

ICOMOS Technical Review

Property	Blenheim Palace
State Party	United Kingdom of Great Britain and Northern Ireland
Property ID	425
Date of Inscription	1987
Criterion	(ii)(iv)
Project	Botley West Solar Farm

I. Introduction

On 4 March 2025, the State Party of the United Kingdom of Great Britain and Northern Ireland submitted a Paragraph 172 Notification to the World Heritage Centre with regard to the proposed development of a solar farm in the wider setting of the World Heritage property Blenheim Palace. This notification followed on a 13 October 2023 submission of information by the State Party,¹ which was reviewed by ICOMOS. The outcomes of the ICOMOS review are presented in a Technical Review dated February 2024 (Annex A).

In the letter dated 4 March 2025, the State Party indicated that it was awaiting the submission of representations from Historic England. A subsequent Paragraph 172 Notification submitted by the State Party, dated 13 May 2025, notified the World Heritage Centre that representations from registered Interested Parties to the Examination had been received. The State Party also indicated that the examination of the Botley West Solar Farm (Application Reference: EN010147) has commenced and will close on 13 November 2025.

The State Party's Paragraph 172 letter contains numerous weblinks, providing access to, among others:

- The planning inspectorate website, which includes an evolving collection of documents, at the time of writing numbering 565 documents, collated in an Examination Library (the version referred to in this Technical Review is dated 'Updated – 24 June 2025');
- The Botley West Solar Farm: Environmental Statement:
 - Non-Technical Summary;
 - Volume 1, Chapter 6: Project Description;
 - Volume 3, Appendix 7.1: Historic Environment Desk Based Assessment;
 - Volume 3 Appendix 7.4: Blenheim Palace World Heritage Site - Heritage Impact Assessment;
- Historic England's Representation, submitted on 26 February 2025, in a redacted version (some text blacked out).

On 18 July 2025, the State Party updated the World Heritage Centre of changes to the proposed scheme through a Paragraph 172 Notification.

¹ In response to a Paragraph 174 request for information sent to the State Party by the World Heritage Centre on 21 July 2023.

The State Party's submission describes these changes presented by the project's proponent, summarized as:

At this stage we understand that there are 11 changes proposed and have broadly summarised these as follows:

- *The removal of solar panels on land to the south west and south east of Bladon 'to protect the setting of the Blenheim Palace World Heritage Site' in response to feedback from Interested Parties including Historic England;*
- *A reduction in the solar installation area near to Oxford airport;*
- *Refinements of project layout and design some of which will either remove or reduce solar installation in various locations within the boundary for the scheme;*
- *Clarification regarding the role of the community educational facility.²*

The State Party submission includes numerous hyperlinks including to the project proponent's letter to the Planning Inspectorate outlining its intention to Submit a Request to Change the Application.

In this letter, the applicant outlines that the proposed changes to the scheme are proposed following engagements with: *affected landowners and key stakeholders* and to: *alleviate any concerns in relation to potential environmental impacts and reduce land take where suitable alternative proposals are available.*³ This includes responding to the advice provided by Historic England, which recommended the removal of proposed areas from the solar photovoltaic development in the direct vicinity of the Blenheim Palace World Heritage property.⁴

II. Background

Blenheim Palace was inscribed on the World Heritage List in 1987, in Decision 11 COM VII.A on the basis of its meeting criteria (ii) and (iv).

In 2008, the World Heritage Committee adopted a Statement of Significance for the property in its Decision 32 COM 8B.95, and subsequently in 2013, a Retrospective Statement of Outstanding Universal Value in Decision 37 COM 8E.

The World Heritage Committee in 2023 adopted a proposal from the State Party for the clarification of the property's boundaries (Decision 45 COM 8D).

² Department of Culture, Media and Sports, 18 July 2025. *Paragraph 172 Notification: BLENHEIM PALACE WORLD HERITAGE SITE*, pp. 1-2.

³ Photovolt Development Partners GmbH (PVDP) on behalf of SolarFive Ltd, 2025 (1 July), *Application ref: EN010147: Application by Photovolt Development Partners (PVDP) on behalf of SolarFive Ltd (the Applicant) for a Development Consent Order for Botley West Solar Farm: Notification of Intention to Submit a Request to Change the Application (Change Request 2)*, p. (2, not numbered).

⁴ *Ibid.*, p. 3 (not numbered).

Statement of Outstanding Universal Value

Brief synthesis

Blenheim Palace, in Oxfordshire, was designed by John Vanbrugh. The English nation presented the site to John Churchill, first Duke of Marlborough, in recognition of his victory in 1704 over French and Bavarian troops, a victory which decided the future of the Empire and, in doing so, made him a figure of international importance. The Palace sits within a large walled landscape park, the structure by Vanbrugh overlaid by the designs of Lancelot "Capability" Brown from 1761 onwards.

The design and building of the Palace between 1705 and 1722 represented the beginning of a new style of architecture and its landscaped Park, designed by Lancelot "Capability" Brown, is considered "a naturalistic Versailles".

In tangible form, Blenheim is an outstanding example of the work of John Vanbrugh and Nicholas Hawksmoor, two of England's most notable architects. It represents a unique architectural achievement celebrating the triumph of the English armies over the French, and the Palace and its associated Park have exerted great influence on the English Romantic movement which was characterised by the eclecticism of its inspiration, its return to natural sources and its love of nature.

The original landscape set out by John Vanbrugh, who regulated the course of the River Glyme, was later modified by Lancelot "Capability" Brown who created two lakes, seen as one of the greatest examples of naturalistic landscape design.

Blenheim Palace was built by the nation to honour one of its heroes John Churchill, the first Duke of Marlborough, and is also closely associated with Sir Winston Churchill.

The justification of the application of criteria (ii) and (iv) is:

Criterion	Justification
(ii): exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;	<i>By their refusal of the French models of classicism, the Palace and Park illustrate the beginnings of the English Romantic movement, which was characterised by the eclecticism of its inspiration, its return to national sources and its love of nature. The influence of Blenheim on the architecture and organisation of space in the 18th and 19th centuries was greatly felt both in England and abroad.</i>
(iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;	<i>Built by the nation to honour one of its heroes, Blenheim is, above all, the home of an English aristocrat, the 1st Duke of Marlborough, who was also Prince of the Germanic Holy Roman Empire, as we are reminded in the decoration of the Great Drawing Room [the Saloon] by Louis Laguerre (1719-20). Like the World Heritage properties Residence of Würzburg and the Castles of Augustusburg and Falkenlust in Brühl, Blenheim is typical of 18th century European princely residences.</i>

The full Retrospective Statement of Outstanding Universal Value for Blenheim Palace World Heritage property is available at: [REDACTED]

The property boundary follows the eighteenth-century dry stone wall, which defines the extent of the park. The property has no defined buffer zone.

Development pressures in the setting of the property

In February 2024, ICOMOS provided a Technical Review (Annex B) in which it reviewed four proposed and partially approved urban development projects in the setting of the property submitted by the State Party in response to a request under Paragraph 174 of the *Operational Guidelines for the Implementation of the World Heritage Convention*. These include developments at Land East of Woodstock, Land East of Hill Rise, Land North of Banbury Road, and Land South of Perdiswell Farm. In the Technical Review, ICOMOS notes that while two of the developments had already been granted planning permission, others remained undecided or had been withdrawn.

ICOMOS concluded in that Technical Review that the approved projects have already led to a cumulative erosion of the property's rural setting and negatively affect its Outstanding Universal Value (OUV), and warned that the remaining proposals—if granted—could intensify this harm. The Technical Review found that the current Management Plan and local planning framework do not sufficiently protect the property's setting, particularly in the absence of a buffer zone. ICOMOS recommends that no further development in the setting be approved until a comprehensive Landscape Character Assessment is undertaken and a revised Management Plan is adopted.

