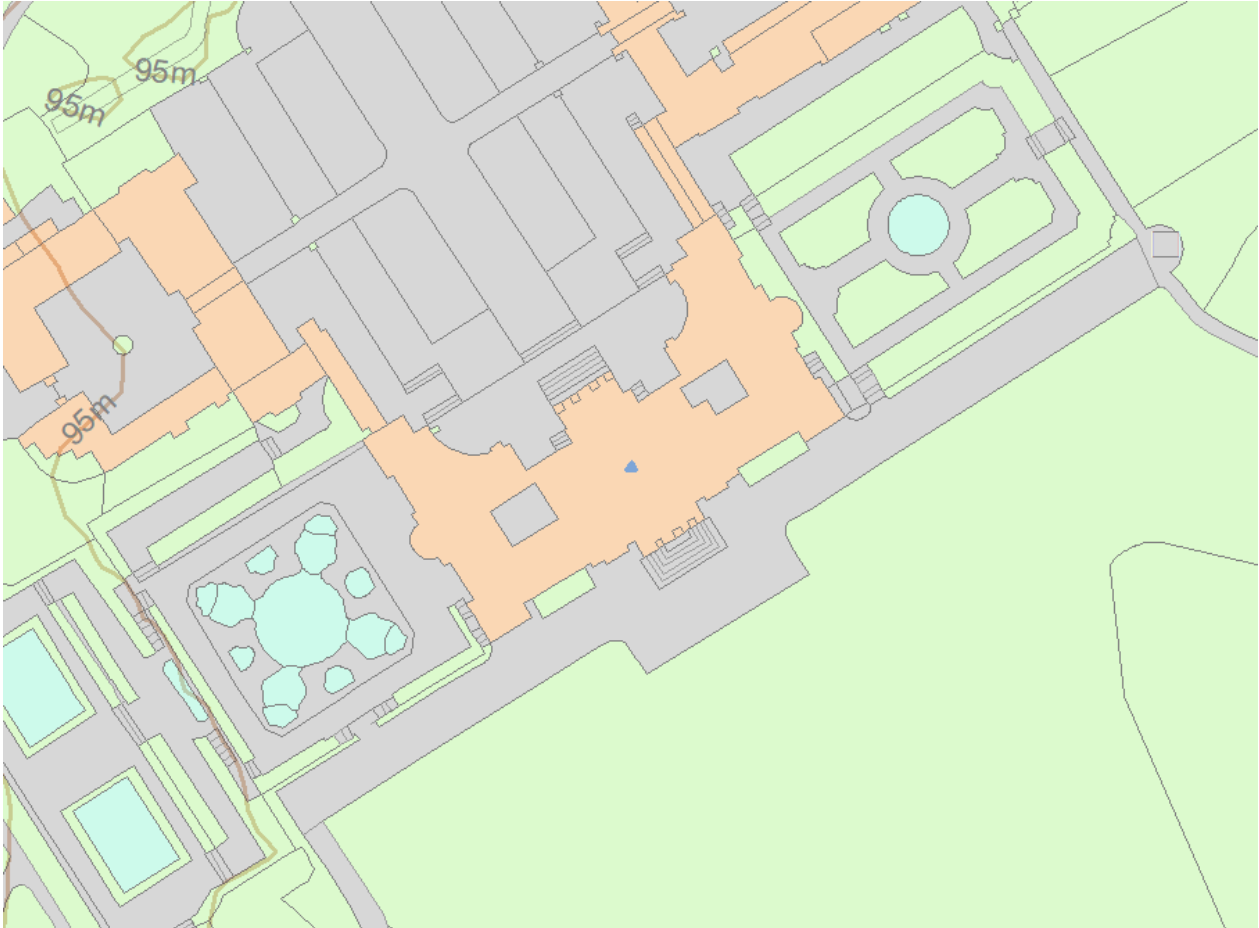
'Country Life' in Country Life, (1964)

### Other

Register of Parks and Gardens of Special Historic Interest in England, Part 34 Oxfordshire

## Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.



## Map

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End of official list entry

# BLENHEIM PALACE

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## Official list entry

Heritage Category: **Park and Garden**

Grade: **I**

List Entry Number: **1000434**

Date first listed: **01-Jun-1984**

This list entry identifies a Park and/or Garden which is registered because of its special historic interest.

### [Understanding registered parks and gardens](https://historicengland.org.uk/listing/what-is-designation/registered-parks-and-gardens/)

(<https://historicengland.org.uk/listing/what-is-designation/registered-parks-and-gardens/>)

### [Corrections and minor amendments](https://historicengland.org.uk/listing/the-list/minor-amendments/)

(<https://historicengland.org.uk/listing/the-list/minor-amendments/>)

## Location

The building or site itself may lie within the boundary of more than one authority.

County: **Oxfordshire**



District: **West Oxfordshire (District Authority)**

Parish: **Bladon**

County: **Oxfordshire**

District: **West Oxfordshire (District Authority)**

Parish: **Blenheim**

County: **Oxfordshire**

District: **West Oxfordshire (District Authority)**

Parish: **Combe**

County: **Oxfordshire**

District: **West Oxfordshire (District Authority)**

Parish: **Woodstock**

National Grid Reference: **SP4348816661**

## Details

A country mansion surrounded by an extensive and complex park and pleasure grounds, created from the medieval royal hunting park of Woodstock. Main phases early and mid C18 and early C20, with early C18 work by Henry Wise and John Vanbrugh, mid C18 work by Lancelot Brown and early C20 work by Achille Duchene.

NOTE This entry is a summary. Because of the complexity of this site, the standard Register entry format would convey neither an adequate description nor a satisfactory account of the development

of the landscape. The user is advised to consult the references given below for more detailed accounts. Many Listed Buildings exist within the site, not all of which have been here referred to. Descriptions of these are to be found in the List of Buildings of Special Architectural or Historic Interest produced by the Department of Culture, Media and Sport.

## HISTORIC DEVELOPMENT

Henry I (1100-35) appears to have first enclosed the park at Woodstock at the beginning of the C12, it subsequently becoming an important royal hunting park. The park was focused on Woodstock Palace, a medieval hunting lodge of C12 origin, occupied by many monarchs and their spouses, who developed the buildings and surrounding gardens.

John Churchill, first Duke of Marlborough, was rewarded by Queen Anne in 1705 for his services in defeating the French in Europe, by the grant of the Royal Manor of Woodstock, given with the understanding that she would build him, at her own expense, a house to be called Blenheim (named after the 1704 victory at the battle of Blindheim, close to the Danube). The former royal hunting park was probably then in poor condition, and the remains of Woodstock Palace were pulled down (despite a letter from Sir John Vanbrugh (1709) to the Duchess pleading for its retention, on grounds of historical association, as an eyecatcher) and its gardens removed.

The new palace, built 1705-22, was designed, together with the monumental Grand Bridge over the little River Glyme, by Sir John Vanbrugh (assisted by Nicholas Hawksmoor), and was set within a great formal garden designed by Henry Wise (1653-1738), Queen Anne's Royal Gardener. Following the Duke's death in 1722, a formal canal scheme designed by Colonel Armstrong, his chief engineer, was implemented by the Duchess along the course of the River Glyme. In 1764 Lancelot Brown (1716-83) was called in, producing a plan to landscape the central core of the park which included flooding the river valley to produce a large lake, and landscaping the surrounds, with new belt plantings around the park boundary. In the early C19 the fifth Duke created a substantial rock garden and series of flower gardens (mostly gone) south of Brown's lake. In the late C19/early C20 the ninth Duke carried out much restoration and replanting within the park, and created formal gardens to the west and east of the house, designed 1908-30 by Achille Duchene. Restoration of park planting has continued during the C20, and the estate remains (1998) in private ownership.

## SUMMARY DESCRIPTION

Blenheim lies c 12km north-west of Oxford, adjacent to the south-west side of the village of Woodstock, within the confines of the medieval Forest of Wychwood. The c 10 sq km site is bounded largely by a c 14km long stone park wall (masons William Townesend and Bartholemew Peisley Junior, c 1720s, listed grade II), apart from a stretch along the south boundary west of Bladon, with to the east the A44 Oxford to Stratford-upon-Avon road and to the south the A4095 road to Witney. The village of Bladon straddles the valley adjacent to the south boundary, the parish church tower being prominent in views from the south front of the house. The park lies at the foot of the Cotswold dip slope, the Great Park in the north half being situated on a high plateau, dropping down to the undulating Lower Park to the south, with the flooded Glyme valley separating the two. The setting is largely rural and agricultural, with the C18 town of Woodstock against the east park wall, its church tower prominent from various points in the park. Numerous other views extend beyond the park from within.

Blenheim Palace (Sir John Vanbrugh 1705-29, listed grade I) stands towards the centre of the park on a level plateau, approached via several drives and avenues. The main approach, directly from Woodstock via the Woodstock Gate, enters the park c 700m north of the Palace, passing through a square, stone-walled court, on the south side of which stands the Triumphal Arch (Nicholas Hawksmoor 1723, listed grade I). The drive emerges into the park, suddenly revealing Brown's lake divided by Vanbrugh's Grand Bridge (1706-12, listed grade I) standing in the valley below. To the north-west the Column of Victory (to a design by Lord Herbert, later ninth Earl of Pembroke, 1727-30, listed grade I) is prominent on high ground across Queen Pool and to the south the roofscape of the Palace is visible, the main facade partially hidden. The drive continues south, with panoramic views across the Glyme valley, joining, 300m north-east of the Palace, the straight drive from the monumental Hensington Gate (1706-10, moved to present position 1770s, listed grade I). This drive enters off Oxford Road 800m north-east of the Palace, being aligned on East Gateway arch at the east end of a series of axially arranged openings between the courtyards north of the Palace. The drive curves north and west from the East Gateway, overlooking the lake, Grand Bridge and Column of Victory beyond, to join the Ditchley Drive at the entrance to the Great Court.

The Ditchley Drive enters the park 3km north of the Palace, flanked by a stone gateway with wrought-iron gates (John Yenn 1781, listed grade II), and a single-storey lodge (c 1860, listed grade II). The

drive, aligned on the Column of Victory, and 1km beyond this the north front of the Palace, runs straight across the Great Park plateau, flanked by a double avenue of limes (replanted late C20 on the site of Wise's early C18 avenue, said to have been originally laid out in the formation of the Battle of Blenheim), being diverted 1.5km from the Palace into the wooded Icehouse Valley to the east, to remerge on the axial line 0.5km from the house. The drive crosses the Grand Bridge, standing 400m from the Palace, with views east to the Triumphal Arch and the buildings of Woodstock beyond the park wall, continuing up the valley side, arriving at a bastion forming the north side of the Great Court (remodelled by Duchene, 1910, to an early C18 pattern). The drive continues through the central gateway flanked by iron gates, crossing the large, level, paved and gravelled forecourt to the steps up to the portico on the north front. Several lesser drives, their entrances marked by lodges, traverse the park.

