

Botley West Solar Farm

STATEMENT OF COMMON GROUND -

Historic England

EN01047/APP/11.7/4

04 June 2025

NPI-12426 Statement of Common Ground - Historic England v1 04 06 2025





Approval for issue

Jon Alsop 4 June 2025

The report has been prepared for the exclusive use and benefit of our client and solely for the purpose for which it is provided. Unless otherwise agreed in writing by R P S Group Limited, any of its subsidiaries, or a related entity (collectively 'RPS') no part of this report should be reproduced, distributed or communicated to any third party. RPS does not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report.

The report has been prepared using the information provided to RPS by its client, or others on behalf of its client. To the fullest extent permitted by law, RPS shall not be liable for any loss or damage suffered by the client arising from fraud, misrepresentation, withholding of information material relevant to the report or required by RPS, or other default relating to such information, whether on the client's part or that of the other information sources, unless such fraud, misrepresentation, withholding or such other default is evident to RPS without further enquiry. It is expressly stated that no independent verification of any documents or information supplied by the client or others on behalf of the client has been made. The report shall be used for general information only.

Prepared by:

RPS 101 Park Drive, Milton Park, Abingdon, Oxfordshire, OX14 4RY United Kingdom **Prepared for:**

Photovolt Development Partners GmbH, on behalf of SolarFive Ltd.





Contents

SIGN	IATUR	'ES	IV
1	INTR	ODUCTION	5
	1.1	DCO Reference	
	1.2	Date of Examination	5
	1.3	Proposed Development	5
	1.4	Statement Overview	5
	1.5	Historic England	6
2	RELE	EVANT SUBMISSIONS DOCUMENTS AND PLANS	6
3	REC	ORD OF RELEVANT CORRESPONDENCE	7
4		TERS THAT ARE AGREED	
5	MAT	TERS YET TO BE AGREED	9
6	MAT	TERS THAT ARE NOT AGREED	12
Table	es		
Table	2.1:	Draft DCO submission documents and plans record pursuant to Historic England	
		discussions – Historic Environment	6
Table	e 4.1:	Record of Matters of Specific Agreement to Date – Historic Environment	8
Table	5.1:	Record of Matters Yet to be Agreed to Date – Historic Environment	
Table	e 6.1:	Record of Matters that are Not Agreed – Historic Environment	12

Appendices

Appendix A Record of Relevant Correspondence





SIGNATURES

This Statement of Common Ground has been prepared and agreed by SolarFive Ltd and Historic England.

HISTORIC ENGLAND

[Signature]

[Name]

[Title]

[Organisation]

[Date]

PDVP on behalf of SolarFive

[Signature]

[Name]

[Title]

[Organisation]

[Date]

1 Introduction

1.1 DCO Reference

1.1.1 EN010147/APP/11.7/4

1.2 Date of Examination

1.2.1 May 2025 - November 2025

1.3 Proposed Development

- 1.3.1 The Applicant is seeking development consent for Botley West Solar Farm (the 'Project'), which in summary will comprise the construction, operation, maintenance and decommissioning of a photovoltaic ('PV') solar farm and associated infrastructure with a total capacity exceeding 50 megawatts ('MW'), in parts of west Oxfordshire, Cherwell and Vale of White Horse districts. The Project will export electricity for connection to the National Grid at Botley West.
- 1.3.2 The Project is classed as a 'nationally significant infrastructure project' ('NSIP') for the purposes of the Planning Act 2008 (PA 2008) and requires an application for a DCO. The application for development consent is being submitted to the planning inspectorate ('PINS'), with the decision on whether to grant a DCO to be made by the Secretary of State for Energy Security and Net Zero (the 'Secretary of State'), as required under the PA 2008.
- 1.3.3 This Statement of Common Ground (SoCG) has been prepared to support the DCO application made to the Secretary of State under section 37 of the PA 2008 for the proposed Project. The Application has been submitted by SolarFive Ltd (the Applicant).
- 1.3.4 A Location Plan can be found in the Examination Library at [AS-024] and a full description of the Project can be found at ES Chapter 6 Project Description [APP-043].

1.4 Statement Overview

- 1.4.1 This Statement of Common Ground ('SoCG') is a working draft document. It comprises a record of consultation held with the relevant SoCG organisation to date as appropriate, and is designed to evolve and represent the ongoing nature of these discussions throughout the Examination period.
- 1.4.2 An overarching Statement of Commonality **[EN010147/APP/11.6]** has been submitted alongside this document and should be referred to in conjunction with this SoCG.
- 1.4.3 For the avoidance of doubt, this SoCG comprises contributions from the following environmental topic disciplines:
 - Historic Environment
- 1.4.4 This statement addresses the following areas of common ground in relation to the Applicant Project Team's engagement with Historic England to date:

- a. Relevant submission documents and plans
- b. Record of relevant correspondence to date
- c. Matters that are agreed
- d. Matters yet to be agreed
- e. Matters that are not agreed

1.5 Historic England

1.5.1 [Historic England to insert text setting out their status and remit]

2 Relevant Submissions Documents and Plans

2.1.1 A list of DCO documents and plans of relevance to engagement with Historic England is identified in the table below for ease of reference.

Table 2.1: Draft DCO submission documents and plans record pursuant to Historic England discussions – Historic Environment

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.2	ES Non-Technical Summary	APP-037	November 2024
EN010147/APP/6.3	ES Volume 1, Chapter 7: Historic Environment	CR1-003	Rev 1/March 2025
EN010147/APP/6.5	ES Volume 3, Appendix 7.1: Historic environment desk-based assessment	APP-131	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.2: Assessment of airborne remote sensing and satellite imagery for archaeology	APP-132	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.3: Geophysical survey report, Parts 1-8	APP-133 – APP- 140	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment	APP-141	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.5: Settings Assessment	APP-142	November 2024
EN010147/APP/6.5	ES Figures 2.1a – 2.4c – Illustrative Masterplan	AS-020	Rev 1/March 2025
EN010147/APP/6.5	ES Figures 8.248 - 8.371 - Photomontages (Winter and Summer)	APP-072 – APP-080	November 2024

3 Record of Relevant Correspondence

- 3.1.1 The Project has been the subject of pre-application engagement with Historic England and both parties continue to engage throughout and beyond the submission of the DCO application for the Project.
- 3.1.2 **Appendix A** identifies the discussions and correspondence that have taken place between the Applicant's project team and Historic England to date.



