

Mr David Wallis  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Our ref: PL00794649

Your ref: EN010147

Telephone: [REDACTED]

Date: 22 August 2025

Dear Mr Wallis,

### **Re Botley West Solar Farm DCO - Deadline 4 Submissions**

We wish to take this opportunity to briefly update your Examining Authority on Historic England's engagement up to this Deadline 4 and other relevant information we have received.

The Examining Authority have set out that the following submissions are required by Deadline 4.

- Responses to the Examining Authority's Second Written Questions
- Notification by Affected Persons of wish to speak at a Compulsory Acquisition Hearing
- Comments on the Applicant's draft ASI itinerary
- Comments on any other information and submissions received at Deadline 3
- Any further information request by the Examining Authority under Rule 17 of the Examination Procedure Rules.

#### Responses to the Examining Authority's Second Written Questions.

The second set of written questions (ExQ2) had three questions directed to Historic England. Please find our responses to those questions enclosed below.

#### Notification by Affected Persons of wish to speak at a Compulsory Acquisition Hearing

No comment from Historic England

#### Comments on the Applicant's draft ASI itinerary

No comment from Historic England

#### Comments on any other information and submissions received at Deadline 3

We have reviewed other interested parties' responses which were submitted and received at Deadline 3. We do not intend to engage in providing commentary on this documentation. Our absence of comment should however not be taken that we agree with the comments made.

Any further information request by the Examining Authority under Rule 17 of the Examination Procedure Rules.

In accordance with the programme set out in PD-011, Historic England has been consulted by the applicant on Change Request 2. This follows on from the Change Request 2 Notification (**REP2-045**) that was issued to your Examining Authority. We have responded to this consultation, and we will continue to engage with the applicant to ensure sufficient information is available so the implications of this Change Request can be understood and assessed.

Additional observation

The Department for Culture, Media and Sport (DCMS) in its role representing the UK State Party to the UNESCO 1972 World Heritage Convention has also received an updated Technical Review on the proposals from ICOMOS International (August 2025), via the World Heritage Centre. We understand that this document has been sent to you. We are in the process of reviewing this Technical Review and will provide further comments as necessary.

Yours sincerely,

Andrew Scott

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



**EXAMINING AUTHORITY'S SECOND 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 4 SUBMISSION: 22<sup>nd</sup> AUGUST 2025**

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**ExA Written Question – 2.6 Cultural Heritage**
**2.6.4 - Settings of historic towns**

**In Green Belt policy, one of the purposes of the Green Belt is to preserve the setting and special character of historic towns. Taking into account the applicant's potential proposed change request [REP2-045], do you consider there to be any continuing conflict with this purpose of the Green Belt?**

Historic England is aware that some of the assets we have commented on in our Written Submissions are located within the Green Belt. However, our focus has been on the contribution that setting may make to the significance of those heritage assets. We have not made any comment on the purposes of the Green Belt or the extent to which the setting and special character of historic towns would be preserved or otherwise by this proposal.

We understand that the Oxford Green Belt policy was designed to ensure Oxford's historic setting is maintained. We recognise the solar farm would sit within close proximity to some historic settlements within and close to the Green Belt and may change elements of their character. As noted above though, this is not an aspect which we have commented on in our written representations, as we have focused on the contribution setting may make to the specific heritage assets that we have commented on, rather than consider Green belt purposes.

With regards to the proposed change request, we understand that the proposed revision would provide a greater spatial buffer between the development site and the historic settlements of Bladon and Begbroke. We are currently awaiting the supporting evidence, including an updated Heritage Impact Assessment, Setting Assessment and revised visualisations to better understand the implications that this could have on the heritage assets that we have commented on.

**ExA Written Question – 2.6.7 Cumulative Impacts**

**At Issue Specific Hearing (ISH) 1 [EV5-004] the ExA asked whether you felt that, if taken together, the impact on multiple heritage assets could increase the overall level of harm of the project from less than substantial to substantial. Your response was that you only considered heritage assets individually.**

**Whilst it is appreciated that each case is determined on its merits, the ExA has experienced a different approach taken by Historic England (HE) to cumulative impacts on multiple heritage assets on other projects and would like you to expand on the reasons for not considering this in relation to this particular project.**

When considering the impact of a proposal on a heritage asset, the significance of that asset needs to be understood. That significance derives not only from its physical presence, but also from its setting (which may make a positive, negative or neutral contribution to the significance). Each asset needs to be considered individually, and a view reached as to the extent of impact the proposal might have on its significance. On occasion a number of assets affected by the proposal may be grouped together for the purposes of describing the impact upon them. Where this has been done, it does not mean that the assets have not been individually assessed. In reaching a conclusion about the impact of a proposal, it is important to ensure that the significance of each heritage asset affected has been taken into account, together with the impact of the proposal on that significance.