The Palace is flanked to the east by the Italian Garden (Duchene c 1910, steps listed grade II), containing box-hedged knots with Waldo Storey's central Mermaid Fountain (1900-10, listed grade II), and to the west by the Water Terraces (Duchene 1925-30, listed grade II), based on the Parterre d'Eau at Versailles. The upper terrace contains a series of linked pools within a framework of box hedging, whilst the lower terrace contains two rectangular ponds with central obelisks and fountains (the northern one called the Bernini Fountain, late C17, listed grade I) the whole overlooking the Lake, the hillside beyond, and, glimpsed at the top of the hillside, Brown's remodelled gothic High Park Lodge. South of the Palace, flanked by informal, wooded pleasure grounds containing three stone garden temples, lies an open, level lawn, formerly the site of Wise's Great Parterre (early C18), removed by Brown in the 1760s. Views extend south from the south front and lawn across the Glyme valley to Bladon and its church tower, with distant hills beyond. The east arm of the pleasure grounds leads to the kitchen garden. The west arm of the pleasure grounds leads south to Brown's Cascade, lying c 1km south of the Palace, at the south end of the earth dam retaining the Lake. The large, rocky Cascade, hidden from the main body of the Lake, conducts water back into the enlarged Glyme riverbed as it runs east, crossed by the three-arched New or Bladon Bridge (Sir William Chambers 1773, listed grade I), standing 850m south of the Palace, before curving south and west to leave the park west of Lince Bridge. Laurel Bank, south of the river, seems to contain the remains of pleasure grounds which may have been linked with the former rock and flower gardens lying closer to the south side of the Cascade.

The park is divided into several sections, mostly connected by Brown's Lake and the River Glyme to the

south. The Great Park to the north is largely arable land with woodland clumps, bisected from north to south by the Ditchley Drive and from west to east by the Roman Akeman Street with the remains of Grim's Ditch in the north section, and dominated by the Column of Victory. A tablet marks the site of the former Woodstock Palace, lying c 500m north-west of the Palace on what is now the north bank of the Lake. West of this, 200m west of the Grand Bridge, lies Rosamund's Well, a spring and stone pool marking the site of the former bower created in the mid C12 by Henry II for his mistress, Rosamund de Clifford. By the C15 the site contained a suite of rooms and a cloister surrounding a paved courtyard, through which the spring waters were led through a flight of three pools (Bond and Tiller 1997). This was in ruins by the C16, the remains being sketched by John Aubrey in the C17. High Park, on the hillside west of the Lake, consists largely of ancient oak woodland in which, overlooking the Palace 1km to the north-east, stands High Park Lodge (Brown 1768, listed grade II\*), remodelled in the Gothic style with a central three-storey tower and battlements, on the site of a medieval hunting lodge. The Lower Park and Bladon Park lie to the east and south of the pleasure grounds respectively, largely laid to pasture with many park trees.

The rectangular kitchen garden (masons Thomas Churchill and Richard Stacey, c 1710, listed grade II), covering 3ha, stands 600m south-east of the Palace, with four large, semicircular bastion walls projecting from the north and south walls, and two circular ponds.

REFERENCES Note: There is a wealth of material about this site. The key references are cited below.

N Pevsner and J Sherwood, *The Buildings of England: Oxfordshire* (1974), pp 459-75 D Stroud, *Capability Brown* (1975), pp 111, 218; pls 27-30 *Victoria History of the County of Oxfordshire* 12, (1990), pp 430-70 *Blenheim Palace, guidebook*, (1996) J Bond and K Tiller, *Blenheim, Landscape for a Palace* (rev edn 1997)

Maps R Davis, *A New Map of the County of Oxford ...*, 1797 A Bryant, *Map of the County of Oxford ...*, surveyed 1823

OS 6" to 1 mile: 1st edition published 1878-80 2nd edition published 1900 OS 25" to 1 mile: 1st edition published 1876

Description written: March 1998 Amended: March 1999; April 1999 Register Inspector: SR Edited:

January 2000

## Legacy

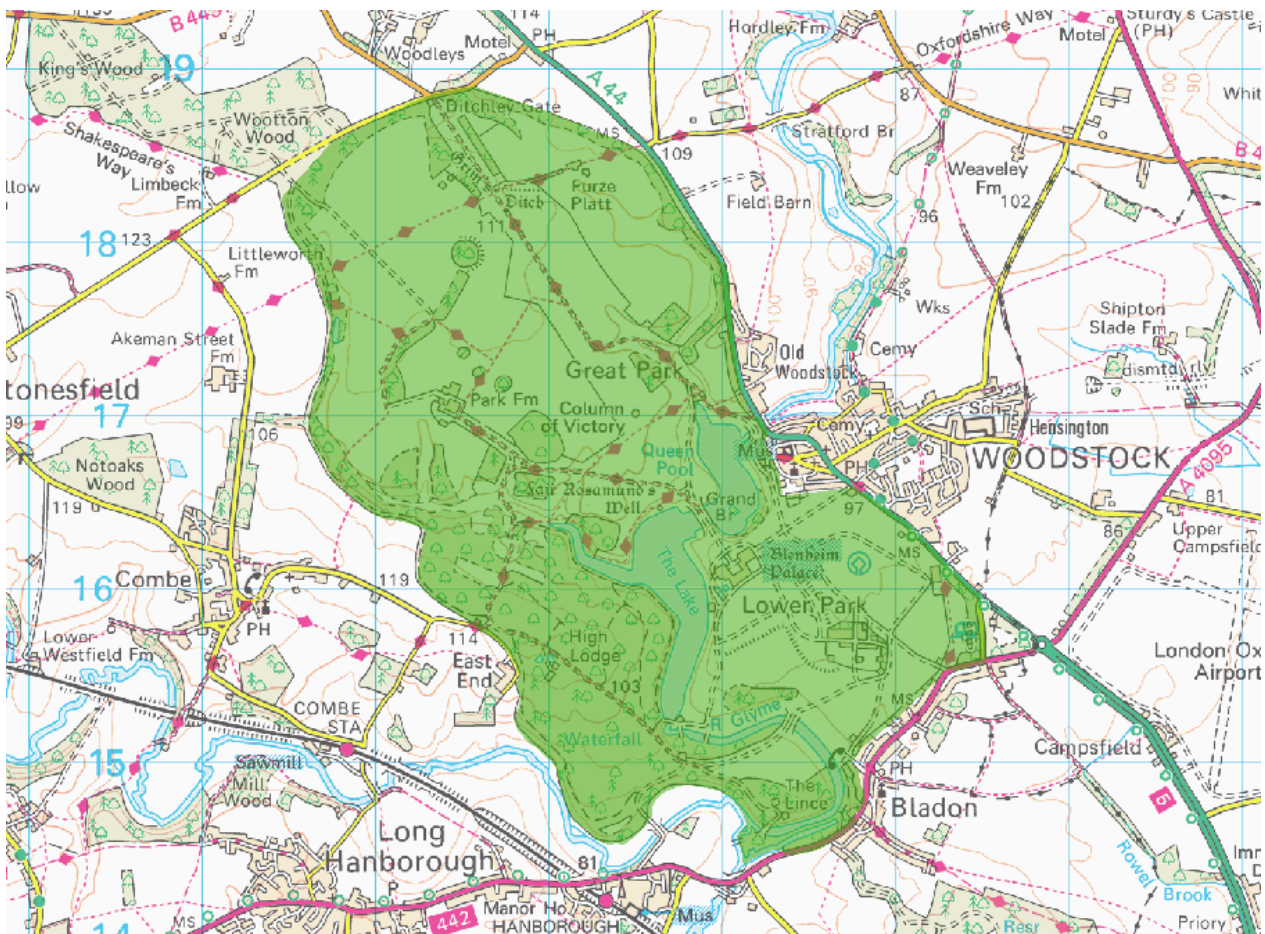
The contents of this record have been generated from a legacy data system.

Legacy System number:1402

Legacy System:Parks and Gardens

## Legal

This garden or other land is registered under the Historic Buildings and Ancient Monuments Act 1953 within the Register of Historic Parks and Gardens by Historic England for its special historic interest.



## Map

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End of official list entry



# Roman villa

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## Official list entry

Heritage Category:**Scheduled Monument**

List Entry Number:**1006346**

## Location

The building or site itself may lie within the boundary of more than one authority.

County:**Oxfordshire**

District:**West Oxfordshire (District Authority)**

Parish:**Tackley**

County:**Oxfordshire**

District:**West Oxfordshire (District Authority)**

Parish:**Woodstock**

National Grid Reference:**SP 45228 18913**

## Summary

Not currently available for this entry.

## Reasons for Designation

Not currently available for this entry.

## History

Not currently available for this entry.

## Details

This record has been generated from an "old county number" (OCN) scheduling record. These are monuments that were not reviewed under the Monuments Protection Programme and are some of our oldest designation records. As such they do not yet have the full descriptions of their modernised counterparts available. Please contact us if you would like further information.

## Legacy

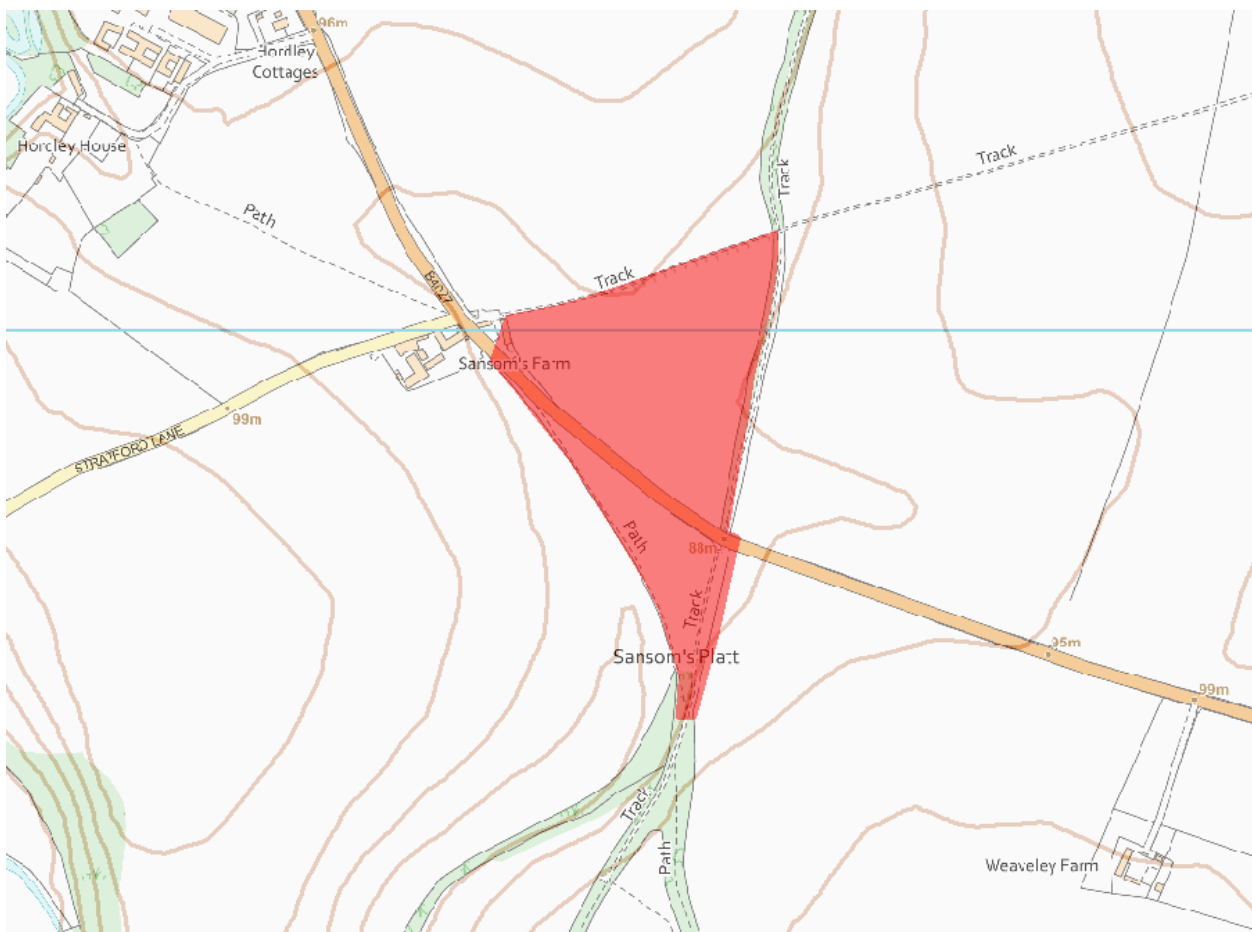
The contents of this record have been generated from a legacy data system.

