



Begbroke and Yarnton Green Belt Campaign (BYG)

Deadline 5, BYG Comment on Responses to Examining Authority's ExQ2 re: ICOMOS's August 2025 Technical Review of BWSF and its wider setting.

BYG welcomes the submission of the ICOMOS technical review ((**REP4-052**)) and fully supports its conclusions. The Review provides necessary technical consideration of the importance of the wider setting to the OUV of the WHS.

Our comment is on the Review's reference to the lack of a buffer zone and the resulting need for additional safeguards to be considered.

1. It was the Blenheim Trustees who themselves argued against the need for a buffer zone in their Blenheim Palace WHS Management Plan 2017. Their arguments, set out in the attached letter dated 9 May 2016, were accepted. The Trustees believed strongly in the existing protection, as shown in this extract from page 3 of that letter.

'The concept of a Buffer Zone and setting will be part of the WHS management plan review and the Estate will not pre-empt the recommendations and conclusions of that review. However, given the strong statutory and local plan protections for heritage assets, the Oxford Green Belt and natural environment features such as the Cotswold AONB coupled with the fact that the local authorities have recently produced, or are in the process of producing, new core strategies as part of the Local Development Framework, it would be our very firm view that Blenheim Palace and Park WHS is already provided with a very high degree of protection for the WHS Outstanding Universal Value and thus an additional level of designated protection is unnecessary.'

2. However, the Blenheim Trustees now appear to be taking advantage of the planning process for NSIPs which can favour applications which might not otherwise succeed by circumventing purely local strategies such as those referred to in the letter. This is despite the Trustees clearly recognising at the time a) that the wider setting was of importance to the OUV of the WHS; and b) that their own Management Plan was an important source of guidance regarding the WHS's wider setting.

3. The current Trustees are quite clearly ignoring the guidance given by Appendix 3 of their own Management Plan. They are also going back on their previous arguments to justify the omission of a buffer zone. The Trustees at the

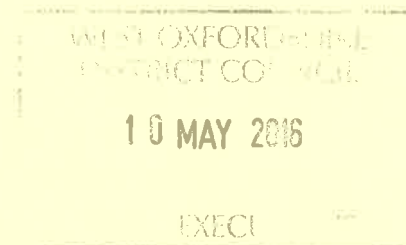
time gave particular importance to the protection provided to the WHS by the Green Belt. No buffer zone for the WHS was imposed, largely because of the protection assumed from the extent of Green Belt land surrounding the palace.

4. We believe that considerable weight in the examination should be given to this assumption, and to the ongoing relevance and importance of Green Belt land for the protection of the World Heritage Site`s Outstanding Universal Value.



9 May 2016

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Strategic Director
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Dear [REDACTED]

Blenheim Palace and Park – World Heritage Site

Thank you for your letter dated 28 April 2016 and for your request for a broader explanation regarding the Blenheim Palace and Park World Heritage Site ("WHS") and the fact that it does not have a Buffer Zone.

Under the *Operational Guidelines for the Implementation of the World Heritage Convention* issued by UNESCO, a Buffer Zone should be provided where it is deemed necessary for the adequate 'protection' of the inscribed site. Such 'protection' relates solely to negative impacts on the sites Outstanding Universal Value (the cultural or natural significance) for which a site has been inscribed by UNESCO.

UNESCO considers that if the existing protection arrangements for the setting of World Heritage Sites (WHS) are sufficiently robust to give this protection, then a special Buffer Zone is not necessary. In support of this position, UK planning guidance indicates that it may be appropriate to protect the setting of WHS in other ways, for example, by the protection of specific views and viewpoints, whilst other landscape designations may also prove effective in protecting the setting of a WHS (planning circular 07/09).

