



Begbroke and Yarnton Green Belt Campaign (BYG)

Deadline 2: BYG WRITTEN REPRESENTATION 4

Comments on Deadline 1 WR from Historic England (HE)

1. In the conclusions to its WR (para 8.1), and the summary to that document (para 1.20), Historic England asserts that BWSF *"would contribute to the sustainability of the WHS"*. That conclusion does not appear to be drawn from either the text of their WR or any other documents produced by HE for this Examination.
2. As far as we are aware the only evidence presented which makes such an argument is by the CEO of Blenheim Estate, Dominic Hare. The assumption must therefore be that HE has accepted Mr Hare's argument. We propose that it would be wrong in principle for the Government's independent advisor simply to adopt the argument of a party closely affiliated to the Applicant. In addition, and as demonstrated in our separate Deadline 2 WR submission on the comments made by Mr Hare, the evidence he presented in respect of any benefit to the WHS deriving from the development of BWSF is neither conclusive nor robust.
3. There is a disparity between HE's overall conclusion and the detailed comments made in their WR about the ICOMOS Technical Review, which was attached to their RR (RR-0398-Appendix 1). It is suggested by HE (1.16a) that there are gaps in the Applicant's Heritage Impact Assessment because there is no reference to the Technical Review. As HE points out (3.8), this expressed concern about the BWSF proposal's potential impact on the WHS's OUV due to the consequent change it expected in the character of the surrounding landscape. However, HE has chosen to ignore this aspect of the Technical Review altogether. In 3.5 it is suggested that certain land parcels should be removed *"as these fields are locations in which the Blenheim ensemble can be appreciated from open countryside"*. This is very different from ICOMOS's principal concern that *"the proposal would lead to a large change in the 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"* (3.8).
4. HE has chosen not to address this aspect even though it is *"the government's statutory adviser on all matters relating to historic environment, including world*

heritage". Surely the concerns expressed by ICOMOS in respect of the impact on the OUV of the WHS resulting from "*large change in the landscape character of the setting*" should also have been addressed by HE as a matter of importance in its conclusion?

5. On the contrary, HE simply concludes (8.2) that any harm to the OUV will be avoided by "*removing the solar panels from the fields immediately to the south of Bladon*". There is no caveat offered regarding the views expressed by ICOMOS.

6. ICOMOS International has been requested to update their Technical Review (3.10). In the absence of HE`s consideration of the wider setting as outlined above, this updated review will clearly be very important. No indication has yet been given as to when it might be available.