Legacy System number:**OX 150**

Legacy System:**RSM - OCN**

## Legal

This monument is scheduled under the Ancient Monuments and Archaeological Areas Act 1979 as amended as it appears to the Secretary of State to be of national importance. This entry is a copy, the original is held by the Department for Culture, Media and Sport.



## Map

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End of official list entry

# CHURCH OF ST PETER AND ST PAUL

Listed on the National Heritage List for England. Search over 400,000 listed places

(<https://historicengland.org.uk/listing/the-list/>)

## Official list entry

Heritage Category:**Listed Building**

Grade:**I**

List Entry Number:**1052991**

Date first listed:**12-Sep-1955**

List Entry Name:**CHURCH OF ST PETER AND ST PAUL**

Statutory Address 1:**CHURCH OF ST PETER AND ST PAUL**

This List entry helps identify the building designated at this address for its special architectural or historic interest.

Unless the List entry states otherwise, it includes both the structure itself and any object or structure fixed to it (whether inside or outside) as well as any object or structure within the curtilage of the building.

For these purposes, to be included within the curtilage of the building, the object or structure must have formed part of the land since before 1st July 1948.

[Understanding list entries](https://historicengland.org.uk/listing/the-list/understanding-list-entries/) (<https://historicengland.org.uk/listing/the-list/understanding-list-entries/>)

## Corrections and minor amendments

(<https://historicengland.org.uk/listing/the-list/minor-amendments/>)

# Location

Statutory Address:**CHURCH OF ST PETER AND ST PAUL**

The building or site itself may lie within the boundary of more than one authority.

County:**Oxfordshire**

District:**West Oxfordshire (District Authority)**

Parish:**Hanborough**

National Grid Reference:**SP 42582 12837**

# Details

HANBOROUGH CHURCH HANBOROUGH SP4212 24/118 Church of St. Peter and 12/09/55 St. Paul GV  
I Church. Early C12 with mid C13 alterations; remodelled c1400, when tower and clerestorey were added. Coursed limestone rubble; shallow-pitched lead roofs. Chancel, aisled nave and west tower. Label mould with head corbels of King and Queen over late C19 three-light window; roll-moulded string course beneath sills of this east window and 2 early C13 pointed lancets to south; C12 chamfered and round-arched doorway to ancient (probably C15) studded door. North chapel, continued as north aisle, has one-light window and label mould over C14 two-light trefoil-headed window to east, mid C13 pointed lancet, and label mould with head stops over c1400 three-light trefoil-headed window; north aisle to nave has early C13 pointed lancet, mid C13 two-light geometrical window, a small late C12 round-arched lancet and a c1400 two-light window with panel tracery. Early C13 north porch has archway of 3 orders, with hollow-chamfered arch set on triple jamb shafts; C17 studded double doors, with strap hinges. Fine early C12 north doorway with zigzag-carved hood over roll-moulded arch set on jamb shafts with scalloped capitals; very fine tympanum

carving of St. Peter, the Agnus Dei and Lion of St. Mark; C17 studded door with strap hinges and fittings. Norman lancet at west end of aisle. South aisle: Norman lancet at east end, label moulds over two c1400 three-light ogee-headed windows; a late C19 two-light window and hood mould over c1400 two-light window with panel tracery. C17 south porch has timber lintel over plank studded door with label moulds set in ovolo-moulded wood architrave; C12 round-arched doorway. c1400 three-stage west tower: large offset buttresses; hood mould over 3-light window with panel tracery above label mould over 2-centred doorway set in casement-moulded architrave; 2-light belfry windows; moulded string course with corner gargoyles beneath parapet with carved quatrefoils; ribbed ashlar spire. C15 clerestory with Perpendicular windows. Interior: C15 piscina in vestry, mid C13 string course carried around chancel; C15 trefoiled piscina and segmental arch over C15 studded door to south; C12 round-arched aumbry, square aumbry and pointed chamfered arch over fine C15 studded door with iron hinges and fittings to north; late C17 communion rail with turned balusters; bases of two mid C13 jamb shafts flank east window; C15 three-bay chancel roof. C15 double-chamfered archway to north chapel and mid C13 hollow-chamfered archway to south chapel which has ogee-headed piscina and stone steps with ancient plank door to former rood loft; mid C13 chancel arch set on shafts with moulded capitals. Nave has C15 three-bay arcades with concave-moulded capitals and octagonal piers; 3-bay C15 roof with moulded tie beams arch-braced to C15 head corbels; restored C15 polygonal pulpit set on narrow stem and with some C15 panel tracery. Very fine late C15 rood screens, to chancel and aisles, with much late C15 gold, red and black painted decoration; traceried heads to open panels, blind tracery and coving of rood lofts in aisles with vine-leaf trail to frieze on south side. North aisle has stoup with billeted sill and south aisle has plain aumbry; C17 lean-to roofs in aisles. Late C17 decoratively-carved parish chest at west end of nave. Wall painting: 2 trefoil-headed recesses in north aisle have fine C15 paintings of white roses on a red background. Monuments: Arched recess in north wall of chancel has brass to Dr. Alexander Belsyre (d.1567) depicting corpse in shroud. Chancel also has small floor brasses to Joanna Mericke (d.1617) and Walter Culpepper, (d.1616); Marble wall monument, surmounted by urn, to Thomas Smith (d.1729) and family; Baroque cartouches to William Denison (d.1756) and Anna Maria Denison (d.1751), the latter with unusual rococco shape to tablet; north wall has broken-pedimented wall tablet to Jane Culpepper, (d.1636), and wall monument with Ionic pilasters and heraldic shields erected 1632 to memory of Margaret Clarke, (d.1592). Various late C17 and C18 ledger stones. Late C15 brass to Jane Ford and 2 husbands at east end of nave. White marble wall tablet with urn erected 1780 by William Bouchier in memory of his wife and parents, at east end of north aisle; two C18 lead tablets at west end of nave. Stained glass: 2 late C15 tracery lights with Tudor roses set in foliate background, at in south-east

window of south aisle. Subsidiary features: tapered C14 grave slab attached to south side of chancel.  
(Buildings of England: Oxfordshire: p543-4; National Monuments Record; Bodleian Library,  
Topographical Drawings, for C19 drawings by R.C. Buckler and others)

Listing NGR: SP4258312839

## Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number:**252772**

Legacy System:**LBS**

## Sources

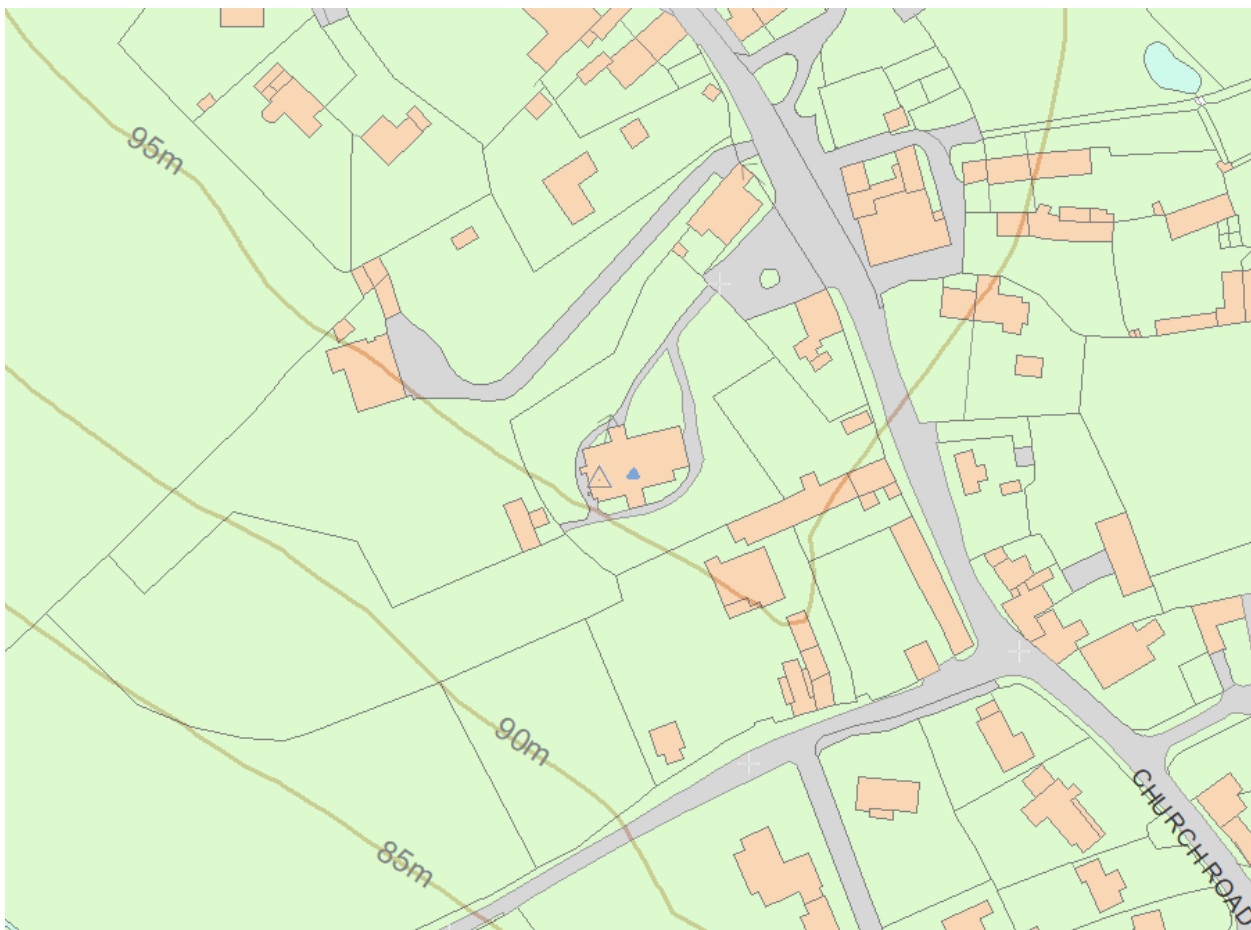
### Books and journals

Pevsner, N, Sherwood, J, The Buildings of England: Oxfordshire, (1974), 543-4

## Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.





## Map

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# CHURCH OF ST PETER

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## Official list entry

Heritage Category:**Listed Building**

Grade:**I**

List Entry Number:**1367949**

Date first listed:**12-Sep-1955**

List Entry Name:**CHURCH OF ST PETER**

Statutory Address 1:**CHURCH OF ST PETER, CHURCH LANE**

This List entry helps identify the building designated at this address for its special architectural or historic interest.

Unless the List entry states otherwise, it includes both the structure itself and any object or structure fixed to it (whether inside or outside) as well as any object or structure within the curtilage of the building.

For these purposes, to be included within the curtilage of the building, the object or structure must have formed part of the land since before 1st July 1948.

[Understanding list entries](https://historicengland.org.uk/listing/the-list/understanding-list-entries/) (<https://historicengland.org.uk/listing/the-list/understanding-list-entries/>)

## Corrections and minor amendments

(<https://historicengland.org.uk/listing/the-list/minor-amendments/>)

# Location

Statutory Address:**CHURCH OF ST PETER, CHURCH LANE**

The building or site itself may lie within the boundary of more than one authority.