Recall of the conclusions of the ICOMOS February 2024 Technical Review of the Botley West Solar Farm proposal

In its February 2024 Technical Review, ICOMOS noted that:

- *The Botley West Solar Farm proposal will affect the wider setting of the Blenheim Palace World Heritage property, and therefore may have an impact on the maintenance of its Outstanding Universal Value,*
- *The proposal should be assessed through an iterative Impact Assessment, that identifies development alternatives and mitigation measures to avoid negative impacts and ensure the maintenance of the Outstanding Universal Value of the property,*
- *The objectives of positive contributions to reductions in carbon emissions of the Botley West Solar Farm should be achieved while safeguarding the Outstanding Universal Value of the Blenheim Palace World Heritage property.*

[...] ICOMOS also notes that Historic England has advised that the preliminary standalone HIA should be further developed. ICOMOS concurs with this assessment. ICOMOS advises that such a further development should focus on:

- *The revision and more thorough inventory of the attributes that contribute to the Outstanding Universal Value, as this is very underdeveloped in the November 2023 version of this document,*
- *A further development of the relationship between property and its setting, including its wider setting, that explores the linkages between property and (wider) setting beyond only direct visual relationships, but also establishes how the wider setting supports the maintenance, legibility and experience of the property from the perspective of land use, spatial organization, social and cultural practices, perceptions and associations,*
- *The fact that the property has no defined buffer zone to provide an additional layer of protection to the property,*
- *The setting and wider setting are under threat from diverse development proposals, meaning the cumulative impacts should be carefully considered.*

To achieve the above, ICOMOS additionally advises that:

- *The proponent of the development commission a Landscape Character Assessment, specifically focussed on the relationship between the wider setting of the property and its Outstanding Universal Value as a baseline assessment from which a further assessment of the impact on the Outstanding Universal Value of the property can be further developed. Such a Landscape Character Assessment should:*
 - *Be undertaken as foundational study to allow for the further development of the HIA, noted above,*
 - *Assess the efficacy of the management of the immediate and wider setting in maintaining the landscape character of the immediate and wider setting of the property, and*
 - *clearly explore the importance of the wider setting, also in the understanding of the immediate setting and wider setting as that what is passed through in the approach to the Park and Palace that cumulatively may have a large negative impact on the OUV of the property.*

In conclusion, ICOMOS, based on the material at its disposal, advises that it considers that the proposal will likely have an adverse impact on the Outstanding Universal Value of the World Heritage property and advises that the proponent consider alternative locations for this development to avoid these negative impacts on the Blenheim Palace World Heritage property.

ICOMOS also expresses its concern at the level of development pressure on the immediate setting and wider setting of the property, specifically in this context where the property has no buffer zone defined to provide it with an extra layer of protection. The continued erosion of the landscape character of the immediate and wider settings pose an imminent danger of erosion of the contribution of the setting of the property to its Outstanding Universal Value.

Should the proponent wish to continue to consider the project, ICOMOS recommends that the State Party submit further developed iterations of the PEIR, the proposed Landscape Character Assessment and the preliminary standalone HIA for review before any further decisions are made on the future implementation of the project.

Historic England's Representation

Historic England, in its representation does not object in principle to the Botley West Solar Farm. Historic England expresses significant concerns about its impact on highly designated heritage assets, particularly the World Heritage property, and several listed churches and scheduled monuments.

Historic England, noting that the World Heritage property is of the very highest significance and therefore should *attract particularly great weight in the planning balance*, concludes that the proposal would cause *less than substantial harm, and modest in degree*⁵ harm to the property's OUV, due to solar development within its traditional countryside setting. The inclusion of fields in the Central site area, notably parcels 2.1, 2.2, 2.5, and 2.20-2.26 (as numbered in Figure 2a of the November 2024 Historic Environment Desk Based Assessment), is identified as particularly harmful. Historic England recommends removing solar panels from these parcels. Historic England also asserts that Blenheim Palace's OUV deserves particularly great weight in the planning balance, and that the current proposal—while not opposed outright—requires targeted changes to ensure compliance with national

⁵ Historic England, 27 February 2025. *PINS Registration and Relevant Representation Form on behalf of Historic England Section 56 : Project: Botley West Solar Farm*, p. 9.

and international heritage protections. Historic England notes that: *the application would benefit from further assessment*.⁶

ICOMOS recalls that Paragraph 102 of the *Levelling-up and Regeneration Act 2023* introduces a statutory duty relating to the protection of World Heritage properties. Specifically, it mandates that requirement that, when determining planning applications, decision-makers must have “special regard to the desirability of preserving the setting of a World Heritage Site”, in addition to preserving the site itself.

Historic England also responds to the HIA (Volume 3, Appendix 8.4) version available to it at the time of the evaluation (February 2024), noting that:

*... whilst the current document is much improved, we feel there is further work needed. It does not yet take account of or directly address the concerns outlined by the ICOMOS Technical Review, regarding the Botley West proposals, which also highlights concerns about cumulative impact with regards to applications for housing within Blenheim's setting...*⁷

and noted that it will review further information and visualization when these are submitted and comment as appropriate.

III. The Blenheim Palace World Heritage Site - Heritage Impact Assessment

a. Key changes to the project design since the ICOMOS February 2024 Technical Review included in the Blenheim Palace World Heritage Site - Heritage Impact Assessment

Between the Preliminary Environmental Information Report (PEIR, November 2023) and the Environmental Statement (November 2024), the Botley West Solar Farm project underwent a number of refinements. These adjustments reflect ongoing design development, environmental assessments, and feedback from consultation.

- The total solar array area was reduced by approximately 45 ha (from 884.7 ha to 839.2 ha), primarily to protect archaeological features, enhance bat foraging corridors, and ensure a consistent 25 m buffer from residential properties (PEIR Figures 2.1A–2.3; ES Figures 2.1A–2.3).
- The maximum panel height was lowered from 2.5 m to 2.2 m to reduce visual and heritage impacts, while still accommodating grazing beneath the arrays.
- The Environmental Statement formalizes the inclusion of conservation grazing across the site and the provision of up to 30 ha for community food production, building on the indicative plans in the PEIR.

Specific to Blenheim Palace, the Environmental Statement identifies several changes made to the Botley West Solar Farm project, particularly between the Northern and Central Site Areas.

- The cable corridor near the Woodstock Road and Bladon Roundabout is modified to reduce potential impacts on sensitive heritage and landscape receptors, including the setting of Blenheim Palace.

⁶ Ibid., p. 10

⁷ Ibid., p. 3.

- In the Northern Site Area, landscape planting proposals were altered to avoid disturbing important underground archaeology. In at least one location, the orientation of proposed woodland planting was changed, and nearby planting was adjusted to maintain or improve visual screening. These changes are relevant to key viewpoints, including those potentially affecting views towards or from the property.

b. The Blenheim Palace World Heritage Site - Heritage Impact Assessment

The project proponent has further developed the preliminary standalone HIA, contained in the PEIR, and a draft completed in November 2024.

The HIA concludes that the Botley West Solar Farm would result in a minor negative impact on the OUV of the property. This judgement is based on the finding that the development would not affect the majority of attributes, including the key views from within the Palace and its landscape. The only identified effect relates to Attribute 7, concerning the property's relationship with its traditional rural setting. Here, the HIA acknowledges that the introduction of solar infrastructure would alter the perception of the surrounding countryside, but considers this change to be limited in scale, temporary (35-42 years, resulting in a date of removal in 2071), and fully reversible. With mitigation measures in place—such as careful site layout and visual screening—the HIA concludes that there would be no permanent harm to the property's OUV.

The HIA shows some progress but does not fully address the key concerns outlined in its February 2024 Technical Review. While the HIA follows recognized methodology, the HIA relies on the World Heritage Site Management Plan's predefined list of attributes, without applying an independent methodology for identifying and analysing OUV. It recognizes the property's relationship with its rural setting (Attribute 7 identified in the Management Plan), but does not provide *a revision and more thorough inventory of the attributes that contribute to the Outstanding Universal Value, as recommended by ICOMOS in its February 2024 Technical Review.*

The assessment does not meaningfully explore how the broader landscape setting supports the property's Outstanding Universal Value, including through and use, spatial organization, or cultural associations. It approaches the relationship between the property and its setting primarily in visual and physical terms, focusing on visibility from within the property, topographical screening, and key outward views.

There is little consideration of how changes in land use—such as the shift from arable farmland to energy infrastructure over a period of 35-42 years—might affect the legibility or perception of the designed landscape, or how the arrangement of rural villages, approach routes, and their spatial relationship to the estate contribute to the experience of OUV. Similarly, the assessment does not address the symbolic or cultural significance of the setting, such as the Arcadian landscape ideals associated with Blenheim—an issue specifically raised by ICOMOS.

The HIA concludes that, because the development is not visible from within the Palace, any impact on OUV will be minor and reversible. However, ICOMOS has stressed that setting should be understood more broadly, incorporating perceptual, cultural, and experiential dimensions. These remain largely unexplored in the November 2024 HIA.

A major omission is the absence of a Landscape Character Assessment, which ICOMOS identified as essential to understanding how the wider setting supports OUV. Instead, the HIA describes the surrounding landscape as having “generally low” sensitivity - a judgement ICOMOS explicitly rejects given the site's designed and Arcadian context.

