



**EXAMINING AUTHORITY'S FIRST SET OF WRITTEN QUESTIONS**

**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: 1<sup>st</sup> JULY 2025**

## **ExA Written Questions –General observation; clarification required between ICOMOS and ICOMOS-UK**

We note that in the Examining Authority's first written questions, there are a number of questions which refer to 'ICOMOS'. We believe the questions relate to points made in submissions by ICOMOS-UK.

To assist the Examining Authority we have set out the following explanation of the different organisations and roles of ICOMOS (International) and ICOMOS-UK.

**ICOMOS** is one of three Advisory Bodies to the UNESCO World Heritage Committee listed in the World Heritage Convention. Their role is to provide advice to the Committee on the implementation of its programmes and projects, to assist in the preparation of the Committee's documentation, and to attend Committee meetings in an advisory capacity. ICOMOS provides technical advice (Technical Review reports), via the World Heritage Centre, about the impact of proposals potentially affecting the OUV of World Heritage Sites.

**ICOMOS-UK** is the UK National Committee of ICOMOS. It is a UK-based Charitable Incorporated Organisation (CIO) which promotes appreciation and understanding of cultural heritage conservation, policy and practice in the UK and worldwide as well as providing independent advice. It has a special focus on World Heritage Sites. It is not an advisory body to the World Heritage Committee.

## **ExA Written Question – 1.6 Cultural Heritage**

### **1.6.9 – Aerial Views**

**Question: Aerial views over the World Heritage Site (WHS) and wider landscape are readily available from planes flying to and from Oxford Airport and RAF Brize Norton. Drone footage that includes views of the wider landscape is also seen in advertising literature for Blenheim Palace and in addition, the new rooftop tours at the Palace will afford greater views out towards the surrounding countryside.**

**Do you consider that such views should be taken into account in terms of assessment of the setting?**

As set out in Historic England's Good Practice Advice in Planning Note 3 'The Setting of Heritage Assets', setting is the surroundings in which an asset is experienced (page 2). Blenheim Palace WHS's close proximity to Oxford Airport means it is regularly experienced by low flying aircraft landing and departing from the airport. Whilst Blenheim was not designed to be seen from the air, these aerial views can offer a unique perspective in which the relationship between the World Heritage Site and its wider landscape can be appreciated in a way that isn't possible from ground level.

As set out in our Written Representations ([REP1-086](#) 5.26-5.27) '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. 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).

The time depth of the area and the patchwork of historic landscape features connected to the Blenheim Estate can be appreciated from the air. These aspects of the significance of the WHS and elements within it have been identified through aerial photography see WHS Management Plan 3.12 and 4.32. Aerial views therefore could be considered as part of the assessment.

With regards to the Blenheim rooftop tours, we understand that this is a temporary offer as part of the major restoration of Blenheim's Palace roof. Whilst there may be some crossover between the construction phase of the Botley West Solar Farm and the Roof project, the rooftop publicly accessible tour is focused on the north front of the house, so the views out over the landscape are focussed in the opposite direction of the central section of the Botley West Solar Farm. Based on the available timeframes (the external scaffold is expected to begin being taken down in March 2026, with complete scaffold removal expected in January 2027, whilst the Botley West Solar Farm, if consented, would be operational by October 2027), and subject to the results of the visualisations we have requested, we do not consider the need to assess these rooftop views.

#### **ExA Written Question 1.6.13 – Response to Historic England's DL1 Submission**

**Whilst some areas overlap with ICOMOS' suggestions, the ExA are also keen to explore the suggestions of Historic England as to the field numbers that should be excluded from development in order to maintain Blenheim's OUV.**

**Provide any comments you wish to make and then, on an individual and cumulative basis, summarise the likely overall impact of such exclusions on the solar farm's operational viability.**

Historic England welcomes this question to the Applicant. We will review the Applicant's response and provide any relevant comments at Deadline 3.

#### **ExA Written Question 1.6.14 – WHS Buffer zone**

**Question: The Blenheim Palace and Park World Heritage Site Management Plan 2017, Appendix III (Settings Study), indicates in chapter 2 that a formal buffer zone was not deemed necessary at the time of production due to existing designation protections, such as the Cotswold National Landscape, the Oxford Green Belt, and WODC Policy EW9 that includes wording designed to protect the wider landscape from potentially harmful development.**

**Would the omissions proposed in the ICOMOS and Historic England DL1 submissions provide sufficient buffer to protect the rural landscape that is important to the setting of Blenheim Palace?**

We can confirm that there is no Buffer Zone at present and no proposed buffer zone to this World Heritage Site.

With regards to the decision making on whether a buffer zone is required for individual properties we would direct you to our Written Representations ([REP1-086](#) 5.20), which clarifies this process.