County:**Oxfordshire**

District:**West Oxfordshire (District Authority)**

Parish:**Cassington**

National Grid Reference:**SP 45474 10604**

# Details

CASSINGTON CHURCH LANE SP4510 (South side) 25/29 Church of St. Peter 12/09/55 GV I Church. Built shortly before 1123 for Geoffrey de Clinton. Altered in early C14 for Lady Mantaate, who added upper stage and broach spire to the tower. Restored 1876/7 by Bodley and Garner. Rendered limestone rubble with ashlar quoins and dressings; stone-coped gabled stone slate roofs. Chancel and nave with central tower. Early C14. Curvilinear 2-light east window; early C12 round-arched window with roll-moulded inner arch and billeted sill to north; C15 three-light cinquefoil-headed window to south, which also has late C19 vestry with Gothic doorway and ogee-headed lights; chancel also has fine corbel table of human and animal heads. 3-stage central tower: early C11 stair-turret and round-headed doorway to north, and C15 three-light window with panel tracery to south; second stage has early C14 pointed-arched cinquefoiled light to south and similar trefoil-headed light with trefoiled head to north; upper stage has early C14 two-light Y-tracery belfry lights, and reset early C12 head corbels reset beneath quatrefoil-panelled parapet; ribbed broach spire has gabled lucarnes. Nave: north side has, from east, an early C14 curvilinear 2-light window, and 2 early C12 round-headed windows with

billeted sills; gabled early C14 north porch has hood mould over chamfered doorway with imposts; mutilated early C12 south doorway, with plain tympanum, frames studded C17 door. South side has, from east, an early C14 Curvilinear 2-light window and an early C12 round-arched window with billeted sill; C17 studded door set in early C12 south doorway, which has roll-moulded cushion capitals. Gabled C15 south porch has open timber arcade of trefoiled lights to each side, and arch-braced common-rafter roof. Early C14 three-light Curvilinear west window with flowing tracery. Nave has fine early C12 corbel table, with similar variety of carved heads to those of chancel. Interior: chancel has early C12 quadripartite stone vault, supported on corner shafts with cushion capitals. Early C14 double piscina has reticulated tracery. Early C18 communion rail, with elaborately carved turned balusters; C17 panelled dados in sanctuary. C15 chancel screen has lower plank partition carved with blind tracery, and renewed top and cusped heads. Early C12 tower arches each have zig-zag carved hood over 2 orders of roll moulding set on jamb shafts with cushion capitals. Plain early C12 doorway to tower stairs. Fine Jacobean stalls, much renewed in C19, brought here in 1870s from Christ Church Cathedral, Oxford. Nave has mid C19 pulpit with traceried panels, on early C12 tub font and 18 ancient benches, probably C15, with bench ends of chamfered panels with central muntin. Two fine C18 brass chandeliers. Wall paintings: fragments survive on east chancel wall, and of C14 canopied figures at east end of nave; parts of C14 Doom painting over tower arch, and fragments of early C12 painted consecration crosses at west end of nave. Monuments: three C19 wall tablets; floor brass at east end of nave commemorates Roger Cheyne, d.1414, and has simple foliated cross; brass to Thomas Neal, d.1590, depicts shrouded figure; mid C18 Cosier monument on north wall of nave is set in architectural frame; similar monument to south, surmounted by urn and with winged cherub's head, commemorates Francis Seale, d.1720. Stained glass: east window of 1848. In chancel north window is C16 armorial glass and C16 Flemish rounder depicting Story of Joseph. East windows of nave have C14 roundels of head of Christ and 2 deacon saints to south and C16 Flemish glass to north. Late C19 west window has reset C16 to C18 Flemish glass. (Buildings of England: Oxfordshire, pp522-3; National Monuments Record; Bodleian Library, Topographical Drawings, for drawings of late C18 onwards including details by R.C. Buckler)

Listing NGR: SP4546810601

## Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number:252682

Legacy System:LBS

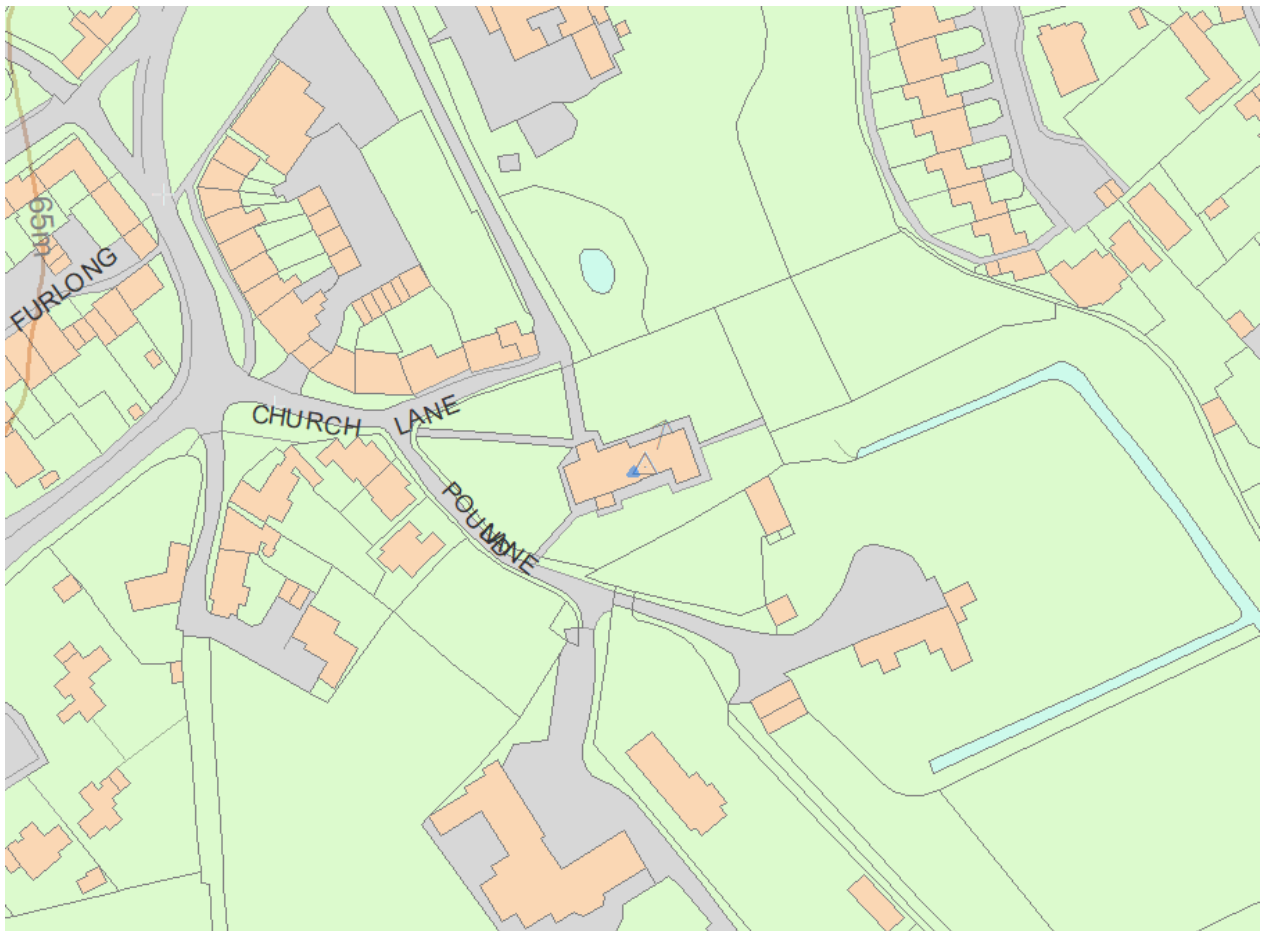
## Sources

### Books and journals

Pevsner, N, Sherwood, J, The Buildings of England: Oxfordshire, (1974), 522-3

## Legal

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# CHURCH OF ST MICHAEL

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## Official list entry

Heritage Category:**Listed Building**

Grade:**II\***

List Entry Number:**1291232**

Date first listed:**07-Dec-1966**

List Entry Name:**CHURCH OF ST MICHAEL**

Statutory Address 1:**CHURCH OF ST MICHAEL, ST MICHAEL'S LANE**

This List entry helps identify the building designated at this address for its special architectural or historic interest.

Unless the List entry states otherwise, it includes both the structure itself and any object or structure fixed to it (whether inside or outside) as well as any object or structure within the curtilage of the building.

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[Understanding list entries](https://historicengland.org.uk/listing/the-list/understanding-list-entries/) (<https://historicengland.org.uk/listing/the-list/understanding-list-entries/>)



### Corrections and minor amendments

(<https://historicengland.org.uk/listing/the-list/minor-amendments/>)

## Location

Statutory Address:**CHURCH OF ST MICHAEL, ST MICHAEL'S LANE**

The building or site itself may lie within the boundary of more than one authority.

County:**Oxfordshire**

District:**Cherwell (District Authority)**

Parish:**Begbroke**

National Grid Reference:**SP 46846 13942**

## Details

BEGBROKE ST. MICHAEL'S LANE SP4613 (East side) 11/7 Church of St. Michael 07/12/66

GV II\*

Church. Late C12; C19 restorations. Coursed limestone rubble, mostly roughcast to nave and chancel; stone-coped gabled stone slate roofs, and saddleback roof to tower. Chancel, nave and west tower. Mid C19 Norman-style east window; similar window and label mould over C15 one-light window to south side of chancel. Two-bay nave has C19 two-light Perpendicular-style windows; C17 plank door with strap hinges set in late C12 south doorway, which has zigzag-carved arch set on zigzag-and spiral-carved columns with cushion capitals; C17 sundial to south wall. 3-storey tower has Norman windows and early C14 two-light Decorated bell-openings; C14 gargoyles to corners. Interior: late C15 ambry in north wall of chancel has fine cupboard with trailing vines carved on door and openwork grille, and C15 hinges and lock. Chancel arch, remodelled in 1845, has round arch set on late C12

lozenge and spiral jamb shafts. C15 octagonal font with sunk quatrefoils to base. Fine C17 panelled door to tower. Nave has C17 three-bay roof with arch-braced collar trusses and moulded tie beams. Monuments: chancel has C17 and C18 ledger stones; late C18 Cockin family tablet; memorial to Robert Fitzherbert, d.1636, has shield set in pediment over black-slate inscription flanked by pilasters and with carved skull to apron. Stained glass: in chancel and nave windows are fragments of C15 and C16 glass, C17 armorial glass and armorial glass by T. Willement, 1827, and C16-17 Flemish glass. (Buildings of England: Oxfordshire; p449; National Monuments Record)