4 Matters That Are Agreed

Table 4.1: Record of Matters of Specific Agreement to Date – Historic Environment

Date	Matter	Comment	Outcome
none	none	none	none



5 Matters Yet to be Agreed

Table 5.1: Record of Matters Yet to be Agreed to Date – Historic Environment

Date	Matter	Comment	Outcome
Up to DL1	The scope of ES Volume 1, Chapter 7: Historic environment [CR1-003] has been developed with reference to comments received following submission of the Scoping Report and the PEIR, and is acceptable.		Under discussion
Up to DL1	The suite of technical guidance adhered to is acceptable.		Under discussion
Up to DL1	The desk-based methodology for the establishment of the historic environment baseline is acceptable.		Under discussion
Up to DL1	The application of the geophysical surveys within the Project Site is acceptable.		Under discussion
Up to DL1	The identification of designated heritage assets within the defined study area is acceptable.		Under discussion
Up to DL1	The methodology used for the assessment of likely impacts and effects is acceptable.		Under discussion
Up to DL1	The methodology used for the Cumulative Effects Assessment is acceptable.		Under discussion
Up to DL1	The classification of the likely magnitude of impacts on designated heritage assets is acceptable, other than in respect of the specific assets identified in Table 6.1 of this Statement of Common Ground.		Under discussion
Up to DL1	All harm to the significance of designated heritage assets is less than substantial.		Under discussion
Up to DL1	As such, the test set out in paragraph 5.9.32 of NPS-EN1 is the relevant test.		Under discussion
Up to DL1	CDC/VWHDC/WODC should be the Relevant Authorities for the discharging of Requirements, as set out in the Draft DCO.		Under discussion
Up to DL1	The potential visibility of the Project Site from locations within the Blenheim Palace World Heritage Site.	The Applicant's position is that no part of the Project would be visible from any location within the Blenheim Palace World Heritage Site.	Under discussion

Date	Matter	Comment	Outcome
		Additional viewpoints have been agreed with Historic England to confirm this position. These are being discussed with Historic England and a further update will be provided in due course.	
Up to DL1	The likely magnitude of impact (of the Project) on the significance of the Grade I Registered Park and Garden at Blenheim Palace	The Applicant has assessed the likely magnitude of impact as negligible adverse, leading to a long-term, reversible minor adverse effect. Historic England consider that the likely magnitude of impact is greater than negligible, with the consequent harm to the significance of the Registered Park and Garden being less than substantial and 'modest in degree'.	Under discussion
Up to DL1	The likely magnitude of impact (of the Project) on the significance of the Scheduled Monument at Sansom's Platt.	The Applicant has assessed the likely magnitude of impact as negligible adverse, leading to a long-term, reversible minor adverse effect. Historic England consider that the likely magnitude of impact is greater than negligible.	Under discussion
Up to DL1	The likely magnitude of impact (of the Project) on the significance of the Grade I listed Church of St Peter and St Paul at Church Hanborough.	The Applicant has assessed the likely magnitude of impact as negligible adverse, leading to a long-term, reversible minor adverse effect. Historic England consider that the likely magnitude of impact is greater than negligible, with the consequent harm to the significance of the Grade I listed church being less than substantial and 'modest in degree'.	Under discussion
Up to DL1	The likely magnitude of impact (of the Project) on the significance of the Grade I listed Church of St Peter at Cassington.	The Applicant has assessed the likely magnitude of impact as negligible adverse, leading to a long-term, reversible minor adverse effect. Historic England consider that the likely magnitude of impact is greater than negligible, with the consequent harm to the	Under discussion

Date	Matter	Comment	Outcome
		significance of the Grade I listed church being less than substantial and 'modest in degree'.	
Up to DL1	The likely magnitude of impact (of the Project) on the significance of the Grade II* listed Church of St Michael at Begbroke.	The Applicant has assessed the likely magnitude of impact as negligible adverse, leading to a long-term, reversible minor adverse effect. Historic England consider that the likely magnitude of impact is greater than negligible, with the consequent harm to the significance of the Grade II* listed church being less than substantial and 'modest in degree'.	



6 Matters That Are Not Agreed

Table 6.1: Record of Matters that are Not Agreed – Historic Environment

Date	Matter	Comment	Outcome
None	None	None	None



Appendix A Record of Relevant Correspondence

Date	Торіс	Outcome	Status
Historic	Environment		
15/12/22	Given the number of important designated heritage assets within the area, early discussions would be helpful in order to agree the key sites and setting issues which will need to be considered.	Key sites and settings were identified via the Scoping process.	Under Discussion
15/12/22	Ensure consultation with the relevant local authority Conservation teams and with the archaeological staff at Oxfordshire County.	The district councils have been consulted at various stages throughout the development of the Project, including statutory and non-statutory consultations. The Applicant has responded to any comments made by the district councils (Cherwell SoCG [EN010147/APP/11.7/1]; Vale of White Horse SOCG [EN010147/APP/11.7/12] and West Oxfordshire SoCG [EN010147/APP/11.7/13]). The archaeological staff at Oxfordshire County Council have been closely involved in the design and implementation of the programmes of archaeological fieldwork. Further details of this involvement are set out in the SoCG with OCC [EN010147/APP/11.7/10].	Under Discussion
15/12/22	Assessment and evaluation of the historic	The design of the Project	Under Discussion
.01122	environment should be carried out as early as possible so that the information can feed	responds to the location and nature of heritage assets. This is evidenced in regard to numerous	Citaci Discussion
15/12/22	The detailed assessment work should contain an examination of the potential impacts upon all heritage assets likely to be affected, including designated heritage assets and their settings together with	The assessment of impacts and effects presented in Section 7.9 of ES Chapter 7: Historic environment [CR1-003] includes assessment of effects in respect	Under Discussion