In this particular application, the proposal covers a wide landscape and large number of heritage assets, and there is potential for group value as a result of how they relate to each other. We would expect the applicant to have undertaken an assessment of all the appropriate heritage assets, irrespective of any group value that might arise. However, we have only commented on the applicant's approach in relation to the World Heritage Site and a select number of highly designated heritage assets.

Historic England's approach to cumulative change is set out in our publication 'The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3' (GPA3).

As set out in that document cumulative assessment focuses on the impact that multiple developments would have on the significance of a single heritage asset (page 4). This approach takes past change which may have compromised significance into account, alongside considering whether additional change will further detract from, or might enhance, that significance (page 4).

Cumulative impact assessment does not involve aggregating impacts, such as the impact of a single scheme on the significance of multiple different heritage assets.

We assessed the cumulative impact of how this development might impact the OUV of the WHS alongside the impact that other developments in the vicinity of the property have already had together with those that (if granted) might also result in a change within the WHS' setting. This assessment is set out in our Written Representations (**REP1-086**; paragraph 5.55). We considered the cumulative change that could affect the WHS within the setting of the property. We took into account the impact of other schemes consented since the WHS was inscribed, as well as currently proposed developments. Paragraph 6.3 of our Written Representations (**REP1-086**) further emphasises the need for the applicant's Heritage Impact Assessment to address the concerns raised in ICOMOS' initial Technical Review (March 2024) regarding 'the proposal's potential impact on the property's OUV due to the change within its setting including the cumulative impact in relation to applications for housing within Blenheim's setting.'

The State Party has received ICOMOS' updated Technical Review from the UNESCO World Heritage Centre and we are currently reviewing this document. We note this has referred to cumulative impacts and we will review and provide any relevant comments as soon as we are able.

#### **ExA Written Question – 2.6.19 Trial Trenching results, Sansom's Platt**

**It is noted that in their submission [REP2-056], HE is still concerned about the level of impact assessed and the potential for the area of nationally important archaeological remains to be greater than the area currently scheduled.**

**It is also noted in your response to EXQ1.6.45 [REP2-025] that the results of trial trenching will be available at DL5. However, in [CR1-003] you state that the trial trenching was commenced in August 2024. In their responses to EXQ1.6.35, both Oxford County Archaeology Service (OCAS) [REP2-050] and HE [REP2-056] have indicated that they are awaiting this important information in order to be able to more fully assess the potential impact on archaeological site. In addition, OHA second**

response to EXQ1.6.45 [REP3-072] notes concerns regarding the timing of this submission in relation to the Examination period.

- 1) Please explain the delay in getting these results published and, if possible, commit to submission at DL4 instead of DL5.
- 2) In the updated settings assessment [REP2-014] paragraph 1.9.7 alludes to some of the results being available. If it is not possible to bring the full submission forward, please provide a more detailed initial summary of results at DL4 and whether you consider they are likely to result in any changes to the proposed buffer zones.

The ExA appreciate that the conclusions in the ES Appendix 7.5 [REP2-014] have been made without the benefit of the trial trenching results and expect that this document will be updated following publication of the results to ensure that the effects are accurately reflected.

Historic England notes the question is directed to the Applicant. As set out in our Deadline 3 response (**REP3-081**; paragraphs 2.40 - 2.41) we were concerned by the proposed delay in receiving the report on the trial trenching until Deadline 5. We noted that “to properly inform decision making in respect of the Scheduled Monument Sansom’s Platt, we consider that the reports should be supplied to both the County Archaeologist and Historic England as soon as possible and ideally within a timeframe that is sufficient to allow consideration of their content and to enable further amendments, should these be required.” As soon as the report is available, we will review and provide any relevant comments as soon as we are able.

#### **ExA Written Question – 2.6.20 Sansom’s Platt protection**

In HE’s RR [RR-0398] it is indicated that the scheduled area is accepted to be the site of a Roman Settlement associated with Akeman Street and may extend beyond the existing scheduling boundary. In light of the trial trenching results possibly not being available until DL5 and given your existing knowledge of this and other similar sites, please provide a plan suggesting what you might consider to be a suitable buffer zone to protect the potential remains in this area.

No Roman settlement is exactly like any other, and it would be inappropriate to attempt to predict the form of the settlement at Sampson’s Platt based on comparison with other sites. We understand that evaluation trenching commenced last year. The amendments to the Vol 3, Appendix 7.5: Settings Assessment (**REP2-015**) make it clear that some results are now available from the trenching in the area around the scheduled monument as they indicate that there may be land used for ‘funerary purposes’ beyond the core area of the settlement.

In their Applicant’s Response to the ExA’s First Written Questions (**REP2-025**; Q1.6.45) the applicant acknowledges the need for early submission of these results. If these are only supplied by Deadline 5 time will be required to assess and review the results as to how this might impact on the scheduled monument and any potentially nationally important remains associated with the scheduled monument.

We note also the ExA question to the applicant at 2.6.19 requesting early submission of these results (as requested both by HE and OCAS), and we fully support this.