The HIA also fails to assess cumulative impacts. It does not consider how the solar farm, in combination with other nearby developments, might contribute to a gradual erosion of the World Heritage property's setting. Nor does it account for the absence of a buffer zone or explore alternative layouts to reduce harm.

In summary, while the HIA incorporates mitigation and avoids direct visual intrusion, it lacks the depth and contextual understanding of setting and landscape character that ICOMOS has advised should inform decision-making.

ICOMOS does not agree with the conclusion that the proposal will lead to a 'minor negative' impact, or '*less-than-substantial harm, and modest in degree*' on the OUV of the property.

IV. Conclusions and recommendations

ICOMOS notes the additional documentation provided by the State Party since its February 2024 Technical Review, including the submission of a revised Heritage Impact Assessment and related Environmental Statement materials. It further recognizes the efforts made by the project proponent to adjust the design of the Botley West Solar Farm in response to earlier concerns, including reductions in development area and revised layout to avoid key view corridors.

ICOMOS considers that the revised Heritage Impact Assessment continues to fall short of the standards set out in the 2022 *Guidance and Toolkit for Impact Assessments in a World Heritage Context*. While the Heritage Impact Assessment presents a structured analysis, it remains narrowly focused on visual impacts and does not demonstrate a sufficient understanding of how the wider setting of Blenheim Palace supports the Outstanding Universal Value of the property. The reliance on predefined attributes from the Management Plan - without undertaking a thorough and independent identification of attributes as advised - limits the depth of the impact assessment.

Crucially, the Heritage Impact Assessment does not explore the wider setting in terms of land use, spatial organization, approach routes, or cultural associations. The continued absence of a Landscape Character Assessment, as recommended by ICOMOS, represents a major methodological omission. Additionally, the assessment fails to address cumulative impacts of development in the area or consider alternatives to minimize potential harm.

The project must be seen in the context of mounting development pressures around the World Heritage property, as previously outlined in the ICOMOS February 2024 Technical Review on urban expansion. Together, these pressures—urban expansion and the Botley West Solar Farm—constitute a substantial threat to the landscape character and spatial context that support the property's Outstanding Universal Value.

ICOMOS does not consider that removing the areas marked 2.1, 2.2, 2.5, and 2.20-2.26 from the development is sufficient to reduce the substantial harm this project will have on the Outstanding Universal Value of the property.

In light of the above, ICOMOS concludes that the proposed development, its current form, individually and through cumulation with other proposals in the wider setting of the property, presents a significant adverse impact on the Outstanding Universal Value of Blenheim Palace through a cumulative transformation of its wider rural setting.

ICOMOS therefore recommends that the State Party:

- Commission a Landscape Character Assessment focused specifically on the way in which the wider setting supports the Outstanding Universal Value of Blenheim Palace;

- Require a revised and enhanced Heritage Impact Assessment for the Botley West Solar Farm that independently defines attributes of the Outstanding Universal Value, addresses the full range of experiential and cultural dimensions of setting, and integrates the findings of the Landscape Character Assessment;
- Undertake a cumulative impact assessment that considers the Botley West Solar Farm alongside other approved or proposed developments in the setting, including recent and planned urban expansions;
- Assess the current planning and management system for the property's setting, including the adequacy of policy protections in the absence of a buffer zone, and consider introducing additional safeguards.

ICOMOS also recommends that no further decisions on the approval or implementation of the project be taken on the Botley West Solar Farm until the above measures are completed and reviewed, specifically the cumulative impact assessment. The current trajectory of landscape change in the immediate and wider setting of Blenheim Palace suggests a need for a more coordinated and heritage-led response to spatial planning. Without this, the risk to the integrity and authenticity of the property's Outstanding Universal Value will increase.

ICOMOS remains available to the State Party to provide further guidance and support in developing a revised scheme that meets the climate and energy goals of the State Party while safeguarding the Outstanding Universal Value of the Blenheim Palace World Heritage property.

ICOMOS, Charenton-le-Pont
August 2025

Annexes

Annex A: ICOMOS Technical Review of the Botley West Solar Farm project (dated February 2024)

Annex B: ICOMOS Technical Review of four proposed and partially approved urban development projects in the setting of the Blenheim Palace World Heritage property (dated February 2024)

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Criterion	(ii)(iv)
Project	Botley West Solar Farm

I. Background

On 13 October 2023, the State Party of the United Kingdom of Great Britain and Northern Ireland submitted a notification to the World Heritage Centre with regards the proposed development of a solar farm in the wider setting of the World Heritage property Blenheim Palace. This notification was submitted in response to a Paragraph 174¹ request for information sent to the State Party by the World Heritage Centre on 21 July 2023, following the receipt of third-party information on the new solar farm being proposed by Photo-volt Development Partners (PVDP) in the west of Oxfordshire.

The State Party submission outlines that the proposal:

- Is categorised as a ‘Nationally Significant Infrastructure Project (NSIP)’. The 2008 Planning Act consequently mandates that the Secretary of State for the Department for Energy Security and Net Zero determine a ‘Development Consent Order (DCO)’,
- Will cover roughly 1400 ha of which 1000 ha will be covered by solar panels; the remainder being utilised to accommodate mitigatory measures,
- Is being developed collaboratively between Photovoltaic Development Partners (PVDP) in partnership with local landowners, including the Blenheim Estate.
- The proposal has progressed through the pre-application phase, and the State Secretary has adopted a completed scoping report for the project, which includes scoping of impacts on heritage.
- A Point of Connection (POC) agreement between the developer and the State Party’s National Grid utility company was signed in June 2021, creating the required conditions to connect the solar farm to the national electrical grid.

The State Party, in its letter, indicates that it intends to request that ICOMOS undertake a technical review of the project, specifically noting that it had awaited the completion of a Preliminary Environmental Information Report (PEIR) for the project before making this request.

In a subsequent Paragraph 172¹ notification, dated 21 December 2023, the State Party:

- Submitted further detailed material and studies including a Preliminary Environmental Information report, which includes a chapter on the Historic Environment and a stand-alone *Preliminary Screening/Assessment of Impacts upon the Blenheim Palace World Heritage Site* (hereafter *initial standalone HIA*),
- Noted that Historic England, in its review of the preliminary standalone HIA advised that the study would benefit from more work,

¹ Paragraphs of the *Operational Guidelines for the Implementation of the World Heritage Convention (2023)*.

- Indicated that the second round of public consultation would run until 8 February 2024 and that a formal application to the Planning Inspectorate is expected in the third quarter of 2024,
- Indicated that it would welcome comments on the proposed scheme.

Refer to Annex 1 for a list of material submitted by the State Party.

II. The Blenheim Palace World Heritage property

Blenheim Palace was inscribed on the World Heritage List in 1987, in Decision 11 COM VII.A on the basis of its meeting criteria (ii) and (iv).

The World Heritage Committee in 2008 adopted a Statement of Significance for the property in its Decision 32 COM 8B.95, and subsequently in 2013, a Retrospective Statement of Outstanding Universal Value in Decision 37 COM 8E.

The World Heritage Committee in 2024 adopted a proposal from the State Party for the clarification of the property's boundaries (Decision 45 COM 8D).

The Retrospective Statement of Outstanding Universal Value for Blenheim Palace World Heritage property is available at: [REDACTED]

III. Brief synthesis

Blenheim Palace, in Oxfordshire, was designed by John Vanbrugh. The English nation presented the site to John Churchill, first Duke of Marlborough, in recognition of his victory in 1704 over French and Bavarian troops, a victory which decided the future of the Empire and, in doing so, made him a figure of international importance. The Palace sits within a large walled landscape park, the structure by Vanbrugh overlaid by the designs of Lancelot "Capability" Brown from 1761 onwards.

The design and building of the Palace between 1705 and 1722 represented the beginning of a new style of architecture and its landscaped Park, designed by Lancelot "Capability" Brown, is considered "a naturalistic Versailles".

In tangible form, Blenheim is an outstanding example of the work of John Vanbrugh and Nicholas Hawksmoor, two of England's most notable architects. It represents a unique architectural achievement celebrating the triumph of the English armies over the French, and the Palace and its associated Park have exerted great influence on the English Romantic movement which was characterised by the eclecticism of its inspiration, its return to natural sources and its love of nature.

The original landscape set out by John Vanbrugh, who regulated the course of the River Glyme, was later modified by Lancelot "Capability" Brown who created two lakes, seen as one of the greatest examples of naturalistic landscape design.

Blenheim Palace was built by the nation to honour one of its heroes John Churchill, the first Duke of Marlborough, and is also closely associated with Sir Winston Churchill.

