



## *Begbroke and Yarnton Green Belt Campaign (BYG)*

### Deadline 2: BYG WRITTEN REPRESENTATION 1

#### **Comments on the written summary of the evidence provided by Dominic Hare in the Open Floor Hearing on 13 May 2025 (RP1-098)**

1. In the transcript of the Open Floor Hearing held on 13 May 2025 it is recorded that Mr Hare commented as follows:

*"It is also a project which, through existing fund structure, will see an additional half £1 million a year ploughed back into the World heritage site for vital repairs, and we will seek to increase that during the project.....But sort of reiterate one thing I said here are existing mechanisms. I.e who exactly owns each bit of land means that inevitably a chunk of the underlying rents will flow to a maintenance fund which supports Blenheim Palace Heritage Foundation..... What it is is the main Blenheim Palace Maintenance Fund, which owns some of the fields under the proposed solar farm will receive rents from the promotor and the solar farm. The only place they can send that money legally is to the Blenheim Palace Heritage Foundation so the inevitable fund flow from the underlying rents will send £500,000 a year into the Heritage Foundation.*

2. The Written Summary of these comments provided by Blenheim (RP1-098) qualified these statements by referring to unencumbered freehold land owned by either the Blenheim Palace 1984 Maintenance Fund or the Vanbrugh Unit Trust. The following comments, also not included in the transcript, were also added by Mr Hare.

*"The land required for the solar project is held on trust. Income generated by the land must be applied to the World Heritage Site. This is a binding obligation on trustees, who provide account to HMRC on an annual basis. These are existing financial mechanisms in place today, passing funds to the Blenheim Palace Heritage Foundation.*

*Depending on the final design of the scheme and the exact land drawn down, that flow of funds will increase from around £80k pa today to in the region of £500k pa once developed out. All of this income will be committed to the maintenance and restoration of the World Heritage Site.*

*Accordingly, there is significant public benefit to be derived from the development of the solar project in the form of derived income supporting this important heritage asset”.*

3. However, the Blenheim Palace 1984 Maintenance Fund, which does have a legal obligation to pass its funds to the Blenheim Palace Heritage Foundation (via The Blenheim Foundation) does not appear to own any of the land listed in the Book of Reference (APP-023). Furthermore, there is no reference to any funds from the 1984 Fund being received by the Blenheim Palace Heritage Foundation in its financial accounts, other than the transfer of the ownership of a farm in 2013. The 1984 Fund would, therefore, appear to be an inactive entity which does not function as claimed.

4. The wider estate, owned by the Vanbrugh Unit Trust, does have an obligation to provide funds to the WHS. It has traditionally done so from developments undertaken by the Blenheim Estate in this part of Oxfordshire and possibly elsewhere. At the time of writing this submission, Blenheim currently has permission for over 400 houses which remain to be built in Woodstock on three sites, and many others remaining to be built elsewhere in WODC.

5. Blenheim regularly uses the argument that its proposed developments outside the WHS are necessary to fund the maintenance of the WHS. However, as far as we are aware this argument has never been accepted by WODC, PINS or the SoS by requiring conditions or legal agreements to be imposed on this basis. At the WODC Development Control Committee on 2 June, which discussed and approved the Council's WR to this Examination, the Woodstock Councillor, Elizabeth Poskitt, made a critical reference to this tactic being used frequently by Blenheim. A webcast of that meeting is available on the Council's website which confirms Cllr Poskitt's comment, and which also evidences the strength of feeling about this scheme.

The truth of Cllr Poskitt's observation is vividly illustrated by a further planning application for houses in Woodstock that has just been lodged by Blenheim Estate. Consultants acting on behalf of Blenheim Estate have made a Planning Application to Cherwell District Council for the construction of up to 500 houses on the field to the NE of the Bladon Roundabout (25/01510/OUT). This field is part of the BWSF draft DCO for the routing of cables.