Listing NGR: SP4684613942

## Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number:**393697**

Legacy System:**LBS**

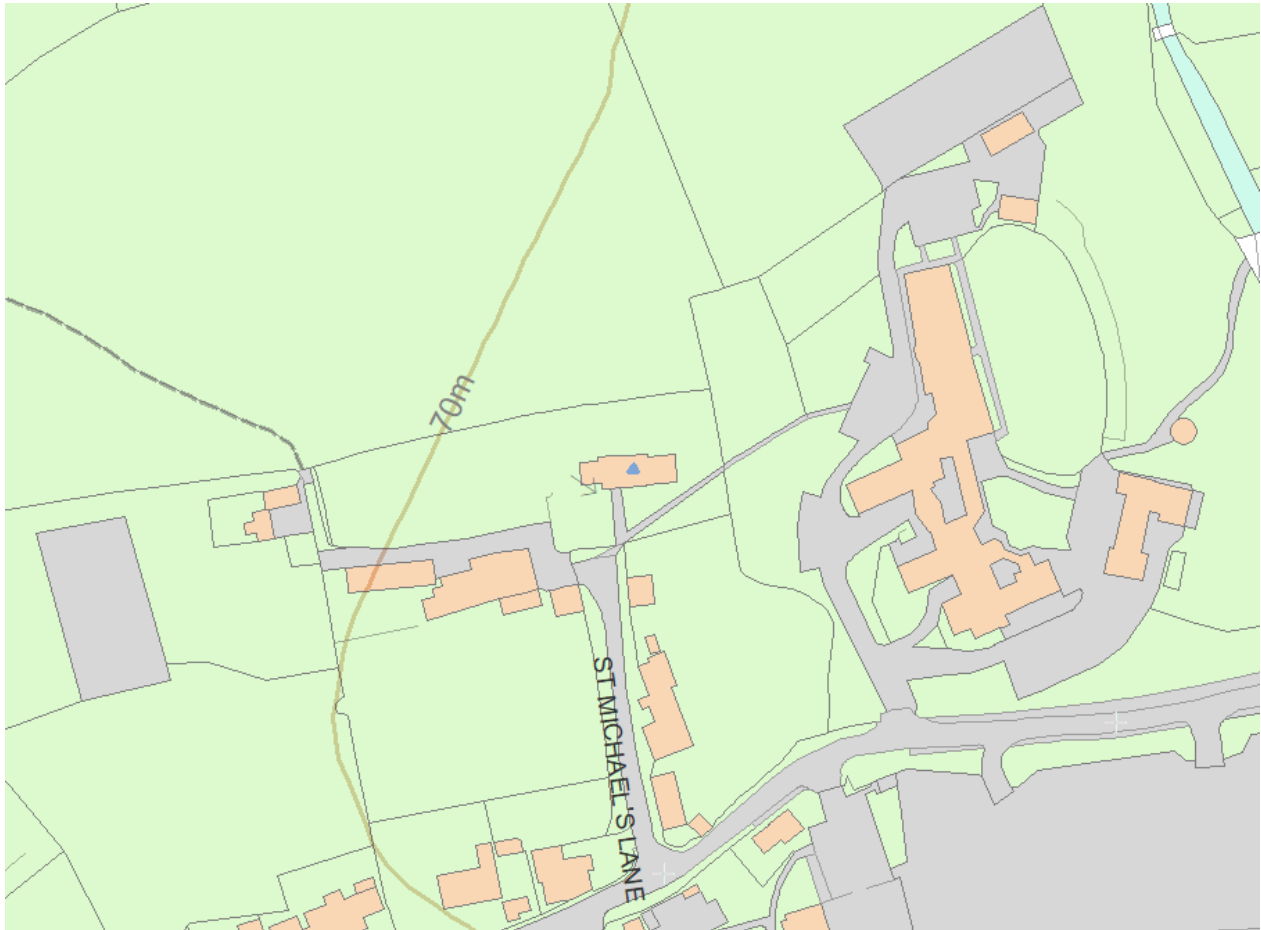
## Sources

### Books and journals

Pevsner, N, Sherwood, J, The Buildings of England: Oxfordshire, (1974), 449

## Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.



## Map

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**Appendix 2 - Blenheim Palace World Heritage Site Management Plan  
(see next page)**





# BLENHEIM PALACE WORLD HERITAGE SITE

REVISED MANAGEMENT PLAN 2017



BLENHEIM PALACE



United Nations  
Educational, Scientific and  
Cultural Organization



Blenheim Palace  
inscribed on the  
World Heritage List





## ATTRIBUTES WHICH HELP CONVEY THE OUV

**5.02** At the same time as developing the Statement of Outstanding Universal Value which was formally adopted by UNESCO, an informal set of attributes for the site were identified. Attributes are aspects or values which help convey or express the OUV and provide some further detail. The attributes identified for Blenheim Palace were:

- *Attribute 1.* It remains the home of the same aristocratic family, the successive Dukes of Marlborough, for whom it was built.
- *Attribute 2.* It still contains the unique early 18th century architecture of the Palace and its associated assemblage of buildings together with an archive of original survey and building documentation
- *Attribute 3.* It is still set within the early 18th century grand Vanbrugh landscape overlaid by Lancelot Brown's masterpiece of English Landscape style design, internationally considered to be the 'English Versailles'.
- *Attribute 4.* The surviving special relationship between the important architectural elements and their landscape setting are an exceptional piece of design and, together are greater than the sum of their parts.
- *Attribute 5.* The UK has by far the greatest concentration of veteran trees in northern Europe and within High Park, which sits in the south-west section of Blenheim Park, is one of the finest areas of ancient oak-dominated woodland in the country. It is partially descended from the ancient Wychwood Forest, a 12th century deer park and an Anglo-Saxon chase.



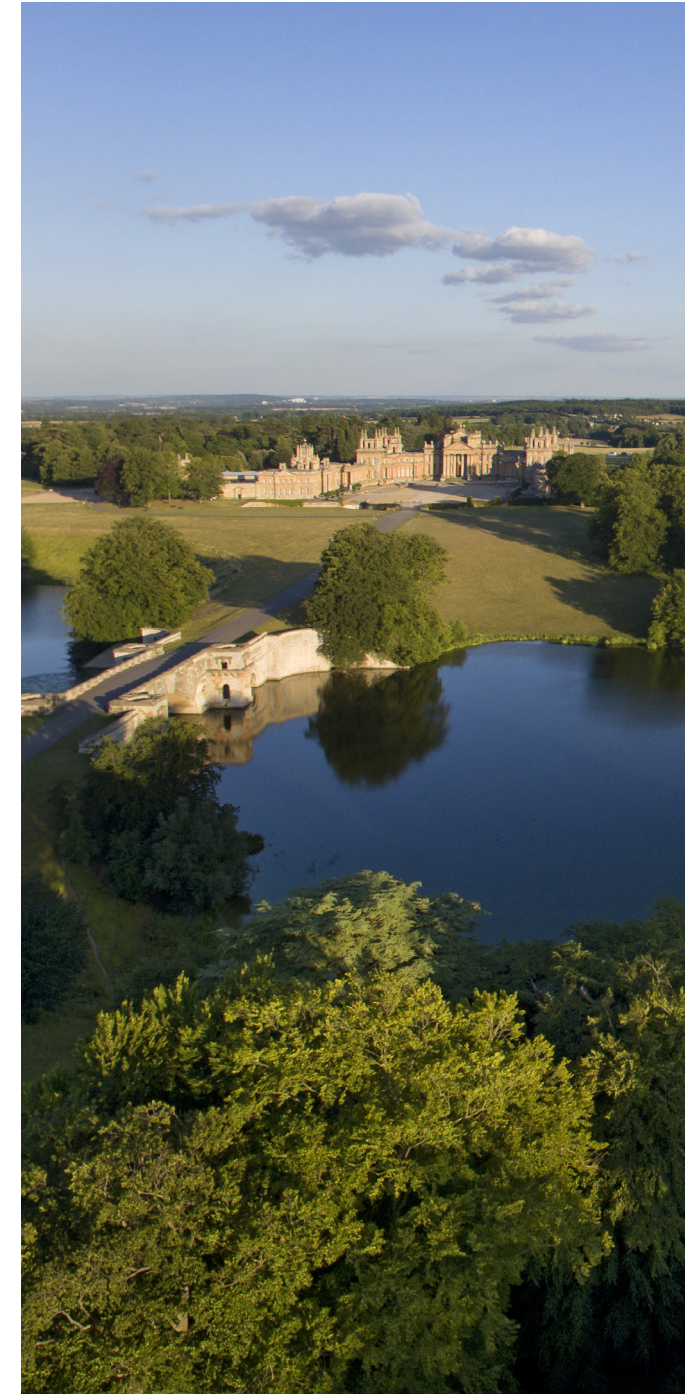
- *Attribute 6.* The gardens and pleasure grounds which surround the Palace were partly designed by Lancelot Brown in the mid 18th century, and partly by the French landscape architect Achille Duchene at the start of the 20th century.
- *Attribute 7.* The park retains a complete, 18th century enclosing stone wall which protects its integrity, but views into and out of the site still provide key linkages between Blenheim Palace and the traditional English countryside and villages surrounding it.

## UNDERSTANDING THE ATTRIBUTES

### *Attributes 1 and 2*

**5.03** John Churchill, 1st Duke of Marlborough, was a figure of international importance. On August 13, 1704, with the help of Prince Eugene, he won a decisive victory over the French and Bavarian troops at Blindheim, near Hochstadt. After a long campaign in the War of the Spanish succession, it was clear that this battle would decide the future of Vienna and the Empire. In England Marlborough's victory was greeted as the greatest since Agincourt, while on the Continent he was revered for all he had done to save Europe from the dictatorship of Louis XIV. As an expression of the English nation's gratitude Queen Anne bestowed on him the royal property of Woodstock, one of the oldest royal properties set in the heart of a forest, and on this site a colossal palace was erected to honour this great hero. The palace at Blenheim is an expression of national power, a symbolic statement of military dominance and a work of art. Certain buildings such as temples, memorials, and centres of government have always been surrounded by material symbols and architectural display. These various types of building can be classified as 'intended monuments' of which Blenheim Palace is clearly one, and their cultural value is made even more prominent by a more recent

disinclination to create similar buildings. They are, in short, works of deliberate 'historic landmark'. It is clear that Vanbrugh, Hawksmoor and Marlborough had in mind the Aristotelian concept of magnificence when Blenheim Palace was conceived, meaning that it was intended as an architecturally distinguished large-scale public building of magnificence (and not for the luxury of the inhabitant). Thus Blenheim Palace is a building which together with the Park and accompanying structures, statuary etc, is intended as a celebratory monument, ultimately to British liberty, and is vested with symbolic significance and manifestly intended to be a permanent memorial. We ascribe intangible values to a place which reminds us of the magnitude of Marlborough's battle victories and this form of historical association can be strong enough to promote any building – whether modest or magnificent – to the status of a revered monument. In Blenheim Palace, however, we have both an extraordinary piece of architecture and one that, because of its associations with the significant military achievements of the 1st Duke, evokes strong passion and becomes a symbol of cultural identity, to be cherished and celebrated. The Palace was also a creation of the Whig dynasty – the dominant political party of the time who believed primarily in civil and political liberty. The party, which rose to dominance in 1688, was supported by many merchants and landowners. Vanbrugh and Hawksmoor saw the opportunity to highlight in architectural form the new 'Golden Age' of the Whigs. There was, at least in some quarters of the country, an expectation of architectural supremacy under Queen Anne, echoing the military domination achieved under Marlborough. Ornamentation and landscape played their role in expressing the Whig cause with Blenheim Palace and its landscape seeking to express freedom and surpass established Tory nobility. Thus the Palace dominates its landscape and was designed to be the focus of all important views and allegorical journeys.