The justification of the application of criteria (ii) and (iv) is:

Criterion	Justification
<i>(ii): exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;</i>	<i>By their refusal of the French models of classicism, the Palace and Park illustrate the beginnings of the English Romantic movement, which was characterised by the eclecticism of its inspiration, its return to national sources and its love of nature. The influence of Blenheim on the architecture and organisation of space in the 18th and 19th centuries was greatly felt both in England and abroad.</i>
<i>(iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;</i>	<p><i>Built by the nation to honour one of its heroes, Blenheim is, above all, the home of an English aristocrat, the 1st Duke of Marlborough, who was also Prince of the Germanic Holy Roman Empire, as we are reminded in the decoration of the Great Drawing Room [the Saloon] by Louis Laguerre (1719-20).</i></p> <p><i>Like the World Heritage properties Residence of Würzburg and the Castles of Augustusburg and Falkenlust in Brühl, Blenheim is typical of 18th century European princely residences.</i></p>

The property boundary follows the 18th century dry stone wall which defines the extent of the park. The property has no defined buffer zone.

IV. The relationship between the Blenheim Palace World Heritage property and the Botley West Solar Farm

The proposed Botley West Solar Farm is planned as three components: The most northerly runs north-south, north of Wooton to north of Woodstock towards the east of the Blenheim Palace World Heritage property. The northern site lies approximately 1km north to the north of the Blenheim Palace World Heritage property. The middle component is projected east and south of the Blenheim Palace World Heritage property between the villages of Begbrook to the east, Church Hanborough in the west and Cassington to the south. The most southernly component is planned north of the village Cumnor.

The proposal is most proximate to the property at its southern end, just beyond Bladon Village, approximately 500m from the boundary. The area of the Blenheim Palace World Heritage property is therefore not included in the area planned for solar panels. The developer's leaflet '*Botley West Solar Farm Phase Two Community Consultation Leaflet November 2023*' indicates that: '*Buffer zones around Bladon have been increased to mitigate against potential landscape and visual impacts.*'

The proposal is, however, located in the setting of the property: a predominantly rural environment that consists of woodland, punctuated by villages. The project will include approximately 110km length of fences at 2,1m height, the installation of – mostly subsurface – power cables and the construction of substations etc. The project does propose the planting and management of grassland, hedgerows, trees and areas of scrub to support the extant landscape character.

The Statement of Integrity for the property, notes that: *The integrity of the property is well protected by its enclosing wall but important visual links do exist between the gates, the parkland buildings, buildings in the surrounding villages and landscape, and care needs to be taken to ensure these key visual links are protected.*

The Statement on Protection and management requirements indicates that the Maintenance of the setting of the property is of importance to the maintenance of its Outstanding Universal Value: *Government guidance on protecting the Historic Environment and World Heritage is set out in the National Planning Policy Framework and Circular 07/09. Policies to protect, promote, conserve and enhance World Heritage properties, their settings and buffer zones are also found in statutory planning documents.*

It also indicates that: *Firm implementation of existing policies is important to provide effective protection of the setting of the World Heritage property and it will be important to ensure that the management of the Park prioritises conservation of the elements of the landscape that reflect the work of Vanbrugh and Brown.*

This concern with the setting of the property resonates with the provisions of the *Operational Guidelines*¹, which indicate that with regard the authenticity of the property that: [Par. 82] *Depending on the type of cultural heritage, and its cultural context, properties may be understood to meet the conditions of authenticity if their cultural values (as recognized in the nomination criteria proposed) are truthfully and credibly expressed through a variety of attributes including: ...location and setting... spirit and feeling and other internal and external factors.*

Par. 112 provides further guidance on the contribution of the setting of a property to the maintenance of Outstanding Universal Value: *Effective management involves a cycle of short, medium and long-term actions to protect, conserve and present the nominated property. An integrated approach to planning and management is essential to guide the evolution of properties over time and to ensure maintenance of all aspects of their Outstanding Universal Value. This approach goes beyond the property to include any buffer zone(s), as well as the wider setting. The wider setting may relate to the property's topography, natural and built environment, and other elements such as infrastructure, land use patterns, spatial organization, and visual relationships. It may also include related social and cultural practices, economic processes and other intangible dimensions of heritage such as perceptions and associations. Management of the wider setting is related to its role in supporting the Outstanding Universal Value. Its effective management may also contribute to sustainable development, through harnessing the reciprocal benefits for heritage and society.*

Finally, Par. 118bis, taking cognisance of the importance of the wider setting of a property to the maintenance of its OUV mandates Impact Assessments for development projects and activities that are planned or implemented within or around a World Heritage property, including its wider setting. The guidance further notes that such assessments should: *serve to identify development alternatives, as well as both potential positive and negative impacts on the Outstanding Universal Value of the property and to recommend mitigation measures against degradation or other negative impacts on the cultural or natural heritage within the property or its wider setting.*

Seeing the large change in landscape character of the wider setting of the World Heritage property that the Botley West Solar Farm proposal would lead to, if implemented, the proposal will have an impact on the wider setting of the property, and that this should be assessed before any decisions on its implementation are made.

Concurrently, the proposal aims to reduce the State Party's reliance on carbon-emitting energy sources. The Botley West Solar Farm is presented to deliver 840 Megawatts (MW) of power and contribute to Oxfordshire's Energy Strategy and transition to net-zero. The updated *UNESCO policy document on Climate Action for World Heritage*, adopted by the General Assembly of States Parties at its 24th session (UNESCO, 2023) in Resolution 24 GA 8, acknowledges that: *Climate change has become one of the most significant threats to World Heritage, impacting the Outstanding Universal Values*

(OUV), including integrity and authenticity, of many properties, as well as the economic and social development and quality of life of communities connected with World Heritage properties.²

The development of carbon-neutral energy sources is one strategy to limit human-induced climate change. The *Policy document on Climate Action for World Heritage* notes that: *In the context of the World Heritage Convention, transformative change would be exemplified by decisions that contribute towards making World Heritage properties carbon neutral, as much as possible, and more resilient and better adapted to a changing climate, while safeguarding their Outstanding Universal Value. By acting as exemplars of climate action, World Heritage properties may serve as catalysts for change in the wider policy, economic, environment and social sectors for the benefit of present and future generations...*³

From the above it is deduced that:

- The Botley West Solar Farm proposal will affect the wider setting of the Blenheim Palace World Heritage property, and therefore may have an impact on the maintenance of its Outstanding Universal Value,
- The proposal should be assessed through an iterative Impact Assessment, that identifies development alternatives and mitigation measures to avoid negative impacts and ensure the maintenance of the Outstanding Universal Value of the property,
- The objectives of positive contributions to reductions in carbon emissions of the Botley West Solar Farm should be achieved while safeguarding the Outstanding Universal Value of the Blenheim Palace World Heritage property.

V. Development context

The Botley West Solar Farm project is proposed in a development context where multiple applications for housing have been brought forward in the wider setting of the property. Some of these have been approved, such as east of Woodstock, while others have been submitted to the World Heritage Centre for review through Par. 172 notifications.

These projects, along with the Botley West Solar Farm project, presenting a potential large-scale conversion of the landscape character within which the property lies, if all are implemented, will result in a significant cumulative change in the wider setting of the property. The character of the setting, including what is passed through in the approach to the Park and Palace is important to the maintenance of the OUV of the property.

VI. The Scoping Report, PEIR and preliminary standalone HIA

The State Party process has included:

- A scoping report on the proposal, on which comment was requested from local Authorities and English Heritage,
- Excerpts from the Preliminary Environmental Information Report (PEIR), which includes a preliminary Heritage Impact Assessment of the proposal.

The applicant has, in response to comments made by Historic England on the Scoping Report, commissioned a separate stand-alone *Preliminary Screening/Assessment of Impacts upon the Blenheim Palace World Heritage Site* specifically focussed on the Blenheim Palace World Heritage property, following the method recommended in the 2022 *Guidance and Toolkit for Impact Assessment in a World Heritage Context*. This is appended to the PEIR report.

² UNESCO (2021) *Draft policy document on Climate Action for World Heritage*, p. 1.

³ Ibid, p. 2.