Date	Topic	Outcome	Status
	potential impacts on non-designated assets including below-ground archaeology.	on non-designated heritage assets including below-ground archaeology.	
15/12/22	It is particularly important to assess any potential impacts to the WHS at an early stage, taking a proportionate approach.	A detailed assessment of the potential impacts of the Project resulting from changes within the setting of the Blenheim Palace WHS is presented in ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment [APP-141].	Under Discussion
24/07/23	The 2022 UNESCO guidance document Guidance and Toolkit for Impact Assessment in a World Heritage Context sets out the relevant methodology for the assessment of likely impacts on the Blenheim Palace WHS.	A detailed assessment of the potential impacts of the Project resulting from changes within the setting of the Blenheim Palace WHS is presented in ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment [APP-141]. This assessment has been undertaken in accordance with the 2022 UNESCO guidance document Guidance and Toolkit for Impact Assessment in a World Heritage Context.	
24/07/23	The ES should also consider the potential impacts on non-designated features.	The assessment of impacts and effects presented in Section 7.9 of ES Chapter 7: Historic environment [CR1-003] includes assessment of effects in respect on non-designated heritage assets.	Under Discussion
24/07/23	Assessment and evaluation of the historic environment should be carried out at as early a stage as possible so that the resulting information can feed into the design.	The design of the Project responds to the location and nature of heritage assets. This is evidenced in regard to numerous heritage assets, including the Blenheim Palace WHS, Scheduled Monument, listed buildings, Conservation Areas and buried archaeological remains.	Under Discussion
24/07/23	For below-ground archaeological remains, the assessment process should include trial trenching.	A programme of trial trenching has been undertaken within much of the Order Limits, with a total of 885 trenches being excavated and recorded.	Under Discussion

Date	Topic	Outcome	Status
24/07/23	The Applicant should seek the involvement of the Conservation Officers at the relevant district councils and the archaeological staff at Oxfordshire County Council.	consulted at various stages	
24/07/23	The assessment should clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.		Under Discussion
24/07/23	Photomontages should be used as part of the assessment process.	The assessment of effects resulting from change within the setting of heritage assets has been undertaken with reference to the accurate representative visualisations presented in ES Volume 2, Figures 8.248 to 8.371 [APP-072 – APP-080]. Additional viewpoints have been agreed with Historic England to confirm this position. These are being discussed with Historic England and a further update will be provided in due course.	Under Discussion
24/07/23	A glint and glare assessment should take place if there is any possibility that glint and glare from the solar array could be visible within sensitive historic views.	A glint and glare assessment has	Under Discussion

Date	Topic	Outcome	Status
		potential impacts arising from glint and glare within sensitive historic views were identified.	
24/07/23	The assessment should take account of potential impacts upon perceptions, understanding and appreciation of the heritage assets in the area.	The assessment of likely impacts and effects presented in Section 7.9 of ES Chapter 7: Historic environment [CR1-003] takes account of the understanding and appreciation of the heritage assets.	
24/07/23	The assessment should consider the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.	decommissioning of the Project would not result in any changes	Under Discussion
24/07/23	The EIA should be internally coherent - the cultural heritage chapter should not be a stand-alone exercise but should refer to anomake use of the findings of the landscape and visual assessment. Significant heritage assets should be considered in the LVIA as sensitive receptors.	and effects presented in Section 17.9 of ES Chapter 7: Historic environment [CR1-003] takes account of the landscape and	Under Discussion
24/07/23	It should not be assumed that magnetometry will be the best geophysics technique for all areas - other techniques may need to be considered.	The methodology for the geophysical survey was discussed and agreed with the archaeological advisor to the local planning authorities. The trial trenching found that the geophysical survey was very reliable in respect of the identification of buried archaeological sites and features	Under Discussion
24/07/23	If land for environmental mitigation is to include new planting this is potentially damaging to archaeological remains and the land may therefore require geophysical survey.	The geophysical survey has covered all areas of the Project Site that are suitable for this type of survey, including land proposed for new planting.	Under Discussion

Date	Topic	Outcome	Status
24/07/23	It does not seem possible to entirely dismiss the possibility of damage to archaeological deposits during decommissioning, especially at a distance of 40 years into the future.	damage to buried archaeological remains during decommissioning	Under Discussion
24/07/23	Although views and visibility are an important element of setting, HE guidance is clear that our experience is also influenced by 'our understanding of the historic relationship between places.'	The assessments presented in ES Volume 3, Appendix 7.4: Blenheim Palace WHS – Heritage Impact Assessment [APP-141] and ES Volume 3, Appendix 7.5: Settings Assessment ES [APP-142] take account of this point.	Under Discussion
26/07/23	Presentation to Historic England.	The Applicant provided an update on the proposed timeline for the Project and a review of relevant activities undertaken since the preparation of the Scoping Report. This included a preview of some of the results of the work later presented as ES Volume 3, Appendix 7.2: Assessment of airborne remote sensing and satellite imagery for archaeology [APP-132].	Under Discussion
30/01/24	Discussion regarding Historic England's initial response to the Preliminary Heritage Impact Assessment for the Blenheim Palace World Heritage Site (as set out within the PEIR).	The points raised within the discussion have been considered, Where appropriate, these have been responded to within the assessment presented as ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment [APP-141].	Under Discussion
07/02/24	The Non-technical Summary (NTS) concludes that 'No significant effects in respect of any aspect of the historic environment have been identified within the PEIR.' This is not supported by the contents of the PEIR. Chapter 7 on heritage assesses that impacts on designated heritage assets may up to moderate adverse, which is significant (these impacts would be from change to the setting of the assets – the PEIR seems confident that the impacts can be reduced but this is premature when detailed assessment has not been carried out).	Appendix 7.5: Settings Assessment [APP-142]. No significant adverse effects have	Under Discussion

