



DEADLINE 5

**SUBMISSION OF 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 3 SUBMISSION: 12 September 2025

1. Introduction

- 1.1. Historic England is more formally known as the Historic Buildings and Monuments Commission for England. We are the Government's statutory adviser on all matters relating to the historic environment, including world heritage.
- 1.2. It is our duty under the provisions of the National Heritage Act 1983 (as amended) to secure the preservation and enhancement of the historic environment. There is also, in this case, the requirement in Article 4 of the 1972 'Convention Concerning the Protection of the World Cultural and Natural Heritage' to protect, conserve, present and transmit the values of the Blenheim Palace World Heritage Site.
- 1.3. The following text is the Historic England response to the representations/observations in various documents submitted by other parties and to which the Examining Authority would like to be in receipt of by Deadline 5, September 12 2025. Whilst noting that representations/observations have been made by other parties, we have only provided comment where appropriate on those representations/observations. In not responding to all the representations/observations, this should not be taken that an absence of comment is implicit agreement with the representations/observations.

2. Comments on any submissions received at Deadline 4

2.1. Applicant's Responses to other Deadline 3 Submissions **REP4-038**

Trial trenching

- 2.2. We are disappointed to see that, despite reassurances given at various points, the results of the archaeological field evaluation are still not forthcoming. This is stated to be due to an unresolved contractual issue (page 32 of the Applicant's Responses to other Deadline 3 Submissions (REP4-038)). We remain in a position where we are unable to advise on the suitability of the buffer which is currently proposed around the scheduled monument of Sansom's Platt.
 - 2.3. The applicant indicates that this information might not be available until post determination to inform the design details which would be submitted to local authorities as a requirement of the DCO, after this application has been determined.
 - 2.4. Rather than leave this key issue to so late a stage (when the issue may well remain unresolved), we suggest the following options might be considered:
 - a. Provide Historic England (and Oxfordshire County Council) with just the results of the trenches that were excavated in the fields that currently include the buffer zone (fields
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1.11 – 1.14 in the geophysical report included with the Environmental Statement APP-134) in order that we can provide advice to help resolve this point before the determination of the DCO.

If this cannot be done due to the contractual issue, then:

- b. Remove fields 1.12 and 1.13 entirely from the scheme and remove a greater proportion of field 1.11 and field 1.14. While it is (as we have previously stated) currently not possible to establish the boundaries of the Roman settlement, we believe that extending the buffer in this way is reasonably likely to reduce any harm to the potentially nationally important area to a minimum.

Development Consent Order

- 2.5. In relation to the applicant's response to us (**REP4-038**) with regards to the DCO process, there are instances we feel Historic England should be a named consultee within certain Requirements in Schedule 2 of the DCO. We have identified to the applicant the Requirements where it would be beneficial for Historic England to be named as a consultee, in line with other named consultees. We hope these changes can be reflected in the next draft of the DCO.

3. Clarification of Historic England's role and approach on points relevant to the Examination

- 3.1. We do not wish to provide a commentary on other interested party responses, which were submitted and received at Deadline 4. However, there are some instances where some responses are factually incorrect. We therefore have provided the information below to assist the Examining Authority and other participants through the examination.

Historic England's approach to assessing the impacts on designated heritage assets through changes to their setting

- 3.2. When assessing the impact of change within the setting of a designated heritage asset on its significance, Historic England's assessment is guided by our Good Practice Advice in Planning Note 3 'The Setting of Heritage Assets'. We do not make a distinction between the immediate and wider setting as these terms are not regarded as having any particular formal meaning (GPA 3 page 5). Our advice therefore always refers to the setting of an asset as a whole.

Historic England's role in advising the UK State Party to the World Heritage Convention

- 3.3. The Department for Culture, Media and Sport (DCMS) represents the UK State Party to the UNESCO 1972 World Heritage Convention. Notifications regarding development
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proposals potentially affecting World Heritage properties are issued by DCMS, in this role, to the World Heritage Centre, the Secretariat for the World Heritage Committee. Historic England's role is to provide technical advice to DCMS on the implementation of the World Heritage Convention.

- 3.4. Information submitted by the State Party may be shared with the World Heritage Committee's Advisory Bodies (principally ICOMOS International for cultural heritage) for their review and advice. This process is known as Technical Review. Technical Review may be proactively requested by the State Party, or the World Heritage Centre may decide it is required. DCMS is ultimately responsible for deciding whether a case will be notified to the World Heritage Committee and whether a Technical Review will be requested from ICOMOS International, having sought advice from their technical advisers at Historic England.
- 3.5. Management of a cycle of technical advice usually takes a minimum of 12 weeks from the request being made by State Party to the receipt of advice from the Advisory Bodies. ICOMOS' latest Technical Review report was shared with the Examining Authority at Deadline 4.

Historic England's Position on the August 2025 ICOMOS Technical Review

- 3.6. We are still in the process of reviewing ICOMOS' latest Technical Review and we will provide further comment as necessary.
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