According to the EIA Scoping Report,⁴ the project is planned for implementation starting 2025-2027 and for operation from 2027-2067, following which all above-ground infrastructure is planned to be removed. Chapter 7 of the EIA Scoping report is of interest, specifically sections 7.1 'Historic environment' and 7.2 'Landscape and Visual Resources'. It is notable that the Section 7.1 'Historic environment' reporting on the Legislative and Policy Context⁵ does not include the 1972 *World Heritage Convention*⁶ and the commitment of signatory States Parties to the Convention to: ensure: *...the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage referred to in Articles 1 and 2 and situated on its territory...* 'and that it will: *'do all it can to this end, to the utmost of its own resources and, where appropriate, with any international assistance and co-operation, in particular, financial, artistic, scientific and technical, which it may be able to obtain.'*⁷

Section 7.1 'Historic environment' also does not mention the *Operational Guidelines*, though it does refer to the 2022 *Guidance and Toolkit for Impact Assessments in a World Heritage context*. Its description of the Blenheim Palace World Heritage property in the Baseline Assessment refers only to the property – not to its Outstanding Universal Value nor to the potential importance of the setting of the property. The baseline assessment does however propose that a historic environment desk-based assessment baseline study be conducted to: *'... identify designated heritage assets whose significance may be affected through changes in their settings resulting from the construction, operation and decommissioning of the Project'*⁸

Section 7.1 'Historic environment' also proposed to limit the area to be assessed for visual impacts on Heritage assets to 2km from the boundaries of the development area and identifies potential effects on the settings of designated heritage assets during construction, operation and decommissioning of the project.⁹ It is notable that the Scoping Report includes an *'Approach to Mitigation, Enhancement and Monitoring,'* which states that: *'Consideration will be given to any situation where the Project will lead to effects on the significance of heritage assets as a result of change within their settings. It may be possible that mitigation could be proposed that would eliminate or reduce any adverse effects.'*¹⁰

Section 7.2 'Landscape and Visual Resources' indicates the EIA will include the assessment of visual impacts based on an analysis of the Zone of Theoretical Visibility as well as the resultant change in landscape character that is expected due to the proposal. The 5km study area for the landscape and visual receptors will include the Blenheim Palace World Heritage property.¹¹

The Historic Environment chapter of the PEIR continues on from the Scoping Report and indicates that the proximity of the Blenheim Palace World Heritage property was identified as a constraining factor to the development of the project throughout the identification and selection of areas for solar development.¹² It also outlines the process towards the selection of areas for the solar farm development, effectively arguing that the process of land selection has shown that no other viable and available locations exist. In the section: *Need, National Planning Policy, and Alternatives Considered* it refers to the State Party's commitments to the Kyoto Protocol (1997), the United Nations Paris Agreement (COP21) and COP26, the UK Climate Change Act (2008, as amended) etc. It does not consider the State Party's commitments under the 1972 UNESCO World Heritage Convention.

⁴ Included as Chapter 4 of the *Preliminary Environmental Information Report*.

⁵ RPS, (2023), *Botley West Solar Farm Scoping Report June 2023*, p. 40

⁶ See: <https://whc.unesco.org/en/conventiontext/>

⁷ Article 4.

⁸ Ibid p. 37.

⁹ Ibid, P. 41

¹⁰ Ibid, p. 42.

¹¹ Ibid, p. 47.

¹² RPS (2023), *Botley West Solar Farm: Preliminary Environmental Information Report. Volume 1, Chapter 5: Need, National Planning Policy, and Alternatives Considered*, p. 13.

The PEIR Volume 1 Chapter 7 outlines the preliminary assessment of the impact of the proposed development on the Historic Environment. The Blenheim Palace World Heritage property is identified as a receptor with 'Very High' sensitivity; the 'Overall character of the historic landscape' is assessed as having a 'Generally low' sensitivity/ value.¹³

No development will take place within the property and the proponent has worked to avoid any direct visual impacts of the proposed development. These mitigatory measures are also reported to in the preliminary standalone HIA, which includes visualisations that show that the solar farm components will not be visible from within the property.

The PEIR, due to its assessment of the sensitivity rating of the larger historic landscape, finds the impact of the proposal on this receptor to be 'Up to Minor Adverse'.

The preliminary standalone HIA focusses on the property, provides a first identification of the attributes of the Outstanding Universal Value of the property. It also defines the setting of the property through reference to Appendix 3 on the Management Plan for the property.

The preliminary standalone HIA concludes that none of the attributes that contribute to the Outstanding Universal Value of the Blenheim Palace World Heritage property will undergo any change and that, consequently, the impact on all will be neutral.

VII. Discussion

The Blenheim Palace World Heritage property is of international significance, amongst others, as a historical designed landscape park, which is emblematic of the Arcadian landscape ideals associated with the English Romantic movement. The Arcadian Landscape presents an idealisation of a bucolic pastoral landscape. As such, landscape parks like that at Blenheim should not be seen in isolation but rather as inextricably linked to the rural vestiges of its wider setting. This lineage goes beyond the visual, and includes, as defined in the *Operational Guidelines*, *topography, natural and built environment, and other elements such as infrastructure, land use patterns, spatial organization, and visual relationships*. It may also include related social and cultural practices, economic processes and other intangible dimensions of heritage such as perceptions and associations. Blenheim and the experience of Blenheim is linked to the Oxfordshire landscape.

ICOMOS therefore does not agree that the 'Overall character of the historic Landscape' can be typified as 'Generally Low'. Such a typification, made in the PEIR, cannot be supported when the landscape is seen as the setting of the Outstanding Universal Value of the Blenheim Palace World Heritage property. Consequently, ICOMOS considers that the assessment of the impact of the proposed solar development, which will transform for a period of at least 40 years of roughly 1000 ha of land and see the installation of 107km of 2,1 high fences on the wider setting of the OUV of the Blenheim Palace World Heritage property as 'Minor Adverse' to be inaccurate. ICOMOS considers that both the historical legibility of and the perception of the property may be dramatically altered by as significant a conversion of the predominantly rural wider setting of the property to effectively a semi-industrial landscape. ICOMOS also notes the concerning erosion of the landscape character of the immediate and wider settings of the property, which indicate a possible ineffective management and aligned uncoordinated planning.

VIII. Conclusions and recommendations

ICOMOS is appreciative of the amount of in-depth research undertaken in preparation of the assessment of impacts of the Botley West Solar Farm project. It also acknowledges and supports the

¹³ RPS (2023), *Botley West Solar Farm: Preliminary Environmental Information Report. Volume 1, Chapter 7: Historic Environment*, p. 28.

State Party's international commitments and ambitions to achieving net-zero, including through a transition away from carbon-emitting energy production. Solar energy development offers one pathway in this direction. At the same time ICOMOS is cognisant of the State Party's commitment to the maintenance and transmission of the Outstanding Universal Value of the World Heritage properties, including that presented by the Blenheim Palace World Heritage property, under the 1972 World Heritage Convention.

The preventative steps undertaken by the project proponent to ensure that the project will not have any direct visual impact on the World Heritage property are appropriate and commendable. These actions however do not eliminate all potential impacts on the World Heritage property. ICOMOS considers that the possible impact of the project on the setting of the property has not been fully investigated. ICOMOS also assess that the PEIR seems not to have taken sufficient note of the State Party's international obligations under the 1972 World Heritage Convention in assessing the proposed development.

ICOMOS therefore advises that the PEIR remains limited in its consideration of the Outstanding Universal Value of the property including the contribution of the wider setting of the property to its Outstanding Universal Value. This is an aspect that should be further explored.

ICOMOS also notes that Historic England has advised that the preliminary standalone HIA should be further developed. ICOMOS concurs with this assessment. ICOMOS advises that such a further development should focus on:

- The revision and more thorough inventory of the attributes that contribute to the Outstanding Universal Value, as this is very underdeveloped in the November 2023 version of this document,
- A further development of the relationship between property and its setting, including its wider setting, that explores the linkages between property and (wider) setting beyond only direct visual relationships, but also establishes how the wider setting supports the maintenance, legibility and experience of the property from the perspective of land use, spatial organization, social and cultural practices, perceptions and associations,
- The fact that the property has no defined buffer zone to provide an additional layer of protection to the property,
- The setting and wider setting are under threat from diverse development proposals, meaning the cumulative impacts should be carefully considered.

To achieve the above, ICOMOS additionally advises that:

- The proponent of the development commission a Landscape Character Assessment, specifically focussed on the relationship between the wider setting of the property and its Outstanding Universal Value as a baseline assessment from which a further assessment of the impact on the Outstanding Universal Value of the property can be further developed. Such a Landscape Character Assessment should:
 - Be undertaken as a foundational study to allow for the further development of the HIA, noted above,
 - Assess the efficacy of the management of the immediate and wider setting in maintaining the landscape character of the immediate and wider setting of the property, and
 - Clearly explore the importance of the wider setting, also in the understanding of the immediate setting and wider setting as what is passed through in the approach to the Park and Palace that cumulatively may have a large negative impact on the Outstanding Universal Value of the property.

In conclusion, ICOMOS, based on the material at its disposal, advises that it considers that the proposal will likely have an adverse impact on the Outstanding Universal Value of the World Heritage property

and advises that the proponent consider alternative locations for this development to avoid these negative impacts on the Blenheim Palace World Heritage property.