Date	Topic	Outcome	Status
07/02/24	Impacts on archaeological remains are assessed as low, leading to minor adverse effect (not significant). This may need to be revised when the archaeological trench evaluation work has been carried out. Also, some cable trenches are in road verges where evaluation is not possible and opportunity for mitigation by design will be very limited. A greater effect could therefore also occur in that situation.	sufficiently buffered within the Project design as shown on the Illustrative Masterplan presented as ES Figures 2.1a – 2.4c [AS- 020].The mitigation measures established for the avoidance	Under Discussion
07/02/24	(e.g. for all of their remaining lifetime). In discussions of setting of heritage assets, experience is a key factor and there are a range of experiences to be considered. The predicted life span of the project may	decommissioning. UK	Under Discussion

Date	Торіс	Outcome	Status
		'medium-term', 'long-term' and 'permanent' to describe the duration of impacts, and not the term 'temporary'. The assessment can only cover the likely impacts and effects of the Project as set out in ES Volume 1, Chapter 6: Project Description [APP-043]. The likely impacts and effects of any time extension or successor development would need to be assessed as part of the planning process at that time.	
07/02/24	Throughout the PEIR many impacts are described as fully reversible. Taking a cautious approach, we would note that such changes as planting to screen the solar plant are potentially reversible but in practice this is unlikely to happen after over forty years of growth.	World Heritage Site – Heritage Impact Assessment [APP-141].	Under Discussion
07/02/24	There is very limited discussion in the PEIR (and the HIA) of predicted positive impacts on heritage assets, or of benefits that could accrue from the scheme which would provide community benefit or directly benefit the WHS.	buried archaeological remains are set out in Section 7.9 of ES Volume 1, Chapter 7 Historic	Under Discussion
07/02/24	Impacts on the Blenheim Palace WHS This is covered in a preliminary Heritage Impact Assessment (HIA) which is included within the PEIR as Appendix 7.4. The HIA is recommended in the Guidance and Toolkit for World Heritage Assessments in a World Heritage Context (UNESCO 2022). We welcome the use of this toolkit, and the use of the Blenheim Palace World Heritage Site Revised Management Plan 2017, Historic Landscape Management Ltd 2017 (WHSMP).	SVolume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment [APP-141].	Under Discussion

Date	Topic	Outcome	Status
	We also welcome the commitment to an iterative approach and ongoing engagemen with Historic England.	t	
07/02/24	Historic England has emphasised that impacts on the OUV of the WHS must be approached in a manner appropriate to this highest form of heritage designation. Great emphasis must be placed on avoiding (preferably) or minimising impacts through design or site selection (for example) rather than relying on mitigation. We remain concerned that throughout the HIA, impacts on the WHS are described as 'minor adverse', 'not significant' or 'acceptable'.	Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment [APP-141]. This sets out how the design of the Project has sought to avoid	Under Discussion
07/02/24	The question of considering alternative sites is also relevant here. The HIA does not currently include the detail on how the current site configuration has been arrived at.	This point has been addressed within the assessment presented as ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment [APP-141].	Under Discussion
07/02/24	The attributes of the Overall Universal Value (OUV) of the WHS and the elements that support those attributes have not always been given sufficient weight or have not been sufficiently assessed both in themselves, and in terms of the predicted impact on them.	This point has been addressed within the assessment presented as ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment [APP-141].	Under Discussion
07/02/24	The scheme is entirely located outside of the WHS and its enclosing stone wall, meaning that the most important attributes, values and impacts to be considered are those concerning how the wider setting of the WHS contributes to its OUV. The Impact Identification Table of the HIA sets out attributes and predicted impacts on them. We advise that the table needs considerable revision.	These points have been addressed within the assessment presented as ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage tImpact Assessment [APP-141].	Under Discussion
07/02/24	The WHSMP mentions solar farms under 'Managing the setting' notes on page 44. We advise that this impact has been given insufficient weight in the HIA, by not taking adequate account of attributes and also because the rural nature of the setting of the WHS has a particular historic value. In this context it is important that change to setting is considered in the widest sense, without over-reliance on consideration of intervisibility - we consider this to be a weakness of the HIA current draft.	These points have been addressed within the assessment presented as ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment [APP-141].	Under Discussion

Date	Торіс	Outcome	Status
07/02/24	The wider setting of the park, part of the Blenheim Estate, has traditionally supported and protected what is now the WHS. Change to the setting has the potential to have a negative impact on the understanding of this close historic relationship if the rural character is eroded. This point needs to be considered in relation to the impact on the historic landscape character in the HIA (and PEIR) where the value of the historic landscapes may be higher than the current assessment of 'Generally low'. Enclosure landscapes, which are a large proportion of the areas considered, were enclosed due to the influence of the Dukes of Marlborough and they therefore have value in relation to the WHS which is higher than their intrinsic value.	presented as ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment [APP-141] and within the assessment set out in Section 7.9 of ES Volume 1, Chapter 7: Historic environment [CR1-003].	Under Discussion
07/02/24	With regard to views, the HIA has assessed the impact on the WHS from two sites: the Column of Victory and Blenheim Palace; these are tightly defined. The WHS boundary is obviously far larger than that. Page eight states that 'Indeed, no part of the Site is visible from any location within the WHS'. The HIA will need to set out what other viewpoints have been assessed to support this statement.	addressed within the assessment presented as ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment [APP-141].	Under discussion
07/02/24	We advised previously that the LVIA and HIA would need to be closely connected. The assertions in the HIA regarding potential visibility of the proposed development are presented, currently, without the detailed supporting evidence from the LVIA.	These points have been addressed within the assessment presented as ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment [APP-141]. Additional viewpoints have been agreed with Historic England to confirm this position. These are being discussed with Historic England and a further update will be provided in due course.	Under discussion
07/02/24	Positive impacts and benefits, including heritage benefits, have already been mentioned above as being inadequately covered. This point applies particularly to the WHS, where communal value is part of the OUV and community benefit is therefore clearly desirable.		Under Discussion