**5.04** The design of Blenheim Palace illustrates the beginnings of the English Romantic Movement, which was characterised by the eclecticism of its inspiration. Its designers rejected the French classical influence and instead returned to national sources and a love of nature from which to inspire the designs for the new Palace. The influence of Blenheim Palace on architecture in the C18 was greatly felt both in England and abroad. The architectural handling of the Palace was intended from the start to convey the magnificence and virtue of its patron. It is a celebration of European Baroque given English expression through its bold square form. Blenheim Palace has what Vanbrugh termed his 'castle air', noble and masculine but with a romantic notion of the medieval past, yet all decorated with classical motif. This style evoked medieval forms, the heavy massing of the building and a romantic silhouette but was combined with baroque advance and recession of forms and a sense of theatre to provide a distinct architectural style. The selection of Vanbrugh as architect probably ensured a scheme which had echoes of Castle Howard. The plan format of this type of design had its origins in the royal and private palaces built in Britain since the 1680s, but at Blenheim Palace Vanbrugh took it to a new level and enhanced the whole building with military symbolism. This overall design is one of the unique elements about the Palace, which gives it outstanding universal value. By combining design sources, including Italian Renaissance, English medieval and Elizabethan influences, but adding a romantic element, Vanbrugh and Hawksmoor created the unique qualities of Blenheim Palace.

#### *Attributes 3, 4 and 7*

**5.05** For some 30 years between 1753 and his death, Lancelot 'Capability' Brown was unrivalled in the realm of landscape design. He took the foundations for a new naturalistic landscape which had been laid by William Kent and to this he added his own artistic

talents, thus creating the 'English Landscape Style' which spread across the whole country and from there into Europe. It was a form of landscape art which, in its organisation of space, was to stretch in its influence well beyond the shores of Britain in the 18th and 19th century and Blenheim Park is a supreme example. Across the channel, examples of 'English Gardens' began to appear, for example the Englischer Garten created in the heart of Munich in 1789 for the Elector Karl Theodor. The handling of large expanses of water, the creation of dams, the sensitive sculpturing of pastoral landforms and the planting of thousands of trees became Brown's signature and can be seen again and again in the many parks he transformed. Two interlocking qualities give the landscape of Blenheim Palace its outstanding universal value. It is an exemplar of the English Landscape Style, displaying some of Lancelot Brown's most famous devices, including the magnificent artificial river and lake system. Underlying and united by this design, which he began in 1761, are many elements which Brown retained from the original landscape setting of the Palace. Lancelot Brown absorbed both the ancient landscape of veteran oaks, and many elements of the grand early 18th century formal design into his masterpiece. These elements include:

- The tall stone park wall, following a drawing by Townsend and built at the same time as the Palace, which still encloses most of the 14.5km length of the park boundary, along which were planted sinuous and enclosing shelterbelts of trees.
- Avenues east from the Palace, though not the original trees, still follow the original alignment, and there is a short length of a mainly original lime avenue in the south of Lower Park.
- The 2.25km long Grand Avenue still exists although its layout differs from the original.







**5.06** This landscape was achieved in such a seamless totality that its overall significance at Blenheim Palace could be overlooked. As Mavor wrote of Brown in his Preliminary Essay to his 'Guide to Blenheim' "some of his most capital performances have been ascribed to chance" (10th edition 1817). Nonetheless the importance of Blenheim Park as an exemplar of Brown's work has been widely recognised internationally:

- Thomas Jefferson, who found the pleasure grounds uninteresting, wrote "the water here is very beautiful, and very grand, the cascade from the lake a fine one". (Memorandums made on a tour of some of the gardens of England 1786).
- Prince Puckler-Muskau's view was that: "*One cannot help admiring the grandeur of Brown's genius and conceptions, as one wanders through these grounds: he is the Shakespeare of gardening*" (from Tour in Germany, Holland and England 1826-28).
- Dorothy Stroud wrote: "The damming of this little river to form two great lakes in keeping with the vast scale of the house was one of Brown's masterpieces, and its success is in no small measure due to retaining Vanburgh's bridge" and "Contemporary critics were unanimous in their praise of Blenheim". (from Capability Brown, Faber and Faber 1984)

The numerous early 19th century prints and pictures of Blenheim Park, particularly of the surroundings of the lakes north of the Palace, confirm this admiration.

**5.07** Blenheim Park is the setting for Blenheim Palace and a number of outlying structures. These are of intrinsic value in themselves, in addition to their role

as the focal points of the designed parkland. The Palace and Grand Bridge, both designed by Vanbrugh, Hawksmoor's Triumphal Arch from Woodstock town, Hensington Gate and the Column of Victory are an ensemble of English Baroque buildings. Their value derives both from their theatrical splendour and from their association with great European personalities. In addition, the following play a particular role in the parkland landscape: High Lodge, remodelled probably by Brown as a castellated romantic house, originally intervisible from the Palace; the Park Farm complex, also by Brown, now surrounded by other later structures; Bladon or New Bridge, designed by William Chambers who is also responsible for the Temple of Diana in the Pleasure Grounds; the Lince Bridge, probably by Brown together with the elegant Lince House (probably by Chambers); two other temples and a grotto in the Pleasure Ground as well as two early iron bridges above and below the cascade; Fair Rosamund's Well and the ha-ha's.

#### *Attribute 5*

**5.08** The UK has by far the greatest concentration of veteran trees in northern Europe, and within High Park, which sits in the south-west section of Blenheim Park, is one of the finest areas of ancient oak dominated woodland in the country. It is partially descended from the ancient Wychwood Forest, a 12th century deer park, and an Anglo-Saxon chase, and is full of veteran trees, many several centuries old. Such ancient woodland, with so many veteran trees, is now a rare landscape phenomenon in northern Europe. Some of the ancient trees are thought to be over 500 years old. This cultural value is enhanced by the fact that natural regeneration of the veteran oaks has been encouraged by the 11th Duke.



*Attribute 6*

**5.09** The gardens and Pleasure Ground, which also date from the early and mid 18th century phase of landscaping still retains some of the trees which were planted at this time. They have, through maturity, acquired significance in themselves, in particular the Cedars of Lebanon and some of the beech, although these are now close to the end of their lives. The surroundings of the Palace were remodelled in the first third of the 20th century. First, the 9th Duke had the north forecourt splendidly remodelled to a layout believed to have been reflective of Vanbrugh's original intention. He then, also with the help of the French landscape architect, Achille Duchene, designed the formal gardens south-east and south-west of the Palace. These are amongst the finest formal gardens of the early 20th century and perhaps Duchene's masterpiece and together with the mature trees and buildings in the grounds provide us with tangible evidence of World Heritage Site's Outstanding Universal Value.





WHC.24/01

31 July 2024

# **Operational Guidelines for the Implementation of the World Heritage Convention**

UNITED NATIONS EDUCATIONAL, SCIENTIFIC  
AND CULTURAL ORGANIZATION



INTERGOVERNMENTAL COMMITTEE  
FOR THE PROTECTION OF THE  
WORLD CULTURAL AND NATURAL HERITAGE

WORLD HERITAGE CENTRE

73. States Parties are encouraged to harmonize their Tentative Lists at regional and thematic levels. Harmonization of Tentative Lists is the process whereby States Parties, with the assistance of the Advisory Bodies, collectively assess their respective Tentative List to review gaps and identify common themes. The harmonization has considerable potential to generate fruitful dialogue between States Parties and different cultural communities, promoting respect for common heritage and cultural diversity and can result in improved Tentative Lists, new nominations from States Parties and cooperation amongst groups of States Parties in the preparation of nominations.
- Assistance and Capacity Building for States Parties in the preparation of Tentative Lists
74. To implement the Global Strategy, cooperative efforts in capacity building and training for diverse groups of beneficiaries may be necessary to assist States Parties in acquiring and/or consolidating expertise in the preparation, updating and harmonization of their Tentative List and the preparation of nominations.
75. International Assistance may be requested by States Parties for the purpose of preparing, updating and harmonizing Tentative Lists (see Chapter VII). This can include use of the Upstream Process (see Paragraph 121).
76. The Advisory Bodies and the Secretariat will use the opportunity of evaluation missions to hold regional training workshops to assist under-represented States in the methods of preparation of their Tentative List and nominations.
- II.D Criteria for the assessment of Outstanding Universal Value**
77. The Committee considers a property as having Outstanding Universal Value (see paragraphs 49-53) if the property meets one or more of the following criteria. Nominated properties shall therefore:
- (i) represent a masterpiece of human creative genius;
  - (ii) exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;
  - (iii) bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;
  - (iv) be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;
  - (v) be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change;
  - (vi) be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance. (The Committee considers that this criterion should preferably be used in conjunction with other criteria);
- Decision 43 COM 11A
- Decision 43 COM 11A
- Decision 24 COM VI.2.3.5(ii)
- These criteria were formerly presented as two separate sets of criteria - criteria (i) - (vi) for cultural heritage and (i) - (iv) for natural heritage.
- The 6th extraordinary session of the World Heritage Committee decided to merge the ten criteria (Decision 6 EXT.COM 5.1)

- (vii) contain superlative natural phenomena or areas of exceptional natural beauty and aesthetic importance;
  - (viii) be outstanding examples representing major stages of earth's history, including the record of life, significant on-going geological processes in the development of landforms, or significant geomorphic or physiographic features;
  - (ix) be outstanding examples representing significant on-going ecological and biological processes in the evolution and development of terrestrial, fresh water, coastal and marine ecosystems and communities of plants and animals;
  - (x) contain the most important and significant natural habitats for in-situ conservation of biological diversity, including those containing threatened species of Outstanding Universal Value from the point of view of science or conservation.
78. To be deemed of Outstanding Universal Value, a property must also meet the conditions of integrity and/or authenticity and must have an adequate protection and management system to ensure its safeguarding.

## **II.E Authenticity and/or integrity**

### Authenticity

79. Properties nominated under criteria (i) to (vi) must meet the conditions of authenticity. Annex 4, which includes the Nara Document on Authenticity, provides a practical basis for examining the authenticity of such properties and is summarized below.
80. The ability to understand the value attributed to the heritage depends on the degree to which information sources about this value may be understood as credible or truthful. Knowledge and understanding of these sources of information, in relation to original and subsequent characteristics of the cultural heritage, and their meaning as accumulated over time, are the requisite bases for assessing all aspects of authenticity.
81. Judgments about value attributed to cultural heritage, as well as the credibility of related information sources, may differ from culture to culture, and even within the same culture. The respect due to all cultures requires that cultural heritage must be considered and judged primarily within the cultural contexts to which it belongs.
82. Depending on the type of cultural heritage, and its cultural context, properties may be understood to meet the conditions of authenticity if their cultural values (as recognized in the nomination criteria proposed) are truthfully and credibly expressed through a variety of attributes including:
- form and design;
  - materials and substance;
  - use and function;
  - traditions, techniques and management systems;
  - location and setting;
  - language, and other forms of intangible heritage;

Decision 39 COM 11

## Appendix 4

Blenheim Palace World Heritage Site Management Plan 2017

# BLENHEIM PALACE WORLD HERITAGE SITE REVISED MANAGEMENT PLAN 2017

APPENDIX III : SETTING STUDY

Appendix III - Setting Study



## 5 MANAGING SETTING AND ASSESSING IMPACTS

### SUMMARY OF VALUED FEATURES

5.01 Different parts of the setting have the potential to convey different aspects of OUV and the attributes of the WHS, which together are the main source of understanding the various significances of Blenheim and its setting. It is therefore helpful to re-iterate what these are. The elements of Blenheim's OUV are:

- Blenheim is an outstanding example of the work of John Vanbrugh and Nicholas Hawksmoor, two of England's most notable architects;
- Blenheim represents a unique architectural achievement celebrating the triumph of the English armies over the French;
- Blenheim and its associated Park has exerted great influence on the English Romantic movement which was characterised by the eclecticism of its inspiration, its return to national sources and its love of nature;
- The original landscape set out by John Vanbrugh who regulated the course of the River Glyme was later modified by Lancelot "Capability" Brown who created two lakes seen as one of the greatest examples of naturalistic landscape design;
- Blenheim Palace was built by the nation to honour one of its heroes John Churchill, the first Duke of Marlborough and is also closely associated with Sir Winston Churchill.