ICOMOS also expresses its concern at the level of development pressure on the immediate setting and wider setting of the property, specifically in this context where the property has no buffer zone defined to provide it with an extra layer of protection. The continued erosion of the landscape character of the immediate and wider settings pose an imminent danger of erosion on the contribution of the setting of the property to its Outstanding Universal Value.

Should the proponent wish to continue to consider the project, ICOMOS recommends that the State Party submit further developed iterations of the PEIR, the proposed Landscape Character Assessment and the preliminary standalone HIA for review before any further decisions are made on the future implementation of the project.

ICOMOS remains at the disposal of the State Party for further clarification on the above or assistance as required.

ICOMOS, Charenton-le-Pont
February 2024

Annex 1: List of material submitted by the State Party

- Non-Technical Summary;
- Chapter 1: Introduction and associated figures;
- Chapter 2: Existing Baseline and associated figures;
- Chapter 4: Approach to Environmental Assessment and associated appendix;
- Chapter 5: Need, National Planning Policy, and Alternatives Considered;
- Chapter 6: Project Description;
- Chapter 7: Historic Environment and associated figures and appendices

(including initial HIA);

- Chapter 8: Landscape and Visual Impact Assessment and associated figures

and appendices;

- Chapter 14: Climate Change and associated appendix;
- Chapter 19: Cumulative Developments and associated figures;
- Chapter 20: Summary of Significant Effects;
- Concept Plans;
- Illustrative Masterplan;
- Site Location Plan.

ICOMOS Technical Review

Property	Blenheim Palace
State Party	United Kingdom of Great Britain and Northern Ireland
Property ID	425
Date of Inscription	1987
Criterion	(ii)(iv)
Project	Urban Expansion in setting of the property

I. Background

On 18 July 2022, the State Party of the United Kingdom of Great Britain and Northern Ireland submitted a notification to the World Heritage Centre with regards four proposed urban expansion developments around the village of Woodstock, located in the setting of the World Heritage property Blenheim Palace. This notification was submitted in response to a Paragraph 174¹ request for information sent to the State Party by the World Heritage Centre on 16 May 2022, following the receipt of third-party information regarding development within the setting of the World Heritage property.

The State Party submission provided information on development proposals for:

- Land East of Woodstock, Oxford Road, Woodstock: a development including 300 new houses, already approved and under construction at the time of the State Party's submission;
- Land East of Park View, Woodstock: a development including 500 new houses then at the pre-planning application phase;
- Land North of Banbury Road, Woodstock: a development for up to 250 new houses for which the application had not been determined at that time;
- Land East of Hill Rise: a development 180 new houses for which the application had not been determined at that time;

All these applications are being brought forward by the Blenheim Estate.

In its letter, the State Party indicates that: *At the current time, given the status of these schemes and on the basis of Historic England's view of their impact we do not consider any requirement for the specific input of the Advisory Bodies in the form of a Technical Review.*

On 7 September 2022, the State Party submitted a second notification with additional information on the proposed development referred to in its 18 July submission Land East of Park View, renamed as Land South of Perdiswell Farm. In this letter the State Party indicates that Historic England had expressed reservations at the pre-planning stage due to the presence of a scheduled monument, the remains of a Roman villa. At the same time the State Party notes that a condition of any planning permission granted: *a legally binding mechanism would be put in place to secure a contribution of relevant proceeds from the development to the conservation, maintenance and restoration of the Blenheim Palace WHS.*

In this second letter the State Party indicates that the added information was provided to assist the World Heritage Centre in further reviewing the third-party information received by the World Heritage Centre.

¹ Paragraphs of the *Operational Guidelines for the Implementation of the World Heritage Convention* (2023).

II. The Blenheim Palace World Heritage property

Blenheim Palace was inscribed on the World Heritage List in 1987, in Decision 11 COM VII.A on the basis of its meeting criteria (ii) and (iv).

The World Heritage Committee in 2008 adopted a Statement of Significance for the property in its Decision 32 COM 8B.95, and subsequently in 2013, a Retrospective Statement of Outstanding Universal Value in Decision 37 COM 8E.

The World Heritage Committee in 2024 adopted a proposal from the State Party for the clarification of the property's boundaries (Decision 45 COM 8D).

The Retrospective Statement of Outstanding Universal Value for Blenheim Palace World Heritage property is available at: <https://whc.unesco.org/en/list/425/>.

Brief synthesis

Blenheim Palace, in Oxfordshire, was designed by John Vanbrugh. The English nation presented the site to John Churchill, first Duke of Marlborough, in recognition of his victory in 1704 over French and Bavarian troops, a victory which decided the future of the Empire and, in doing so, made him a figure of international importance. The Palace sits within a large walled landscape park, the structure by Vanbrugh overlaid by the designs of Lancelot "Capability" Brown from 1761 onwards.

The design and building of the Palace between 1705 and 1722 represented the beginning of a new style of architecture and its landscaped Park, designed by Lancelot "Capability" Brown, is considered "a naturalistic Versailles".

In tangible form, Blenheim is an outstanding example of the work of John Vanbrugh and Nicholas Hawksmoor, two of England's most notable architects. It represents a unique architectural achievement celebrating the triumph of the English armies over the French, and the Palace and its associated Park have exerted great influence on the English Romantic movement which was characterised by the eclecticism of its inspiration, its return to natural sources and its love of nature.

The original landscape set out by John Vanbrugh, who regulated the course of the River Glyme, was later modified by Lancelot "Capability" Brown who created two lakes, seen as one of the greatest examples of naturalistic landscape design.

Blenheim Palace was built by the nation to honour one of its heroes John Churchill, the first Duke of Marlborough, and is also closely associated with Sir Winston Churchill.

The justification of the application of criteria (ii) and (iv) is:

Criterion	Justification
<i>(ii): exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;</i>	<i>By their refusal of the French models of classicism, the Palace and Park illustrate the beginnings of the English Romantic movement, which was characterised by the eclecticism of its inspiration, its return to national sources and its love of nature. The influence of Blenheim on the architecture and organisation of space in the 18th and 19th centuries was greatly felt both in England and abroad.</i>

<i>(iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;</i>	<p><i>Built by the nation to honour one of its heroes, Blenheim is, above all, the home of an English aristocrat, the 1st Duke of Marlborough, who was also Prince of the Germanic Holy Roman Empire, as we are reminded in the decoration of the Great Drawing Room [the Saloon] by Louis Laguerre (1719-20).</i></p> <p><i>Like the World Heritage properties Residence of Würzburg and the Castles of Augustsburg and Falkenlust in Brühl, Blenheim is typical of 18th century European princely residences.</i></p>
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The property boundary follows the 18th century dry stone wall which defines the extent of the park. The property has no defined buffer zone. The 2017 Management Plan for the property states that due to *strong legal policies, conservation designation and the spatial planning system established in the UK²*, the property does not require a buffer zone to supply it with the added layer of protection necessitated for the adequate protection of the nominated property.³

III. Current status of the four project proposals

The West Oxford and Cherwell district council online portals⁴ provide up to date information of the status of the applications. As noted above the project Land East of Woodstock, Oxford Road, Woodstock had already been approved⁵ and open access aerial photographs⁶ indicate that a first phase of the project adjacent to Oxford Road is completed while a further phase to the north-east towards Shipton Road is under construction.

At the time of writing the status of the three other projects is:

Project name	Application no and type	Status and weblink
Land South of Perdiswell Farm Shipton Road Shipton On Cherwell	21/04187/SCOP (Scoping option)	Withdrawn (https://planningregister.cherwell.gov.uk/Planning/Display/21/04187/SCOP)
Land North of Banbury Road	21/00217/OUT (Outline planning permission)	Awaiting decision (Application expiry date was Mon 21 Nov 2022; https://publicaccess.westoxon.gov.uk/online-applications/applicationDetails.do?activeTab=dates&keyVal=QNA87SRK01000)
Land East of Hill Rise	21/00189/FUL (Hybrid planning application)	Initially refused but allowed on appeal. First phase of 48 dwellings given full planning approval; remaining phases (including 132 dwellings) given outline planning approval.

² Historic Landscape Management (2006) *Blenheim Palace World Heritage Site and National Heritage Management Plan*, p. 8.

³ Refer to Par. 104 of the *Operational Guidelines for the Implementation of the World Heritage Convention* (2023).

⁴ <https://www.westoxon.gov.uk/planning-and-building/planning-permission/view-planning-applications/> and <https://planningregister.cherwell.gov.uk>.