Date	Topic	Outcome	Status
07/02/24	Heritage assets outside of the World Heritage Site	The detailed assessment of impacts and effects arising from changes within the settings of	Under Discussion
	Individual designated heritage assets both inside and outside of the WHS have not yet been assessed so our comments are limited at this time.	designated heritage assets is presented in ES Volume 3,	
07/00/04	Assert of the title of the control of the control of the	The late the leaves of the	The Lee Proceeding
07/02/24	As part of that further examination of the setting of designated heritage assets, as highlighted above, there should be a close connection with the LVIA in order to provide the evidence base for the conclusions that are drawn. We are pleased to hear that photomontage visualisations will be prepared, and we recommend that the precise locations of these are reviewed so that any visual impacts on the historic environment can be fully assessed. These photomontages should illustrate not only the	presented in ES Volume 3, Appendix 7.5: Settings assessment [APP-142].The assessment included review of visualisations prepared for the VIA and presented in ES Volume 2, Figures 8.248 - 8.371 [APP-	Under discussion
	solar panels themselves, but also any associated infrastructure proposed (e.g. fencing, lighting, CCTV towers and battery storage) so the full visual impact of the proposal can be understood.	Additional viewpoints have been agreed with Historic England to confirm this position. These are being discussed with Historic England and a further update will be provided in due course.	
07/02/24	For non-designated heritage assets, we welcome the approach taken thus far which has included extensive consultation with the Oxfordshire County Archaeology Team and desk-based assessment followed by geophysical survey. The research done so far has already found below-ground archaeological remains which may well be of equivalent (national) importance to designated sites, including a possible Roman temple. The approach taken to such remains, of avoiding direct impacts and assessing the impact of change to their setting, is welcome. However, predicting that the magnitude of impact will be negligible seems premature.	remains have been avoided and sufficiently buffered within the Project design as shown on the Illustrative Masterplan presented as ES Figures 2.1a – 2.4c [AS-020].The mitigation measures	Under Discussion
07/02/24	We note that the results of the evaluation trenching will be incorporated into the Environmental Statement (ES) and this will	A programme of trial trenching has been undertaken within much of the Order Limits, with a	Under Discussion

Date Topic Outcome Status

be valuable, as is the intention to use these total of 885 trenches being results in adjusting the design of the excavated and recorded. T scheme to reduce or remove impacts.

excavated and recorded. The reports on the results of this work will be submitted into the Examination at the earliest possible opportunity. A total of 44 areas containing significant buried archaeological remains have been avoided and sufficiently buffered within the Project design as shown on the Illustrative Masterplan presented as ES Figures 2.1a – 2.4c [AS-020].

07/02/24 Policy

There is a very full summary of national and guidance is set out in Section 1.3 local heritage policy and guidance in
Section 1.3 of Appendix 7.1 (Desk-based Assessment). A summary of policy and guidance is in Chapter 7 of the PEIR - please note that during this consultation process the NPPF has been updated (December 2023).

Historic Environment Desk-based Assessment [APP-131]. It takes account of any changes to the NPPF up to the production of the ES.

The detailed summary of national Under Discussion and local heritage policy and guidance is set out in Section 1.3 of ES Volume 3, Appendix 7.1: Historic Environment Desk-based Assessment [APP-131]. It takes account of any changes to the NPPF up to the production of the ES.

07/02/24

We have also noted for your reference a number of policy areas of relevance to development within the setting of a WHS, particularly for renewable energy. In the main we did not identify reference to these in either the HIA or PEIR. The relevant National Policy Statements, in addition to policies in relation to the impacts on designated heritage assets (including World Heritage Sites), include policies with similar intent to that at paragraph 2 of the NPPF: "Planning policies and decisions must also reflect relevant international obligations and statutory requirements." Amongst those international obligations are the UK Government's duties under the Convention Concerning the Protection of the World Cultural and Natural Heritage (1972) - the World Heritage Convention.

NPS-EN1 (1.1.4): The Planning Act 2008 also requires that, where an NPS has effect, the Secretary of State must decide an application for energy infrastructure in accordance with the relevant NPSs except to the extent the Secretary of State is satisfied that to do so would lead to the UK being in breach of its international obligations.

These policies are refenced in Section 1.3 of ES Volume 3, Appendix 7.1: Historic Environment Desk-based Assessment [APP-131].

Under Discussion

Date	Topic	Outcome	Status
07/02/24	UNESCO's Policy Document on Climate Action for World Heritage (2023) was adopted by the General Assembly of States Parties at its 24th session in November 2023. It represents UNESCO's latest resource tool on responding to climate change. The policies within this document cover not only the impact of climate change on world heritage but also the effects of projects associated with climate action, such as renewable energy. They highlight the need for impact assessment with the aim of ensuring that the OUV of a World Heritage property is not negatively impacted.	This policy document is discussed within ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment [APP-141].	Under Discussion
31/07/24	Meeting held to discuss the further iteration of the Heritage Impact Assessment for the Blenheim Palace WHS.	The Applicant was appraised of Historic England's initial views on the further iteration of the Heritage Impact Assessment for the Blenheim Palace WHS. Points raised were addressed within the assessment presented as ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment [APP-141].	
24/08/24	Letter from Historic England setting out the issues raised and discussed at the meeting held on 31 July 2024.		Under Discussion
09/09/24 - 16/09/24	Exchange of e-mails leading to agreement of Viewpoints for additional visualisations requested by Historic England.	Additional viewpoints have been agreed with Historic England to confirm this position. These are being discussed with Historic England and a further update will be provided in due course.	
06/11/24	Visit to the Blenheim Palace WHS and the Project Site by the Historic England Advisory Committee (HEAC). Issues discussed included the lack of any visibility of the Project in views out of the WHS.	The Applicant presented a summary of work undertaken thus far leading to the preparation of the DCO submission. This included work relating to the likely impacts on the Blenheim Palace WHS, along with the likely impacts on other heritage assets of the highest level of significance such as the Scheduled Monument at Sansom's Platt.	Under Discussion