The UK Government protects World Heritage Sites in England in two ways: firstly, individual buildings, monuments and landscapes are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990 and the 1979 Ancient Monuments and Archaeological Areas Act; and secondly, through the UK Spatial Planning system under the provisions of the Town and Country Planning Acts. As the UNESCO World Heritage Centre website states "the West Oxfordshire District Council Local Plan contains policies to protect the property"

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At a local level, Blenheim Palace and Park WHS is protected by the legal designation of all its principal buildings and monuments, through numerous other designations including SSSI legislation, the register of historic parks and gardens of special interest in England, ancient woodlands and through wider designations such as the Oxford Green Belt, the Cotswolds AONB, the Wychwood Project Area, conservation area legislation and other local planning policies. All of these national and local spatial planning systems include policies for the protection for the heritage asset and its setting.

As a result of strong legal policies, conservation designation and the spatial planning system established in the UK, a significant number of UK and UK territory World Heritage Sites do not have formal Buffer Zones. In 2015, and in addition to Blenheim Palace, at least 12 World Heritage Sites in the UK did not have formal Buffer Zones - these sites included Blaenavon Industrial Landscape, Ironbridge Gorge, Old and New Towns of Edinburgh, the Palace of Westminster, Stonehenge and Avebury, and the Tower of London.

Unlike other World Heritage Sites, Blenheim Palace is in the extremely rare position, both national and internationally, of being a WHS in single ownership. As such the property has very effective control and direct management of the WHS and has an unprecedented ability to conserve the Outstanding Universal Value of Blenheim for which it is inscribed. A robust management plan for the WHS has been in place since 2006 and it is monitored on an annual basis by ICOMOS-UK, Historic England, Natural England and the local planning authorities amongst others. The WHS Management Plan, which is in the process of being reviewed and updated, is supplemented by other comprehensive management plans for visitor management, conservation of the historic park and the SSSI/ancient woodland interests within the setting.

As UNESCO state, the Estates firm implementation of the existing policies in the WHS management is important to provide effective protection for Blenheim and its setting. It is 'important to ensure that the management of the Park prioritizes the conservation of the elements of the landscape that reflect the work of Vanbrugh and Brown'.

As noted above, UNESCO considers that if existing protection arrangements for the setting of a WHS are sufficiently robust, then a special Buffer Zone is **not** necessary. While the UK Government supports appropriate measures to protect the setting of a WHS, for example by the protection of specific views and viewpoints, specifically in reference to Blenheim Palace and Park, the WHS Management Plan 2006 assessed the setting and highlighted key views and viewpoints that needed to be conserved.

The annual monitoring by ICOMOS-UK, Historic England and others monitors progress and implementation with regard to the 33 stated objectives in the WHS Management Plan 2006 and checks awareness with regard to monitoring any issues regarding the integrity of the property, particularly with regard to the continuous monitoring of the key visual links.

While UNESCO and ICOMOS prefer to have a Buffer Zone established at the time of inscription, many sites were inscribed before the developing concept of Buffer Zones was established. However, it is correct to say that a zone can be established at a later date.

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Whilst the ability to establish a buffer zone sits with the Estate, its purpose would be to protect the Outstanding Universal Value of the WHS and its wider context. If the Estate felt it necessary to promote the establishment of a buffer zone, then in the UK this could only be done through designations and the local planning system and as such the mechanism for introducing that protection would fall on the local planning authority.

To establish a Buffer Zone would imply that the local development framework documents are not up to the task of conserving heritage assets and their setting, which is firmly not our view and it is also not the view expressed by UNESCO and other advisors.

The concept of a Buffer Zone and setting will be part of the WHS management plan review and the Estate will not pre-empt the recommendations and conclusions of that review. However, given the strong statutory and local plan protections for heritage assets, the Oxford Green Belt and natural environment features such as the Cotswold AONB coupled with the fact that the local authorities have recently produced, or are in the process of producing, new core strategies as part of the Local Development Framework, it would be our very firm view that Blenheim Palace and Park WHS is already provided with a very high degree of protection for the WHS Outstanding Universal Value and thus an additional level of designated protection is unnecessary.

I hope that the above helps by way of a broader explanation on this matter but please do not hesitate to revert back to me if you wish to discuss this further.

Yours sincerely



Chief Executive



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