⁵ Decision date: Mon 21 May 2018 <https://publicaccess.westoxon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=O66MVWRK01C00>.

⁶ Google Maps. Imagery (a) 2024 CNES / Airbus Getmapping plc, [REDACTED]

		(https://publicaccess.westoxon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=QN6JV6RK01000) .
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The parcels of land for the Land East of Woodstock and the Land East of Hill Rise projects are separated from the boundary of the World Heritage property by the A44 (Oxford Road and Manor Road).

The map of the property and its boundary submitted by the State Party to the World Heritage Centre and adopted by the World Heritage Committee in [Decision 45 COM 8D](#) (2023), includes an outline of phase 1 and some indications of other phases for the Land East of Woodstock project.

IV. Blenheim Palace World Heritage property and its setting

The granted, proposed and withdrawn developments all fall within the immediate and wider setting of the Blenheim Palace World Heritage property.

The *Operational Guidelines for the Implementation of the World Heritage Convention*¹ which provide guidance on the contribution of the setting of the property to the maintenance of its Outstanding Universal Value [Par. 82] indicates that: *Depending on the type of cultural heritage, and its cultural context, properties may be understood to meet the conditions of authenticity if their cultural values (as recognized in the nomination criteria proposed) are truthfully and credibly expressed through a variety of attributes including: ...location and setting... spirit and feeling and other internal and external factors.*

Par. 112 provides further guidance on the contribution of the setting of a property to the maintenance of Outstanding Universal Value: *Effective management involves a cycle of short, medium and long-term actions to protect, conserve and present the nominated property. An integrated approach to planning and management is essential to guide the evolution of properties over time and to ensure maintenance of all aspects of their Outstanding Universal Value. This approach goes beyond the property to include any buffer zone(s), as well as the wider setting. The wider setting may relate to the property's topography, natural and built environment, and other elements such as infrastructure, land use patterns, spatial organization, and visual relationships. It may also include related social and cultural practices, economic processes and other intangible dimensions of heritage such as perceptions and associations. Management of the wider setting is related to its role in supporting the Outstanding Universal Value. Its effective management may also contribute to sustainable development, through harnessing the reciprocal benefits for heritage and society.*

Finally, Par. 118bis, taking cognisance of the importance of the wider setting of a property to the maintenance of its Outstanding Universal Value, mandates Impact Assessments for development projects and activities that are planned or implemented within or around a World Heritage property, including its wider setting. The guidance further notes that such assessments should: *serve to identify development alternatives, as well as both potential positive and negative impacts on the Outstanding Universal Value of the property and to recommend mitigation measures against degradation or other negative impacts on the cultural or natural heritage within the property or its wider setting.*

The Statement of Integrity for the property notes that: *The integrity of the property is well protected by its enclosing wall but important visual links do exist between the gates, the parkland buildings, buildings in the surrounding villages and landscape, and care needs to be taken to ensure these key visual links are protected.*

The Statement on Protection and management requirements indicates that the Maintenance of the setting of the property is of importance to the maintenance of its Outstanding Universal Value: *Government guidance on protecting the Historic Environment and World Heritage is set out in the*

National Planning Policy Framework and Circular 07/09. Policies to protect, promote, conserve and enhance World Heritage properties, their settings and buffer zones are also found in statutory planning documents.

It also indicates that: *Firm implementation of existing policies is important to provide effective protection of the setting of the World Heritage property and it will be important to ensure that the management of the Park prioritises conservation of the elements of the landscape that reflect the work of Vanbrugh and Brown.*

The 2014 Management Plan for the property takes cognisance of the contribution of the setting of the visual experience of the property from within the property. Its Annex III is a study of the setting of the property and aims to: *interpret what is meant by ‘the setting’ of the Blenheim World Heritage Site and to offer guidance on the ways in which it contributes to the Outstanding Universal Value (OUV) of the site.*¹² The study also indicates that it is intended as informant and not intended to serve as *a means of preventing appropriate [sic] development in the land surrounding Blenheim Park but to help reveal potential impacts and inform decisions on appropriate actions and mitigations.*¹³

The Setting Study notes that the park is mostly contained within its walls, that due to its scale, the designed views are mainly contained within the tree boundary, with the exception of the view from the base of the Column of Victory over the village of Woodstock and the views from the Palace towards the south-east, which focusses on the tower of the Bladon Church. Views into the property are also identified. The study also identifies areas to the west of the park where recent felling of trees along the boundary have created a visual link between the park and its surroundings.

Apart from addressing views, the Setting Study also *identifies the ‘character of the setting as traditional English countryside, dotted with picturesque villages mainly built using a uniform palate of materials. ... These significances are important individually and together in achieving a strong sense of place, which helps foster a sense of community through pride in the WHS and connecting it with the local area.*¹⁴

The conclusions of the Setting Study are presented in a ‘Character of Setting’ map (Figure 5), which, over and above two view cones from the property outward, also includes woodlands and plantations and areas of high scenic value which contribute to the setting of the property.

The Setting Study notes as fundamental to the *...character of the setting as traditional English countryside, dotted with picturesque villages mainly built using a uniform palate of materials... These significances are important individually and together in achieving a strong sense of place, which helps foster a sense of community through pride in the WHS and connecting it with the local area.*¹⁵ This understanding relates both to the *setting* and the *spirit and feeling* referred to in Par. 82 of the *Operational Guidelines*.

The Setting Study therefore advises that managing the setting requires that: *The importance of these elements of the setting of Blenheim in reinforcing the OUV and in maintaining and enhancing local distinctiveness and the high quality environment, can perhaps best be understood by considering the implications of not protecting them:*

¹² Historic Landscape Management Ltd (2017). *Blenheim Palace World Heritage Site Revised Management Plan 2017: Appendix III : Setting Study*, p. 1. Available at: [REDACTED]

¹³ Ibid.

¹⁴ Ibid, p. 43

¹⁵ Ibid.

- *The conversion of significant areas of agricultural land for other purposes, or the large-scale loss of woodland would detract from the distinctiveness of the setting [...]*
- *Development that results in the joining of one village settlement to another could result in the settlements losing their distinctive nature.*¹⁶

The latter statement relates to one of the conclusions on the value of setting to Blenheim Palace and its wider communities as:

- *The importance of the village clusters, farmed countryside and woodlands/ trees in enhancing local distinctiveness and fostering a sense of place*¹⁷

In this context it is worth quoting from the Setting Study at length on the maintenance of the setting:

*... As a traditional landed estate, much of the land is retained in open agricultural and enclosed forestry use - another attribute which contributes to OUV. The grazed pastoral landscapes around the river valleys, along with the fields and woodlands are particularly significant as these reflect the land-use and character of the landscape that would have been appreciated during the 18th century. Contrasts between these features is muted and gentle, representing the historic character of the farmed landscape of middle England. The appropriate management and enhancement of these landscape features is therefore an important objective, and the areas which make a particular contribution to the setting of the WHS are highlighted on the accompanying map (Figure 5 from the WHS Management Plan). In terms of management, therefore, it would be helpful to encourage on-going management of the open elements of the landscape and river meadows through effective agricultural practices and appropriate grazing. The opportunities for other land management practices such as community woodlands, agri-environment schemes and community supported agriculture can also positively contribute to the appropriate care of the setting.*¹⁸

Few of these conclusions are found back in the main Management Plan, which includes three objectives for the setting of the property, being:

Objective 7: Maintain the park wall and perimeter plantations as the boundary to the World Heritage Site, and as the physical historic boundary to the park.

Objective 8: Ensure that Blenheim Palace is adequately protected from development that is incompatible with the unique status and character of the World Heritage Site and national heritage assets.

Objective 9: Maintain a high quality environment for Blenheim Palace by promoting the highest possible standards of design, materials and execution during restoration and renovation, new development, and alterations to existing buildings, that may impact on the World Heritage Site and its OUV - both within the WHS boundary and within the setting.

¹⁶ Ibid, p. 44.

¹⁷ Ibid, p. 9.

¹⁸ Ibid, p. 44.