Date Topic Outcome **Status** 27/02/25 In relation to the HIA (Volume 3 Appendix The Applicant acknowledges Under discussion 7.4), whist the current document is much Historic England's comments improved, we feel there is further work regarding the Heritage Impact needed. It does not yet take account of or Assessment produced in respect directly address the concerns outlined by of the Blenheim Palace WHS (ES the ICOMOS Technical Review, regarding Volume 3, Appendix 7.4, [APPthe Botley West proposals, which also 141]). An updated version of the highlights concerns about cumulative Heritage Impact Assessment, impact with regards to applications for including the additional housing within Blenheim's setting. visualisations from the viewpoints Furthermore, the conclusions are yet to be agreed with Historic England, will supported by a comprehensive set of highbe submitted in to the quality visualisations to corroborate the Examination as soon as possible. results of the ZTV, which states there would The additional visualisations confirm the Applicant's statement be some visibility of the Project Site from land within the Blenheim Palace WHS. in the Heritage Impact Assessment produced in respect of the Blenheim Palace WHS (ES Volume 3, Appendix 7.4, [APP-141]), that no part of the Project would be visible from any location within the WHS. The Applicant will include 27/02/25 The HIA has also yet to demonstrate the **Under Discussion** decision-making process and evidence to information regarding the explain the decisions about the land parcels decision-making process that have been included and the regarding the inclusion of land methodology used to demonstrate how the parcels within the next version of sensitivity level of that land was decided the Heritage Impact Assessment. upon. Whilst the focus of the mapping is on This document focuses on the the impact to the WHS, a similar map for Blenheim Palace World Heritage the impact to other designated heritage Site and the assessment has assets impacted by these proposals should been undertaken in accordance also be produced. with specific guidance from UNESCO which applies to World Heritage Sites, therefore it would not be a suitable document in which to include heat sensitivity maps regarding other designated heritage assets. The assessment of effects on other designated heritage assets as a result of change within their setting is presented in ES Volume 3, Appendix 7.5: Settings Assessment [APP-142]. The Applicant considers that the methodology used for that assessment is in accordance with relevant guidance, specifically the 2017 Historic England guidance document The Setting of Heritage Assets, and that the production of heat sensitivity maps for any of these assets is not necessary in order for the assessment to be undertaken.

However, some of the additional

Date	Topic	Outcome	Status
		visualisations from the viewpoints	
		agreed with Historic Eng	gland
		relate to designated her	ritage
		assets outside the Blenl	heim
		Palace World Heritage S	Site.
		Consequently, these	
		visualisations will be pro	oduced
		within an annex to ES A	
		7.5: Settings Assessme	nt [APP-
		142] and an updated ve	
		that ES Appendix will be	
		submitted into the Exam	
		a suitable Deadline.	

27/02/25

In the PEIR, the requirement to undertake A programme of trial trenching further archaeological evaluation following geophysical survey was acknowledged and much of the Order Limits, with a it was stated that the programme of further evaluation would be carried out for the Environmental Statement. We understand that a programme of archaeological field evaluation through trial trenching is being carried out. An outline Written Scheme of Investigation has been included in the application documents (EN010147/APP/ 7.6.5) in which it is now stated that reports on the trial trenching will be submitted to the trial trenching are being prepared examination of the DCO application at the earliest opportunity. We will review this information when submitted and comment as appropriate.

Under discussion

has been undertaken within total of 885 trenches being excavated and recorded. The locations of all trenches, and the methodologies deployed for the fieldwork and recording, were agreed in advance with the Lead Archaeologist at Oxfordshire County Council. The reports on the results of this programme of and will be submitted into the Examination as soon as possible. The Outline Written Scheme of Investigation [CR1-005] sets out a proposed programme of further archaeological investigation to be undertaken in the event of the DCO being granted. Requirement 10 in Schedule 2 of the Draft Development Consent Order [AS-010] establishes that no part of the development could commence until an archaeological written scheme of investigation for that part has been agreed with the relevant planning authority. The written scheme of investigation must be substantially in accordance with the Outline Written Scheme of Investigation [CR1-005].

27/02/25

Following the recent acceptance of this DCO, Historic England will ensure that any appropriate correspondence to the UK State of the UK State Party and looks Party from UNESCO regarding the proposed scheme will also be submitted to correspondence on this matter. the Planning Inspectorate to inform the Examination.

The Applicant acknowledges the Under Discussion role of Historic England on behalf forward to seeing copies of any

Date	Topic	Outcome	Status
27/02/25	We note that the proposals include the option for the new Botley West National Grid Substation within the order limits of the southern section of the development site, otherwise it would be provided on land just outside the southern section of the development. Providing these remain the only locations for the Substation we have no comment to make on heritage grounds.	that these are the only potential locations for the new Botley West National Grid Substation.	Under Discussion
27/02/25	We will also comment on the assessment of the grade I and II* listed buildings, grade I and II* registered parks and gardens (RPG) and scheduled monuments across the whole development site, but will otherwise defer advice on grade II listed buildings and conservation areas to the local planning authorities (Cherwell, West Oxfordshire and Vale of White Horse District Councils).	regarding Grade II listed buildings and Conservation Areas will primarily be provided by the relevant local planning authorities	Under Discussion
27/02/25	With regards to the central part of the application site our principal concern relates to the harmful impact upon the Outstanding Universal Value (OUV) of the Blenheim WHS and the significance of the Blenheim grade I Registered Park and Garden and grade II listed Blenheim Palace through development in their setting. Based on the information available, Historic England considers that the majority of the Botley West Solar Farm would not affect the OUV of Blenheim. The exception to this is within the Central section, where some field parcels, due to their proximity and intervisibility with the boundary of Blenheim, make a particularly strong contribution to being able to experience the estate set within its rural countryside. The appearance of large-scale solar arrays in these field parcels would erode the aesthetic value that connects Blenheim with its setting. 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. The proposals would change the context the WHS, and the ensemble of the RPG and Palace, would be experienced within. Solar panels in the fields marked 2.1, 2.2, 2.5, and 2.20-2.26 in Figure 2b within ES Volume 3, Appendix 7.1: Historic	Blenheim Palace World Heritage Site (ES Volume 3, Appendix 7.4, [APP-141]) examines the likely impact of the proposals on the OUV of the Blenheim Palace WHS. The Heritage Impact Assessment identified a likely 'minor negative' impact on one attribute (Attribute 7) of the OUV. The overall assessment of likely impacts and effects on the historic environment is presented within ES Volume 1, Chapter 7: Historic environment [CR1-003]. The likely impact on the Blenheim Palace WHS is set out at 7.9.52 – 7.9.56 of that chapter. The magnitude of impact on the heritage significance of the WHS has been assessed as 'negligible adverse', based on the 'minor negative' impact on a single attribute of the OUV as identified in the Heritage Impact Assessment (ES Volume 3, Appendix 7.4, [APP-141]). The impact would be time-limited and	