The attributes which help explain the OUV are:

- It remains the home of the same aristocratic family, the successive Dukes of Marlborough, for whom it was built;
- It still contains the unique early C18 architecture of the Palace and its associated assemblage of buildings together with an archive of original survey and building documentation;
- It is still set within the early C18 grand Vanbrugh landscape overlaid by Lancelot Brown's masterpiece of English Landscape style design, internationally considered to be the 'English Versailles';
- The surviving special relationship between the important architectural elements and their landscape setting are an exceptional piece of design and, together are greater than the sum of their parts;

- The UK has by far the greatest concentration of veteran trees in northern Europe and within High Park, which sits in the south-west section of Blenheim Park, is one of the finest areas of ancient oak-dominated woodland in the country. It is partially descended from the ancient Wychwood Forest, a C12 deer park and an Anglo-Saxon chase;
- The gardens and pleasure grounds which surround the Palace were partly designed by Lancelot Brown in the mid C18, and partly by the French landscape architect Achille Duchene at the start of the C20;
- The park retains a complete, C18 enclosing stone wall which protects its integrity, but views into and out of the site still provide key linkages between Blenheim and the traditional English countryside and villages surrounding it.

5.02 The elements of Blenheim's OUV (and the attributes which convey it) which the setting most directly relates to are:

- The connection with the River Glyme - the management of this river as it runs through the setting of the WHS directly affects the character, ecological value and water quality of Lancelot Brown's lakes within the WHS;
- The links with the much larger and ancient Wychwood Forest area;
- The value of the boundary wall and plantations which mainly hide the park from outside views, but also form important woodland elements in the wider landscape;
- The key visual linkages between Blenheim and its setting - to Bladon church in the south and from Old Woodstock to the Column of Victory in the east;
- The character of the setting as traditional English countryside, dotted with picturesque villages mainly built using a uniform palette of materials.

5.03 These significances are important individually and together in achieving a strong sense of place, which helps foster a sense of community through pride in the WHS and connecting it with the local area. Landscape character, views and the historic environment, together with recreational opportunities and biodiversity are all important parts of feeling connected and belonging within the local community.

## MANAGING THE SETTING

5.04 The importance of these elements of the setting of Blenheim in reinforcing the OUV and in maintaining and enhancing local distinctiveness and the high quality environment, can perhaps best be understood by considering the implications of not protecting them:

- The conversion of significant areas of agricultural land for other purposes, or the large-scale loss of woodland would detract from the distinctiveness of the setting;
- Tall developments on the skyline, or large-scale development (particularly those of a non-residential nature which tend to be bulkier and non-vernacular, for example industrial development; wind turbines; solar farms etc) could detrimentally influence the character of the adjoining rural areas;
- Increased levels of pollution and silt in the river catchments feed into the WHS and affect the highly significant Lancelot Brown lakes;
- Views from the Palace to the rooftops and church spire of Bladon could be lost, reduced or impacted on;
- The historic physical, and occasionally glimpsed visual, connection with Woodstock could be lost or reduced;
- Development that results in the joining of one village settlement to another could result in the settlements losing their distinctive nature.

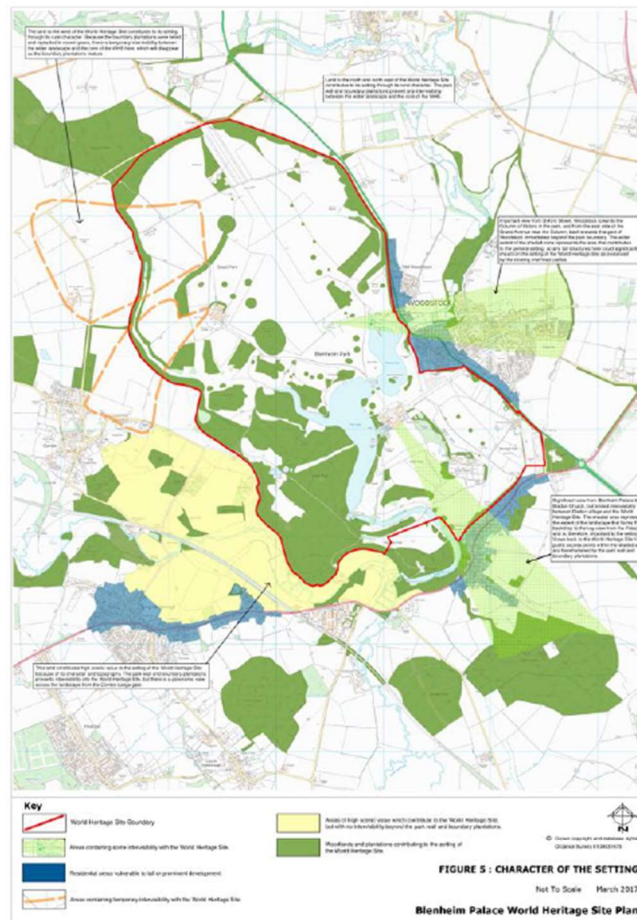
5.05 On-going management and care of the setting needs to be informed by this understanding of how the setting contributes to the significance and attributes of the site. In addition, it is clear that management of any WHS requires protection and enhancement of not only the site and its setting as a whole, but also of the individual heritage assets which contribute to OUV. This will include assets and attributes both within the site and within the setting.

5.06 Thus, as the NPPF makes clear, because the extent of setting is not fixed and may change as the asset and its surroundings evolve, it does not have a fixed boundary and cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. Because what comprises a heritage asset's setting may change as the asset and its surroundings evolve or as the asset becomes better understood or due to the varying

impacts of different proposals, management of these assets needs to be flexible and their values and relationships regularly reviewed. In addition, the setting of a heritage asset may reflect the character of the wider townscape or landscape in which it is situated, or be quite distinct from it. Extensive heritage assets, such as landscapes and townscapes, can include many heritage assets and their nested and overlapping settings, as well as having a setting of their own. A conservation area, for example, will include the settings of listed buildings and have its own setting, as will the village or urban area in which it is situated (explicitly recognised in green belt designations). All of these will have an influence on how setting is managed.

5.07 One of the key characteristics of the surroundings of Blenheim Park is that much of the setting lies within the wider extent of the Blenheim estate - which is effectively managed by a single owner. It has been owned by the Dukes of Marlborough for 300 years (one of the attributes which contribute to OUV), and has in recent years been recognised as an outstanding property of national heritage value. Thus for almost 300 years management of the wider estate has acted as a means of both supporting the historic core and protecting it. As a traditional landed estate, much of the land is retained in open agricultural and enclosed forestry use - another attribute which contributes to OUV. The grazed pastoral landscapes around the river valleys, along with the fields and woodlands are particularly significant as these reflect the land-use and character of the landscape that would have been appreciated during the 18th century. Contrasts between these features is muted and gentle, representing the historic character of the farmed landscape of middle England. The appropriate management and enhancement of these landscape features is therefore an important objective, and the areas which make a particular contribution to the setting of the WHS are highlighted on the accompanying map (Figure 5 from the WHS Management Plan). In terms of management, therefore, it would be helpful to encourage on-going management of the open elements of the landscape and river meadows through effective agricultural practices and appropriate grazing. The opportunities for other land management practices such as community woodlands, agri-environment schemes and community supported agriculture can also positively contribute to the appropriate care of the setting.





5.08 As the map shows, trees and woodlands are an important component of the character of the WHS and its setting whether individually, in groups or as part of a woodland or the parkland (both the boundary belts and the blocks within the park). There is a need to ensure a healthy on-going mixed age structure within wider landscape of gardens, streets and open spaces, along linear features and in woodlands. The management of the character of the immediate setting needs to recognise the desirability of providing softening and screening of buildings by trees and the contrast they provide to other more open areas. However, maintenance of key views are significant to the OUV, so there has to be a balance when managing the landscape and townscape to ensure these key views are maintained by careful control of new development and where opportunities occur to restore or enhance views. This demonstrates that the appropriate management of vegetation is important to support such an objective. The two main visual links - to Bladon church spire from the Palace; and back from Woodstock to the Column of Victory; are of particular significance and need to be protected in order to ensure that this attribute of OUV is conserved and, where possible, enhanced.

5.09 There are a number of existing or potential means available to ensure that Blenheim WHS and its setting are properly managed including:

- Policies to protect the WHS and its setting contained in the Local Plan and Core Strategy - which have the option of being supported by this document.
- Other policies on specific issues or for specific purposes which support appropriate management
- Management plans for other specific sites within the setting.
- The Blenheim WHS Management Plan.
- The Cotswolds Area of Outstanding Natural Beauty Management Plan
- The Green Infrastructure Strategy
- Other local strategies and guidance which may be a material consideration
- Liaison with landowners and organisations
- Projects to enhance, restore or protect the landscape character

## Appendix 5



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A Possible Roman Small Town at Sansom's Platt, Tackley, Oxon

Author(s): Helen Winton

Source: *Britannia*, 2001, Vol. 32 (2001), pp. 304-309

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only hints of buildings could be seen. The excavation evidence and finds from the vicinity of the cropmarks suggest occupation of the site between the first and fourth centuries A.D., but further investigations will be necessary to date the new cropmark evidence.

#### POSSIBLE ORIGINS AND CHARACTER

Although the site at Sansom's Platt is strategically placed close to the Rivers Glyme, Dorn and Cherwell and may have been established as one of a number of settlements at regular intervals along the Roman road,<sup>200</sup> there is as yet no evidence that its position or development is due to the influence of a military presence. It is just as likely that the economic advantages of its position, encouraging exploitation of trade routes along the rivers and the road between the Cotswolds and the Thames Valley, was a major factor in its establishment or development into a possible small town.

Booth has suggested that the foundation of the Roman settlement at Wilcote, which is situated 10 km to the west of Sansom's Platt, may have been influenced by its proximity to a settlement focus on the possible Iron Age oppidum defined by Grim's Ditch.<sup>201</sup> The small town at Sansom's Platt is situated close to Grim's Ditch but on present evidence it does not seem comparable to Wilcote as the centre of a concentration of settlements or villas and therefore is unlikely to have had pre-Roman origins.<sup>202</sup>

Perhaps the most noteworthy feature of the settlement at Sansom's Platt is the possible presence of the temple which, based on present evidence, contrasts with the situation at Wilcote and Asthall. There are at least five possible temple sites within a 13 km radius of Sansom's Platt,<sup>203</sup> but the evidence for these is varied and they may each have performed quite different functions, ranging from household shrine to rural temple. It is, therefore, impossible to say if the settlement at Sansom's Platt may owe some of its development to its position in a pattern of religious activity. The presence of a possible temple need not be seen as particularly significant because it may, as Booth suggests, simply represent a constituent part of a settlement rather than its focus.<sup>204</sup>

The form of the small towns along Akeman Street appears to differ and this could reflect a dissimilar development or function. Alchester, situated 12 km to the east, is of quite different character comprising as it does a much larger, strategically important, town based on a grid street plan.<sup>205</sup> It has also been suggested that the size and strategic position of Asthall mark it out as of greater importance in the region than the other smaller towns along Akeman Street.<sup>206</sup>

The possible town at Sansom's Platt can also be seen in the wider context of other settlements in the Cotswolds, in particular those recorded as cropmarks, for example at Wycomb, Kingscote, and Dorn.<sup>207</sup> However the variance in the form, setting, and development of these settlements suggests that the small towns in this region are characterised by their distinctiveness.<sup>208</sup> The lack of evidence for defences at the small town at Sansom's Platt need not be seen as unusual. Although many Roman small towns in Britain developed defences,<sup>209</sup> it is by no means unusual to have undefended sites and the presence of defences at the Roman town at Dorchester<sup>210</sup> distinguishes it from the 'undefended' small towns in the Cotswolds and along the route of Akeman Street.