In our Written Representations we considered the important contribution made by the rural landscape setting of the property to its OUV could be protected if solar panels were omitted from a number of the fields to the south of Bladon ([REP1-086](#) 8.2).

This recommendation takes account of the contribution made by each of the fields included within the scheme, as part of the property's setting, to its attributes of OUV ([REP1-086](#) 3.5, 5.32-5.38).

Our Written Representation considers the character of the rural landscape, including how it transitions from traditional rolling farmed and wooded countryside to dense tree shelterbelt and how different parts of the property's setting exemplify this traditional character ([REP1-086](#) 5.35) (Attribute 7).

Our representations also set out the understanding of the way in which Blenheim Palace influenced the use and management of the wider estate, and from where within its setting there is opportunity to experience how that relationship shaped the surrounding landscape ([REP1-086](#) 5.32) (Attribute 1). The combination of the fields, woodlands, and Bladon village in the shadow of Blenheim provides a snapshot of the wider historic landscape character that surrounds and was part of Blenheim's landed estate (Attribute 1). Preservation of the experience of these rural surroundings supports the maintenance of Blenheim's OUV ([REP1-086](#) 5.36).

Where visual connections exist between the surrounding land and the property, the Blenheim ensemble with its designed landscape and stone wall boundary can be appreciated as the pre-eminent feature within this landscape ([REP1-086](#) 5.33, 5.36) (associated with elements of Attribute 4). Similarly, where the property's veteran and ancient trees can be seen from within its setting, the direct physical link back to when the royal deer park was established at Woodstock (an element of Attribute 5) can still be appreciated ([REP1-086](#) 5.37).

Moving south and further away from the WHS that experience and intervisibility 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 undiscernible from the Oxfordshire countryside more generally. ([REP1-086](#) 5.38).

We therefore considered that these targeted changes to the scheme would be sufficient to avoid harm to the contribution made by the rural landscape to the significance of the WHS and to maintenance of its attributes of OUV ([REP1-086](#) 8.2).

**ExA Written Question 1.6.24 – Swinford Bridge (Gd II\*) and Hoardley House (Gd II\*)**

**Question: The ExA note that you have not included reference to Swinford Bridge or Hoardley House in either your RR [RR-0398] or your DL1 submission. Please confirm whether you have any particular concerns regarding the setting of these Grade II\* Heritage Assets**

As set out in our Written Representations ([REP1-086](#) 1.5) Historic England advice has focussed on those highly designated heritage assets that have the potential to experience significant effects, and these were the Blenheim World Heritage Site, Blenheim Registered Park and Garden, Sansom's Platt Scheduled Monument and the churches of St Peter and St Paul in Church Hanborough, St Peter's in Cassington and St Michael's in Begbroke.

**ExA Written Question 1.6.36 - Outline Written Scheme of Investigation**

**Question: Are you in agreement with all aspects of this document [CR1-005]? Please provide any concerns/ amendments etc in full.**

We understand that the Oxford County Council Archaeological Service (OCAS) are best placed to respond to this as they will be agreeing all subsequent site-specific methodologies (see paras 1.6.3 and 1.6.4 of the OWSI). We note the concerns referred to in the *Joint Local Impact Report of Cherwell District Council Vale of White Horse District Council West Oxfordshire District Council Oxfordshire County Council* (REP1-072, paras 7.2.101-103) and support the view that the OWSI must be agreed with OCAS at an early stage.

**ExA Written Question 1.6.37 - Designated Archaeological sites**

**Question: Based on the evidence provided in [APP-133] and [APP-143] and with regards to a) Sansom's Platt, b) Rectangular Earthworks, Hensington, c) Blenheim Villa and Associated field system:**

- 1) Are you in agreement with the significance assessment of these Scheduled Monuments?**
- 2) Do you agree with the buffer zones that are proposed?**

Based on the evidence provided in [APP-133] and [APP-143] and with regards to a) Sansom's Platt, b) Rectangular Earthworks, Hensington, c) Blenheim Villa and Associated field system:

1. ES Volume 1, chap 7, p83, table 7.15 (APP-044) identifies the three scheduled monuments as being of high sensitivity/value, and we are in agreement with that.
2. With respect to the impact upon Rectangular Earthworks, Hensington and Blenheim Villa scheduled monuments, we agree that the magnitude of impact through development in their setting is likely to be negligible adverse, and to that extent the buffer zones are acceptable.

With respect to Sansom's Platt, we believe the magnitude of impact is greater than negligible adverse, and an increased buffer area might be a way to reduce the impact to negligible, subject to further assessment. But as we have said in our written representation, there is also the possibility that the area of nationally important

archaeological remains may be greater than the area currently scheduled. This needs to be established through trial trenching. Without the results of that trial trenching it is not possible to assess potential harm to the area of nationally important remains, and so it is not possible to assess what buffer might be appropriate.