Date Topic Outcome Status

Environment Desk-based Assessment

[APP-131] would detract from the traditional Relevant Representation, Historic character of the countryside and its relationship with the historic park as conveyed in Attribute 7, and therefore harm Blenheim's OUV and the significance of the ensemble of the RPG and the Palace. We recommend that solar panels on these fields are removed from the scheme.

The Applicant notes that in their England does not disagree with the Applicant's assessment of likely impacts and effects in respect of the Blenheim Place WHS. This applies to the detailed assessment of the likely impacts on the individual attributes that

In NPS terms we consider the proposals would harm the OUV of Blenheim WHS and Volume 3, Appendix 7.4, [APP-the significance of Blenheim Palace and RPG. In each case the harm would be less than substantial, and modest in degree. In the Settings Assessment [APP-142], with respect to the impact on the RPG, the impact was assessed as negligible adverse. In our view, the impact is greater than negligible.

The Applicant notes that in their Relevant Representation, Historic England does not disagree with the Applicant's assessment of likely impacts and effects in respect of the Blenheim Place WHS. This applies to the detailed assessment of the likely impacts on the individual attributes that contribute towards the OUV of the WHS (as set out in ES Volume 3, Appendix 7.4, [APP-141]), as well as the overall assessment of likely impacts and effects on the historic environment presented within ES Volume 1, Chapter 7: Historic environment [CR1-003].

The Applicant notes Historic England's comment regarding the likely impact on the Grade I listed Blenheim Palace. The assessment of the likely impact on this designated heritage asset is included as part of the overall assessment on the OUV of the Blenheim Palace WHS presented within the Heritage Impact Assessment (ES Volume 3, Appendix 7.4, [APP-141]).

The Applicant notes Historic England's comment regarding the likely impact on the grade I Registered Park and Garden at Blenheim Palace. The assessment of the likely impact on the heritage significance of this designated heritage asset is presented within paragraphs 1.9.23 - 1.9.27 of ES Volume 3, Appendix 7.5: Settings Assessment [APP-142]. This concludes that the likely impact would be greatest at the time of construction, reducing over time as new planting designed to screen views of the proposed development reaches maturity. The Applicant has assessed that the heritage significance of the Registered Park and Garden would be 'barely harmed', resulting in a 'negligible adverse' magnitude of impact that would be time-limited and fully reversible. For the magnitude of impact to be greater than

Date **Topic** Outcome Status 'negligible adverse' (as suggested by Historic England), the heritage significance of the Registered Park and Garden would have to be 'slightly harmed' or 'clearly harmed'. Whilst it is recognised that these terms are subjective, the Applicant maintains that 'barely harmed' is the correct assessment. However, the Applicant will continue to work with Historic England towards avoiding or further reducing any impacts on the heritage

> significance of the Blenheim Palace grade I Registered Park

> The detailed assessment of the

and Garden.

27/02/25

The scheduled Roman site at Sansom's Platt is now accepted to be the site of a Roman settlement associated with Akeman Street. The photomontages from viewpoint Monument at Sansom's Platt is 9 make clear that the development will be highly visible from the scheduled monument. Although the panels and fencingAppendix 7.5: Settings in this view will be screened by year 15, for Assessment [APP-142]. The a significant part of the life of the development they will remain visible. As a modern intrusion, they will detract from the significance of the monument through the impact upon the appreciation of the rural surroundings of this Roman settlement. In the Settings Assessment [APP-142], with respect to the impact on the scheduled monument, the impact is assessed as negligible adverse. In our view, the impact is greater than negligible. We note also that geophysical survey shows that the settlement may extend beyond the scheduled area in all directions. 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 Scheduled Monument lies in its true extent. Should the remains beyond the evidential values, with the scheduled area be found to be of national importance, we may revise our assessment retrieved through examination of of the impact upon the setting of the whole the buried archaeological settlement.

Under Discussion

likely impact on the heritage significance of the Scheduled presented within paragraphs 1.9.4 - 1.9.14 of ES Volume 3, assessment included a review of visualisations from Viewpoints 9, 10 and 11. The Applicant's assessment concludes that the likely impact would be greatest at the time of construction, reducing over time as new planting designed to screen views of the proposed development reaches maturity. The heritage significance of the Scheduled Monument would be 'barely harmed', resulting in a 'negligible adverse' magnitude of impact that would be time-limited and fully reversible. The greatest part of the heritage significance of the potential recovery of information features. These values would not be affected in any way by the proposed development. The setting of the Scheduled Monument makes some contribution towards its heritage significance, especially the presence of the Roman road (Akeman Street) which is directly

adjacent to the Scheduled area. The relationship between Akeman Street and the Scheduled Monument would not be affected by the proposed development.