It may be hoped that a systematic survey of the area from aerial photographs will enhance our knowledge of the development and nature of Roman settlement in the area around Sansom's Platt.

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*This paper is published with the aid of a grant from English Heritage*

<sup>200</sup> Hands 1993, figs 1–2.

<sup>201</sup> Booth 1998, 13–15, fig. 4.

<sup>202</sup> The distribution of Roman sites based on information from the NMR is fragmentary, and Scott (1993, 157–65) lists no great number of villas in the vicinity of Sansom's Platt.

<sup>203</sup> Based on information provided by the NMR.

<sup>204</sup> Booth 1998, 12.

<sup>205</sup> Burnham and Wachter 1990, 98–101.

<sup>206</sup> Booth 1997, 158.

<sup>207</sup> Timby 1998, 296–304, 347–51, figs 124 and 127.

<sup>208</sup> Timby 1998, 428–35.

<sup>209</sup> Burnham and Wachter 1990, 235–78.

<sup>210</sup> Timby 1998, 390–9, fig. 149; Corney and McOmish 1998, 393–6, fig. 150.

3.6.65A

# THE 'SMALL TOWNS' OF ROMAN BRITAIN

Barry C. Burnham and John Wacher

B.T. Batsford Ltd, London



subject to the limitations imposed by the quality of the archaeological evidence, but a general picture emerges even from that. Once established, for whatever reason, the small towns had to develop some economic or other factor to ensure their survival. Most of them, therefore, developed some sort of economic base in much the same way as their major counterparts. In reality, all settlements, regardless of their size, provided some level of manufacturing capacity not only for their own communities, but also frequently for the surrounding countryside. Small towns in turn were dependent upon larger towns both for administration and for those goods which they could not supply themselves, so that with time, a hierarchy of settlements would be built up, all to some extent interdependent upon each other and upon the rural areas they served. Excavations and surveys at the small towns have repeatedly shown that even the smallest had some servicing capacity, usually in the form of the characteristic shops and workshops fronting the main streets. Indeed almost all the chief manufacturing and service industries are represented in one form or another, such as the goldsmith at Norton, tanning at Alcester, the bakery at Springhead and the metal-working capacity at Wilderspool. It was for this reason that Rivet proposed dependence on trade as the key factor in defining towns,<sup>15</sup> but, as Fulford has recently demonstrated, the surviving archaeological evidence may not be adequate to quantify this fact independent of documentary sources.<sup>16</sup>

Occasionally, small towns display a concentration on particular industries; Water Newton and Mancetter for instance lay at the centres of huge potteries, while others were closely connected with large-scale extraction, including Charterhouse (Mendip lead), Weston-under-Penyard (Forest of Dean iron) and Droitwich (brine). At several small towns, a predominance of metal-working and associated industries apparently suggests a more specialized role, perhaps linked to the specific needs of the army, witness those sites on the fringes of the highland zone at Northwich, Middlewich, Wilderspool and Little Chester. Such apparently industrial specialization among the small towns can be matched in the sphere of religion as well, as several clearly developed around some sort of existing religious centre, such as the temple

complexes at Harlow and Frilford or the medicinal hot springs at Bath. This can sometimes be difficult to define, however, because temples and religious activity are generally well represented in all small towns.

Despite such enhanced economic and specialist roles, there is little doubt that most small towns were closely connected with agricultural production, even those with an apparent industrial bias, for even potters and smiths need to eat and drink and be clothed and shod. The evidence for contemporary field systems is a clear indicator of such activities. Many also acted as centres for groups of villas and peasant settlements, and it is possible that they provided a reservoir of agricultural labour, as well as their economic services, at special times in the agricultural year.

One further specialized function conferred upon small towns was that connected with provincial or local government. The *cursus publicus* signified by the existence at several sites of *mansiones* was one of the earliest; examples have been identified at Catterick, Wanborough and Wall. Provincial officials are also represented by inscriptions from Dorchester-on-Thames, Bath and Irchester. While certainty is impossible, the presence of such officials may help to explain the presence of some more sophisticated buildings in the small towns, as for example the massive masonry-built structure with good quality painted plaster just inside the north gate at Thorpe-by-Newark. Epigraphic evidence from several small towns might also be taken to indicate that they served within the framework of local government by acting as centres for the constituent *pagi* of the *civitates* or even as promoted *civitas* capitals in their own right, though what types of buildings are to be expected in consequence is still unknown in Britain.

Many of these official functions were imposed on their respective small towns, especially those along the major provincial roads. At a later date, in the later third, or more probably in the fourth, century, several existing sites were fortified as road stations or *burgi*, a class of sites well known in northern Gaul and Germany. One such sequence has been identified along Warling Street between Towcester and Wroxeter, but others suggest themselves, despite less consistent spacing, along the Fosse Way and Ermine Street. In addition, the two sites on the Lincolnshire Wolds fit logically into this late official sphere,

A HISTORY OF  
ROMAN  
BRITAIN

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Oxford New York  
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property and part in the city. Indeed, he might even prefer the provincial capital itself to his own local city, when public duties did not compel him to spend his time in the local courts and council-chamber.

The small town, therefore, is essentially dependent on the countryside, either because it houses people who work the land, or because it serves the daily needs of the estates and peasant farmers of the district, probably both. Even where there is industry on any scale, this is still true, since in Roman times industry was by and large located in the country, not the big cities. The distribution of villas, however, points to one other function that the country town may commonly have had. We have already noted the development of small towns on the main highways, particularly in connection with the Imperial Post, and have cited some examples of *mansiones*, as at Godmanchester. Various modern writers have pointed out an interesting phenomenon: that towns in Roman Britain, especially small towns, often have just one villa close to them, for example, Great Casterton. These have been named 'satellite villas', and may in some cases in fact have been *mansiones*. But if these satellites do have an official purpose, there may well have been various services that used them. One thinks of the *beneficiarius consularis* at Dorchester-on-Thames, for example, or the imperial freedman Naevius in the employ of the procurator's department, whose reused inscription was found near the villa at Combe Down just outside Bath. Where the occasional villa occurs just outside a city, as at Cirencester, one is tempted to think of more exalted officials, such as the *correctores*, who, as we have noted, are known to have been appointed in other provinces to supervise the running of local government on behalf of the emperor.

In the case of a major city such as Cirencester, one may expect sometimes to find the sort of luxurious villa (for example, Woodchester) further out, a place to which a prominent gentleman might ride out for the night after a day's work in public affairs, as Pliny liked to do from Rome to his place at Laurentum. In the fourth century, the period to which Woodchester and its like in Britain chiefly belong, Ausonius describes his country house as being not far from the city, yet not close to it either, so that he can exchange one for the other, as the fancy takes





Historic England

# Roman Settlements

Introductions to Heritage Assets





## 4 Associations

Most Roman-period settlement types are intimately associated with the rural landscape. While it is stating the obvious to say that farmsteads and (most) villas will have been integrated into the rural landscape, it is similarly true that towns could also be centres for farming.

Centuriation, the laying out of regular plots of newly conquered land by the state, has been dismissed in Britain by most authorities. However, it is clear that settlements and the routes that link them could have had significant impacts on the pre-existing landscape and presumably its inhabitants; for instance, while earlier routeways continued to function and develop, major new Roman roads often cut through pre-existing landscapes with apparently no regard to what was there before.

**Cemeteries** are regularly associated with settlements of all sizes, and in the case of towns are normally located on the approach roads in accordance with the Roman legal requirement that burials were made outside settlements; babies and neonates (new-born children) appear to have been exempted from this requirement and are often found buried within settlements. Cemeteries are known in association with smaller settlements, again often separated from

the occupation areas, although the overlaying of cemetery and occupation areas is also known, reflecting the expansion and decline of settlements. Burials, often scattered, are also often found in Roman-period field ditches.

Settlements of most types can be associated with, dependent on, or incorporate, shrines and temples, or industrial activity. Some settlements are associated with military sites (forts) throughout their history, others may produce evidence of military personnel without any evidence for distinctively military structures, perhaps reflecting troops on detached, possibly administrative, duties, while the presence of quantities of military equipment suggests the possibility of troops billeted in towns.

Some, apparently civilian sites, for example Dalton Parlours villa, West Yorkshire, may have military links – possibly as part of the military supply system, or perhaps reflecting military involvement in the trade in, or disposal of, excess materials. Civilian settlements may also be linked to industrial activity and transport functions, including sea and river borne trade, acting as sources and markets for goods, ports and in some cases transshipment points between water and land transport.

# ROMAN OXFORDSHIRE

Martin Henig and Paul Booth

with Tim Allen

SUTTON PUBLISHING

which terminated at the edge of the excavation in line with a known east-west street alignment, thus marking the position of a gateway in the eastern defences which would have lain just west of the site. Assuming that the 1961 wall was indeed the east wall of the town the enclosed area would have been about 5.5ha.

This elongated rectangular defended area was roughly bisected by a north-south axial road, likely to have been established well before the defences were built. Curiously, however, this road did not extend immediately south of a side street which ran mainly eastwards from its line just inside and parallel to the south defences. A possible southerly continuation of the axial road here, offset to the west from its main alignment, appears to have been put out of commission by the earthwork defences. A little further north was another side street, not quite parallel to the southerly one.

The early development of the civilian town is not well understood. Military activity could have continued as late as AD 90. While this is about the time that civilian building construction was underway at Alchester, the earliest certainly identified structure here, of timber, is no earlier than about the mid-second century.<sup>28</sup> The overall plan of this building and of timber structures probably of comparable date (though thought to be later by the excavator) at the Old Castle Inn remain unclear, however.

There is rather better evidence for later Roman buildings, the majority of which at least had stone foundations if not stone superstructures. Such buildings include a possible aisled structure of mid-third-century origin, on an anomalous north-west/south-east alignment situated in the north-west corner of the town. In the late Roman period this was partly demolished and its site occupied by about a dozen hearths or ovens, apparently used for lime burning.<sup>29</sup> A not dissimilar building lay east of the axial north-south street close to the centre of the town, while further south and west of the street was another building with corridor or aisled elements, of late fourth-century date and containing traces of a tessellated pavement in its south aisle. A little further south again a simple three-roomed building, with its long axis parallel to the street line, was also of very late Roman date.<sup>30</sup>

The existence of further probable stone buildings can be inferred from earlier records of tessellated floors. Examples of the latter, suggesting substantial town houses, are recorded just west of the High Street, at a point which might have lain just inside the eastern defences of the town, and in the south-west corner of the defended circuit. Another stone building is noted from beneath the abbey. Painted wall plaster, recorded in several locations, could also have derived from such buildings but might equally have come from timber structures, as seems to have been the case at the Old Castle Inn, for example.

There is relatively little evidence for economic functions in the town, but the close connections between even settlements at the upper end of the regional hierarchy and the surrounding countryside is indicated by the presence of agricultural implements in two late Roman ironwork hoards from within the town.<sup>31</sup> The significance of the possible lime-burning kilns from the Beech House site is unclear – the development of this site in the late Roman period is seen as 'industrial', and certainly the number of kilns or ovens suggests fairly intensive activity, thought by the excavators to be possibly producing material for agricultural use, but there is no direct evidence for the nature