6. On page 27 of this Application's Planning Statement, the following claim is made by Blenheim Estate:

*It is further highlighted that proceeds from the development will go towards the conservation of the Blenheim Palace WHS via the Blenheim Heritage Foundation, whose sole purpose is to repair and maintain the WHS. This is considered a significant heritage benefit resulting from the proposal. It is therefore demonstrated that the low level of "less than substantial harm" as a result of the proposals is outweighed by the heritage and other public benefits.*

This is another illustration of the way Blenheim endeavours to justify its development programme. It claims benefit for the WHS without ever committing to allocating monies, or to providing any detailed financial explanation of the

value of the development, or declaring how much of that value will be used for the maintenance of the WHS. The Estate seems to expect all its developments to be able to offset the harm they cause by a vague intention (never obviously fulfilled) to invest the proceeds into the WHS. The same can, of course, be said of its approach to BWSF.

7. The site field for this latest application has a complex planning history, which could be documented if helpful. In summary, Blenheim had an application for 1200 houses including this field rejected by CDC in 2015 (14/0004/OUT). The Estate made, and withdrew, an application for 500 houses in 2022/23 (22/01715/OUT). In both cases the proximity of the site to the WHS was an issue.

CDC included this field (PR10) in the draft 2011-31 Review of its Local Plan. It was criticised and rejected by the LP Inspector in his report (para 54), partly on the grounds of its proximity to the WHS, and removed from the Review which was subsequently adopted.

The latest iteration of Blenheim's application is in CDC's new draft Regulation 19 Local Plan as KID H1, an allocation for 450 houses. WODC has objected to its inclusion, partly on the grounds of its proximity to the WHS. CDC is due to send that draft by the end of July this year to PINS for Examination.

8. It is not, of course, the role of this Examination to form any view on the merits of this new housing application. However, we believe its submission and its history clearly indicates Blenheim's uncaring approach towards the setting of the WHS and its cynical approach to the planning system.

The 2024 ICOMOS Technical Review, which describes the adverse effect on the WHS of specific housing developments at the edges of Woodstock, is available to all those involved in this Examination, including Blenheim. It was attached to the RR of both WODC and HE. This Review was requested by, and made to, the UK Government.

The site of the new application by Blenheim was one of the four sites analysed by ICOMOS (all of them owned by Blenheim). The new application is on the same land as that described by ICOMOS as "*Land South of Perdiswell Farm*". The development proposal is very similar.

9. This Technical Review is critically important; great weight should be given to its analysis and conclusions. As they are available to the ExA we do not summarise them here, except to say a) that ICOMOS was clearly concerned about the adverse effect of the housing schemes proposed; and b) that it wanted to see a thorough evaluation undertaken before development was allowed to happen.

10. Within the current planning system the obvious and, perhaps only, place such a nationally significant issue should be judged and properly balanced is through the LP process. Yet despite the Review, Blenheim Estate, the self-declared guardian and carer of the WHS, has chosen to try to pre-empt the LP

process just before the start of a Local Plan examination with an opportunistic application.

Despite Mr Hare's comment in the hearing that "*We are proud to care for the World Heritage Site*" their submission of this application confirms that Blenheim Estate is more concerned with developing and monetising its land around the WHS than ensuring the protection of its setting. It indicates a disregard for the planning process, the two local District Councils, their officers and the people they represent.

11. Clearly, Blenheim does have funds from other developments, as well as extensive commercial activities on the WHS, available for the support of the WHS without BWSF. Significant financial resources also belonging to the Blenheim Estate are held offshore and are therefore opaque.

There is no evidence that money from BWSF is *needed* to maintain the WHS. In any event, there is no undertaking or guarantee from any Blenheim entity that any funds deriving from BWSF will be used to support it. Nor is Blenheim providing the detail of any such commitment to enable the SoS to understand what benefit the WHS might actually derive.

12. Any references to the WHS benefitting financially from BWSF are therefore unproven or entirely speculative. We suggest they should be ignored by the ExA in the absence of appropriate disclosure of the finances of the Estate in respect of BWSF; and in the absence of legally binding undertakings to allocate proceeds from BWSF to support specific projects on the WHS.

13. Finally, we would draw the ExA's attention to CDC's intention to decide on 25/01510/OUT by 8 September 2025. If this Application were to be approved, it would materially change the land use pattern around the central section of BWSF. We believe this should be reflected in the assessment of BWSF which would consequently need to be reworked. Our view is that the change in assessment would be significantly negative, as this development would add to the already substantial development planned for along the A44 corridor, further reducing the predominantly Green Belt gap between Oxford and Woodstock. This issue was described in BYG's RR-0092 (section 5, pp 21-25). When appropriate, we would wish to make further representations on this matter.

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