Historic England refer to the photomontages from Viewpoint 19, stating that 'Although the 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'. The visualisation for Winter Year 1 is presented as Figure 8.264 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 2 of 9 [APP-073], with the visualisation for Summer Year 15 presented as Figure 8.266 in the same document. The Applicant considers that the edge of the proposed development has been pulled back from the Scheduled Monument such that an effective buffer zone has been established. The visualisation for Winter Year 1 would change as the new planting matures, to the extent shown in the visualisation for Summer Year 15 in which the proposed development is fully screened. However, this change is gradual and therefore the initial views of the proposed development would not continue right through until the establishment of the Summer Year 15 view. The Applicant therefore does not agree with Historic England's assertion that the proposed panels and fencing would remain visible 'for a significant part of the life of the development'.

A programme of trial trenching has been undertaken in the land around the Scheduled Monument. The reports on the results of this programme of trial trenching are being prepared and will be submitted into the Examination as soon as possible.

Date **Topic** Outcome **Status** 27/02/25 The central part of the Botley West Solar The detailed assessment of the **Under Discussion** Farm would harm the significance of the likely impact on the heritage Church of St Peter and St Paul, Church significance of the Grade I listed Hanborough (grade I: NHLE 1052991). This Church of St Peter and St Paul at is an early twelfth century church, which is a Church Hanborough is presented prominent landmark in Church Hanborough within paragraphs 1.9.27 – 1.9.31 and the surrounding area. The church's of ES Volume 3, Appendix 7.5: elevated position and very fine tall spire Settings Assessment [APP-142]. give the church its landmark qualities: it can The assessment included a be seen on the skyline throughout the review of visualisations from traditional agricultural landscape around Viewpoints 27 and 38. The Church Hanborough, which contributes to Applicant's assessment its significance as a rural place of worship. concludes that the proposed development would not preclude any existing views towards the The proposed development would change church and the spire would that experience when travelling south and remain visible as at present. east of the church and the village. However, elements of the Project Traditional agricultural fields in the would be visible in the foreground foreground would be replaced by the solar and middle ground in such views array. This would not disrupt views of the church spire, and its landmark qualities, but and consequently the setting of the church as experienced in it would erode the character of the church these views would change from within its traditional open agricultural the predominantly rural situation setting. In NPS terms, this would harm the as at present. The heritage significance of the church. The harm would significance of the church would be less than substantial and modest in be 'barely harmed', resulting in a degree. Careful consideration should 'negligible adverse' magnitude of therefore be given as to how best to impact that would be time-limited address this impact. In the Settings and fully reversible. Assessment [APP-142], the impact on the church is assessed as negligible adverse, however in our view, the impact is greater The Applicant acknowledges than negligible. Historic England's statement that any harm to the heritage significance of the Grade I listed Church of St Peter and St Paul at Church Hanborough would be less than substantial with regard to the terminology used in national planning policy. As such, the test set out in paragraph 5.9.32 of NPS-EN1 is the relevant test. 27/02/25 The significance of the Church of St Peter's, The detailed assessment of the **Under Discussion** Cassington (Grade I: NHLE 1367949), an likely impact on the heritage early twelfth century church, would also be significance of the Grade I listed harmed. Cassington sits on relatively flat Church of St Peter at Cassington lowland, however the undulating landscape is presented within paragraphs surrounding the village offer vantage points 1.9.32 – 1.9.34 of ES Volume 3, in which views towards the village, and St Appendix 7.5: Settings Peter's broach spire, can be appreciated. Assessment [APP-142]. The Due to the landscape depression the churchassessment included a review of sits within, the spire is not seen against visualisations from Viewpoint 42. clear sky, but instead against a backdrop of The Applicant's assessment agricultural fields. The proposed concludes that the proposed

development would not preclude

development would change those

Date **Topic Outcome Status**

> agricultural fields behind the church spire to any existing views towards the solar development. 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.

The effect of the proposed development, in NPS terms, would be to harm the significance of the church. The harm would be less than substantial harm, and modest in degree. There therefore needs to be careful consideration as to how best to address this impact. In the Settings Assessment [APP-142], the impact on the church is assessed as negligible adverse, however in our view, the impact is greater than negligible.

church and the spire would remain visible as at present. However, elements of the Project would be visible in behind and adjacent to the church tower in some views and consequently the setting of the church as experienced in these views would change. The heritage significance of the church would be 'barely harmed', resulting in a 'negligible adverse' magnitude of impact that would be time-limited and fully reversible.

The Applicant acknowledges Historic England's statement that any harm to the heritage significance of the Grade I listed Church of St Peter at Cassington would be less than substantial with regard to the terminology used in national planning policy. As such, the test set out in paragraph 5.9.32 of NPS-EN1 is the relevant test.

27/02/25

The significance of the Church of St Michael, Begbroke (Grade II*: NHLE 1291232), a late twelfth century parish church, would also be harmed. The church is situated to the northern edge of the village and can be seen from the agricultural fields. Whilst the church tower is Volume 3, Appendix 7.5: Settings part screened by trees, it is visible in views Assessment [APP-142]. This from the fields to the north. These fields provide a countryside setting for the church, church as experienced in some which contributes to its significance as a rural place of worship. From these fields, the church can be seen alongside the former St Philip's Priory and Church, and together these have group value in being a focal point in the landscape and indicating that the viewer is approaching an important reversible. ecclesiastical complex.

The proposed development would erode that agricultural setting to a small degree. The effect of the proposed development, in NPS terms, would be to harm the significance of the church. The harm would be less than substantial harm, and modest in degree. In the Settings Assessment [APP-142], the impact on the church is assessed as negligible adverse. In our view, set out in paragraph 5.9.32 of the impact is greater than negligible.

The detailed assessment of the Under Discussion likely impact on the heritage significance of the Grade II* listed Church of St Michael at Begbroke is presented within paragraphs 1.9.39 – 1.9.41 of ES concludes that the setting of the views would change. The heritage significance of the church would be 'barely harmed', resulting in a 'negligible adverse' magnitude of impact that would be time-limited and fully

The Applicant acknowledges Historic England's statement that any harm to the heritage significance of the Grade II* listed Church of St Michael at Begbroke would be less than substantial with regard to the terminology used in national planning policy. As such, the test NPS-EN1 is the relevant test.

