



**SUMMARY OF WRITTEN REPRESENTATIONS  
ON BEHALF 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**

## **Introduction**

- 1.1 This document is a Summary of the Written Representations made by Historic England for Deadline 2 of the Examination into the Application for a Development Consent Order (DCO) by Solar Five Ltd, authorising development to construct the Botley West Solar Farm.
- 1.2 Historic England is more formally known as the Historic Buildings and Monuments Commission for England. We are the government's statutory adviser on all matters relating to the historic environment, including world heritage. It is our duty under the provisions of the National Heritage Act 1983 (as amended) to secure the preservation and enhancement of the historic environment. There is also, in this case, the requirement in Article 4 of the 1972 'Convention Concerning the Protection of the World Cultural and Natural Heritage' to protect, conserve, present and transmit the values of the Blenheim World Heritage Site (WHS).
- 1.3 As stated in our Section 56 Relevant Representations (February 2025), and restated in our Written Representations, we support the provision of renewable energy. Historic England has worked closely and constructively with the applicants to review iterations of the Heritage Impact Assessment (HIA), ensure the impacts are fully understood and seek solutions that avoid or minimise harm. We have recommended additional work which 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.
- 1.4 However, in its current form, the scheme's central and northern sections do raise concerns relating to the historic environment. These include potential impacts on a World Heritage Site, scheduled monument, highly-graded listed buildings and a registered park and garden.

## **Focus of Historic England's Advice**

- 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);
  - the Roman Villa scheduled monument (NHLE 1006346);
  - grade I listed Churches of St Peter and St Paul, Church Hanborough (NHLE 1052991) and St Peter's, Cassington NHLE 1367949); and
  - grade II\* listed Church of St Michael, Begbroke (NHLE 1291232).

- 1.6 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, including the County archaeologist.
- 1.7 Our written representations focus on ensuring that:
- a. the significance of any heritage asset 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. proposals to avoid, or mitigate impacts on heritage significance have been considered and can be secured with appropriate DCO terms; and
  - d. the Examining Authority is 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.
- 1.8 Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of the proposed development, recognising that the more significant the asset and the greater the weight that should be given to its conservation (NPS EN-1 5.9.27).

### **Historic environment issues addressed in the written representations**

- 1.9 While Historic England does not object to the principle of the Scheme, we do consider the proposals, in their present form, would harm designated heritage assets of the highest significance.
- 1.10 Outstanding matters (covered in detail in the written representations) are summarised below.
- a) Blenheim Palace World Heritage Site, Blenheim Palace and RPG
- 1.11 The development would result in some harm to the OUV and significance of the Blenheim Palace World Heritage Site, Blenheim Palace and RPG. ICOMOS in their Technical Review report from March 2024 similarly highlighted the Scheme would likely have an adverse impact on the property's OUV.
- 1.12 This harm to Blenheim WHS would be a significant effect in EIA terms 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 and at a modest level.

1.13 We consider that the harm to the Blenheim WHS, palace and RPG could be avoided through targeted changes to the scheme, by removing the solar panels from the fields immediately to the south of Bladon. In our assessment, the fields within the application site, which contribute to the setting and OUV of the WHS are 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).

b) Roman Villa Scheduled Monument

1.14 Based on the information available, and in the absence of the results of the trial trenching, the Roman Villa scheduled monument would be harmed through change in its setting. We consider that the Scheme's impact on the setting of the monument would be greater than the negligible concluded by the applicant. We recommend the applicant revisits these conclusions to ensure the impacts are identified at the appropriate level.

c) Churches of St Peter and Paul in Church Hanborough, St Peter's in Cassington and St Michael's in Begbroke

1.15 Similarly, we disagree that the impact on the setting to the grade I churches of St Peter and Paul in Church Hanborough and St Peter's in Cassington and grade II\* listed church of St Michael's in Begbroke would be negligible. In our view it would be low adverse in EIA terms. In NPS terms this would amount to modest harm to the significance of the heritage asset from development within its setting. We would recommend the applicant revisits these conclusions to ensure the impacts are identified at the appropriate level.

**Gaps in, and sufficiency of, the information submitted as part of the DCO application:**

1.16 In our view further information is required to demonstrate that the historic environment has been adequately assessed and considered in the development of this DCO application.

- a) The *Heritage Impact Assessment (HIA)* currently does not refer to or address the ICOMOS Technical Reviews. In its report, 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 it assessed in the character of the surrounding landscape.
- b) The HIA has yet to provide sufficient information to evidence and justify the conclusions drawn. The HIA identifies that the development would negatively impact an attribute of OUV (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. As a result it is not clear how the impacts to this attribute to OUV have been minimised, and why they couldn't be avoided.

- c) Similarly, there is need for a more structured assessment of the types of potential impacts and the elements of the proposed scheme, 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).
- d) Additional visualisations and information (e.g. Lighting Strategy) is needed to show the Scheme (as set out in the first draft DCO) and its impacts (both positive and negative) on aspects of the historic environment. These must show the reasonable worst-case scenario within the Order Limits and should include static and kinetic, as well as day and night-time, visualisations. The visualisations should include all aspect of the development to fully reflect the impact this would have. This includes all associated infrastructure (fences, security camera columns, lighting, compounds etc).
- e) The conclusions drawn around the magnitude of impact (Settings Assessment (EN010147/APP/6.5) in relation to the highly designated heritage assets appear to have been downplayed in our view and we recommend the applicant reconsiders or provides further clarity over these conclusions.
- f) The results of the trial trenching around the scheduled monument at Sansom's Platt remain outstanding, so it is not possible to be sure of the true extent of the settlement.

### **Other Matters**

- 1.17 We recommend in future visits to the Site, the ExA walks the Public Rights of Ways through the agricultural fields (part of the application site) to the south and southwest of Bladon. We recommend the ExA observes 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. In the northern section of the application site, we recommend the ExA visit the scheduled monument of Sansom's Platt to assess the impact upon it through the proposed change of setting.
- 1.18 We recommend consideration is given to including a provision within Schedule 16 of the DCO for the Local Planning Authority to consult with third parties.

- 1.19 We recommend further clarity is provided over Schedule 2 in relation to Archaeology (10) and the locations of those intrusive archaeological surveys are defined. We would be grateful if this could be clarified.

### **Conclusion**

- 1.20 As outlined in our earlier Relevant Representations, Historic England recognises the importance of expanding the provision of renewable energy and considers the Scheme (as presently articulated in the draft DCO) would contribute to the sustainability of the World Heritage Site.
- 1.21 However, we advise that the identified harm to the most highly graded heritage assets, namely to the WHS, could be reduced in accordance with paragraph 5.9.24 of the Overarching National Policy Statement (NPS) for Energy (EN-1).
- 1.22 It is also essential that all relevant evidence is made available so we can advise the ExA of our views to enable an informed decision to be made on any impacts to the historic environment.
- 1.23 Our Written Representations highlight the information and refinements that we advise remain necessary at this stage to determine the Application for the first draft DCO. We 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 these outstanding matters during the course of the Examination.
- 1.24 Historic England will also 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.