#### **ExA Written Question 1.6.45 - Archaeological Investigations**

**Question: ES Chapter 7 [CR1-003] paragraph 7.4.13 states that archaeological trial trenching was commenced in August 2024 and the report will be submitted as soon as possible.**

- 1) Submit these results or provide an update on when you expect to be able to submit.**
- 2) Respond to paragraphs 5.69 and 5.70 of Historic England's DL1 submission.**

Historic England welcomes this question to the Applicant. We will review the Applicant's response and provide any relevant comments at Deadline 3.

#### **ExA Written Question 1.7 Draft Development Consent Order 1.7.27 - Management Plans**

**Question: A number of management plans are submitted with the application.**

- 1) Review those management plans and set out clearly what changes, if any, you consider necessary. It may be better to put these in a tabular format. As long as the rationale behind the proposed amendments are explained.**
- 2) Are there any management plans promised in the future (see Table 1.1 of the Outline Code of Construction Practice) that you consider are important or critical to be reviewed during the Examination, and thus the Applicant should submit now?**

1) Historic England has reviewed the following management plans submitted within the application:

APP 234 7.6.2 - Outline Operational Management Plan

APP-235 7.6.3 - Outline Landscape and Ecology Management Plan

APP-236 7.6.4 - Outline Decommissioning Plan

APP-238 7.7 - Outline Layout and Design Principles

We only wish to make comment on the Outline Landscape and Ecology Management Plan (APP-235 7.6.3) (OLEMP). We consider the document could better integrate the historic environment into the Landscape Design Objectives (2.1) and promote how the landscape proposals will seek to preserve and enhance the surrounding historic environment.

As set out within Historic England's Written Representations ([REP1-086](#) 5.91), one such example of better integration would be in relation to the Public Right of Ways (PROW). We considered expanding the width of the PROW through the fields with the solar development where designated heritage assets, in this case St Michael, Begbroke (grade II\*: NHLE 1291232), can be experienced would help mitigate some of the impact. Encouraging such an approach can help retain a greater sense of the open countryside setting of the heritage



asset, reducing the harm caused. We recommend the OLEMP should include provision for such mitigation to address impacts to the historic environment.

Hard Landscape features (3.3) include aspects such as new cycle paths, access and an education building. These elements, without careful consideration of the detailing and finish can have adverse impacts on the character of an area and the setting of heritage assets. The OLEMP therefore could include some broad design principles for these elements, so there is some assurance over the suitability and type of materials to be used.

2) With regards to future management plans as set out in the Outline Code of Construction Practice Table 1.1, its Historic England's view that the Construction Artificial Light Emission Plan, Construction Fencing Plan and Construction Noise and Vibration Management Plan would help to ascertain the possible effects the construction phase would have on the setting of highly designated heritage assets. It would be particularly useful to see the Artificial Light Emission Plan to assess any light spill effects on the World Heritage Site and its setting.

## **ExA Written Question 1.14 Landscape Resource and Visual Amenity**

### **1.14.6 - Viewpoints and Photomontages**

**Question: Notwithstanding any consultations already received, are you happy with the number, range and direction of views provided and also with the number and range of photomontages? If not, please indicate the location and direction of other views that you feel are important, or if already provided at DL1, please signpost these.**

Whilst this question is directed to the local authorities, we would note that we have requested some additional photomontages/viewpoints ([REP1-086](#) 6.14 - 6.20). We will review these once received and provide comments as appropriate on this matter at Deadline 3.

### **ExA Written Question 1.14.8 - Lighting**

**Question: Table 8.5 of the ES [PDB-006] contains details of the Planning Inspectorate's concern regarding lighting and the impacts at night-time. The Applicant's brief sentence about this in Table 8.5 does not provide adequate justification for scoping such a matter out of the ES. Provide greater detail as to why it is felt night-time impacts would not be observed for this project.**

Whilst this question has been directed to the Applicant, we would note that in our Written Representation ([REP1-086](#) 5.6, 6.6-7, 6.11-13) we expressed concern over the lack of a lighting strategy within the ES and assessment of the nighttime effects the development may have on the historic environment, including within the Heritage Impact Assessment.

Our concern is primarily focussed on whether there would be any lighting effects from within the fields to the south of Bladon, which in our view contributes positively to the setting of the Blenheim World Heritage Site.

We therefore welcome the Examining Authority's Question with regards to this matter. We look forward to reviewing the Applicant's response and, where appropriate, we will provide comment on this for Deadline 3.