*Objective 10: Ensure that appropriate policies to protect the World Heritage Site are included in the draft West Oxfordshire Local Plan 2031.*¹⁹

None of these objectives relate to the setting as *open agricultural and enclosed forestry use*. Objective 9 is questionable, as it seems to imply that negative impacts can be sufficiently mitigated by design, materials and execution. It refers to the 'Character of Setting' map (Figure 5), and notes that *the WHS at Blenheim Palace is enclosed by a park wall and boundary plantations which together create an obvious barrier of protection between the inside and the outside. The site is also surrounded by a patchwork of protective designation including an AONB and several conservation areas. Given firm implementation, the guidance provided in GPA3 together with the existing local planning policies which are already in place, provide effective protection to the setting of the Blenheim Palace and Park WHS.*²⁰

The conclusions presented in the Character of Setting' map (Figure 5), referred to in the Management Plan identify 'areas of high scenic value which contribute to the World Heritage Site but with no intervisibility beyond the park wall and boundary plantation's on only the south-east of the property. This is puzzling, especially as the Setting Study concludes of the area between Woodstock and Wootton – not included as 'area of high scenic value' on the map – that: *...any loss of the expanses of farmland would be detrimental.*

This is the general area in which the granted project 'Land East of Hill Rise' is located.

The same can be said for the areas of agricultural land north and north-east of Woodstock, of which the Setting Study concludes that: *Generally land use changes to the north and north-east - particularly loss of the water meadows would be detrimental to setting, and the management of the watercourse also directly affects the WHS itself.*²¹

This is the general area in which the granted project 'Land North of Banbury Road, Woodstock is located.

V. Discussion

ICOMOS agrees with the authors of the Setting Study that views are an important attribute of the Outstanding Universal Value of the property specifically as they were fundamental to the placement and design of the palace and landscape. ICOMOS also agrees with the conclusion that the property has a limited inter-visibility with its wider setting. However, reducing the setting of the property only to views inside the property and views outward from the property would underrepresent the contribution of the setting towards the maintenance of the Outstanding Universal Value of the property. This view is shared by the Setting Study, in its acknowledgement of the contribution of the landscape character of the setting study to the property's Outstanding Universal Value.

The two projects granted, the Land East of Woodstock and the Land East of Hill Rise are both located within the setting of the property, and both partially alongside its border.

The nature of the border between the Blenheim Park has now in these areas changed from a barrier between park and agricultural area to a barrier between park and urban area. This in itself is already a notable change: while the 'inside' remains the same, the nature of the 'outside' has been altered in

¹⁹ Historic Landscape Management (2006). *Blenheim Palace World Heritage Site and National Heritage Management Plan*, p. 65.

²⁰ Ibid.

²¹ Historic Landscape Management Ltd (2017). *Blenheim Palace World Heritage Site Revised Management Plan 2017: Appendix III : Setting Study*, p 40.

these two areas. It is acknowledged that the Land East of Hill Rise design sees the housing back from the road, but this does not alter this fundamental change. In both cases these developments along main roads leading into the property and towards Woodstock alter the 'spirit and feeling' of the property due to the enlarged urban area through which one now moves towards the property.

ICOMOS notes that the project for the Land North of Banbury Road has not been granted and the Land South of Perdiswell Farm Shipton Road Shipton On Cherwell has been withdrawn. However, the four projects taken together, had they all been granted, would have led to a significant erosion of the contribution of the setting to the property and ICOMOS advises that those that have not yet been granted or have been withdrawn not be taken forward.

When considering these four projects in the context of the large scale Botley West Solar Farm, which has recently been brought forward and in which the Blenheim Estate is engaged, ICOMOS concludes that a fundamental understanding of the contribution of the setting of the property to its Outstanding Universal Value is not shared across the board by all stakeholders in the management of the property and that the current protection and management system for the setting of the property is not adequate to withstand development pressures in its setting that may affect its Outstanding Universal Value.

One of the drivers for these developments seems to be the need to raise funds for maintenance of the property. The State Party notes in its Paragraph 174 letter to the World Heritage Centre of 7 September 2022 that for the project located at Land South of Perdiswell Farm (currently withdrawn) that: *any planning permission granted, a legally binding mechanism would be put in place to secure a contribution of relevant proceeds from the development to the conservation, maintenance and restoration of the Blenheim Palace WHS.* Such a mechanism constitutes offset of an erosion of Outstanding Universal Value against the maintenance of the property.

A similar motivation was put forward in 2016 for the granted application for the Land East of Woodstock project. The comment submitted by Historic England on the project dated 24 June 2016²⁴ outlines that Blenheim Estate had a maintenance funding shortfall, and that the proposal to develop this part of the Estate's land was, in part to contribute to an endowment for the Estate. In its advice Historic England concludes that the project will have a moderate to low harm in heritage terms, but that this is offset against the benefit of it providing funding for maintenance of the property.

The issue of offsetting harm for benefit when considering the Outstanding Universal Value of World Heritage properties is contentious. The 2022 *Guidance and Toolkit for Impact Assessment in a World Heritage Context* provides as guidance that: *Negative impacts on Outstanding Universal Value should always be avoided altogether, since the OUV of a World Heritage property is irreplaceable and damage to OUV is unacceptable.*²⁵ It goes further to add that, when considering mitigation of negative impacts that: *A 'mitigation hierarchy' is often used in impact assessment, ranging from the preferred 'avoidance', through 'minimize', 'rectify' and 'reduce' to 'offset'... However, in the case of World Heritage, OUV is irreplaceable and cannot be 'offset'.*²⁶

²⁴ Available publicly at <https://www.westoxon.gov.uk/planning-and-building/planning-permission/view-planning-applications/> Dossier no. No 16/01364/OUT. Historic England. *Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015 Land East of Woodstock Oxford Road Woodstock Oxfordshire Application No 16/01364/Out.* Ref P00509353.

²⁵ UNESCO, ICCROM, ICOMOS & IUCN, p.32. [original empyasis]

²⁶ Ibid, p. 45.

VI. Conclusions and recommendations

The Blenheim Palace World Heritage property is of international significance, amongst others, as a historical designed landscape park, which is emblematic of the Arcadian landscape ideals associated with the English Romantic movement. The Arcadian Landscape presents an idealisation of a bucolic pastoral landscape. As such, landscape parks like that at Blenheim should not be seen in isolation but rather as inextricably linked to the rural vestiges of its wider setting.

Despite being visually isolated from its immediate setting by the wall and plantations along its boundary, Blenheim and the experience of Blenheim is inextricably linked to the Oxfordshire cultural landscape.

ICOMOS is appreciative of the work that was undertaken in exploring the contribution of the setting of the property to its Outstanding Universal Value. It is considered unfortunate however that these conclusions have not been translated into the 2017 Management Plan for the property (ICOMOS has in a separate Technical Review provided comment on the Management Plan, specifically the definition of attributes, which would benefit from revision).

The fact that the Setting Study conclusions have not been implemented in policy means that the setting is vulnerable to inappropriate developments.

ICOMOS concludes that:

- The two granted development projects (Land East of Woodstock and Land East of Hill Rise) have already led to cumulative negative impacts on the Outstanding Universal Value of the property through an erosion of its setting,
- The two project that have not yet been decided (Land North of Banbury Road and the Land South of Perdiswell Farm Shipton Road Shipton On Cherwell) may further constitute an erosion of the setting of the Outstanding Universal Value of the property and these and other such projects should therefore not be granted until:
 - Further studies into the contribution of the setting of the property to the maintenance of its Outstanding Universal Value have been undertaken, and
 - Their impacts on the Outstanding Universal Value have been tested through independent Heritage Impact Assessments.

ICOMOS further considers that:

- The 2017 Management Plan for the property does not provide an adequate framework for preventing a further erosion of the Outstanding Universal Value through inappropriate changes in its setting in the context of the wider planning and policy context,
- Offsetting harm to the Outstanding Universal Value against potential benefits through the raising of funding for maintenance is not appropriate to World Heritage properties.

In general, a greater understanding and awareness of the contribution of the setting of the World Heritage property to its Outstanding Universal Value would benefit the maintenance and transmission of its Outstanding Universal Value.

To achieve the above, ICOMOS additionally advises that a Landscape Character Assessment, specifically focussed on the relationship between the wider setting of the property and its Outstanding Universal Value, be undertaken. Such a Landscape Character Assessment should take the 2017 Setting Study as a point of departure. Following the conclusions, a review of the Management Plan would be appropriate, specifically, but not limited to, ensuring that the maintenance of the setting of the property is given adequate priority.

ICOMOS also expresses its concern at the level of development pressure on the immediate setting and wider setting of the property specifically in this context where the property has no buffer zone defined to provide it with an extra layer of protection. The continued erosion of the landscape character of the

immediate and wider settings poses an imminent danger of erosion of the contribution of the setting of the property to its Outstanding Universal Value.

ICOMOS therefore concludes that it would also be appropriate for the State Party to assess the efficacy of the management of the immediate and wider setting in maintaining the landscape character of the immediate and wider setting of the property, especially in the absence of a defined buffer zone.

ICOMOS remains at the disposal of the State Party for further clarification on the above or assistance as required.

ICOMOS, Charenton-le-Pont
February 2024