



Begbroke and Yarnton Green Belt Campaign (BYG)

Deadline 6, BYG: Comments on views regarding the setting of the Blenheim Palace World Heritage Site as expressed by ICOMOS International, Historic England and the Blenheim Trustees.

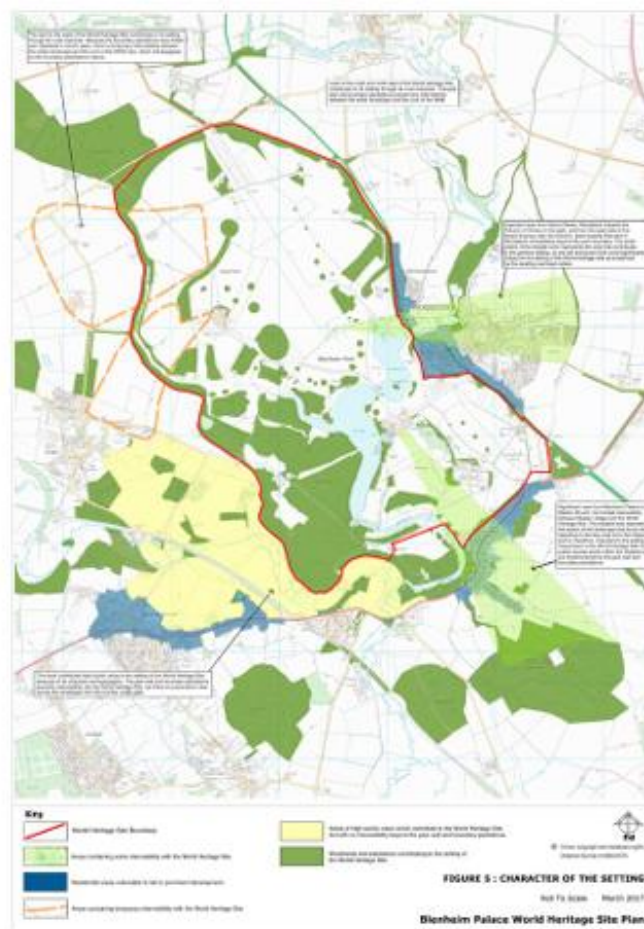
It is an uncomfortable truth that the only entity that has remained steadfastly consistent in its approach to the impact of development on the OUV of Blenheim Palace is ICOMOS International. Their consistency has created some alarm amongst other stakeholders.

1.1 The Blenheim Trustees hold responsibility for safeguarding the WHS. As is well known, they prepared the Blenheim Palace World Heritage Site Revised Management Plan 2017. This includes the important Setting Study in Appendix III. The Study underlines the high importance of the wider setting to the OUV of the WHS. It is neatly summarised in paragraph 5.07 as shown below.

One of the key characteristics of the surroundings of Blenheim Park is that much of the setting lies within the wider extent of the Blenheim estate - which is effectively managed by a single owner. It has been owned by the Dukes of Marlborough for 300 years (one of the attributes which contribute to OUV) and has in recent years been recognised as an outstanding property of national heritage value. Thus for almost 300 years management of the wider estate has acted as a means of both supporting the historic core and protecting it. 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.

1.2 This paragraph contrasts very strongly with what is now proposed by the Trustees. It is followed by the map shown below highlighting some of the features of the landscape considered to be important. Since the text on the map is difficult to read, even on the copy on the Blenheim website, BYG has added explanatory **notes** below.



Light green represents “areas containing some intervisibility with the World Heritage site.”

Notably, this includes the large stretch of land up to Bladon Heath which would be covered with panels by the Botley West project.

The dark green represents “Woodlands and plantations contributing to the setting of the World Heritage site”.

Three large areas of woodland to the south of the WHS fall into this latter category. Their prominence indicates that the wider setting, considered in the Study to be of importance to the OUV of the WHS, extends quite far to the south.

1.3 In paragraph 4.15 of Appendix III, the Study highlighted the potential risks from large scale development and included “*Large-scale renewable energy generation schemes such as solar farms or tall wind turbines*”. This is precisely the risk that has now materialised.

1.4 The foregoing summary provides the context for the views now being expressed by ICOMOS International. It indicates why they are so concerned by what is being proposed.

2.1 A letter written by the Blenheim Trustees in 2016 is attached to our submission REP5-063. It argued that the presence of Green Belt land provided the protection needed for the OUV of the WHS; in consequence, no protective buffer zone was required. Yet it is this Green Belt land which the Trustees now propose to industrialise with the BWSF solar development.

2.2 The conclusions of their own Management Plan described above are potentially inconvenient for the Trustees. They would be able to raise significant funds from the BWSF project for the family members who benefit from the wider estate. The somewhat convoluted document they commissioned from *tor&co* (REP5-063) really adds nothing sensible to the debate and could be interpreted as an attempt to move the goal posts on behalf of the Trustees.

3.1 The position taken to date by Historic England (HE) is very difficult to understand. In their D5 submission (REP5-098) they included the following statement.

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.

3.2 It really is not clear why this statement was made. The meaning of the wider setting of the Blenheim WHS is well understood. It is even a term used by Historic England themselves in their submission REP1 026 (07/02/24) when describing Blenheim Estate land outside the park itself. Yet to date the approach taken by HE with BWSF has been to limit their focus to the small parcels of land abutting the curtilage of the WHS, and only to deal with specific heritage sites within the larger Blenheim Estate area.

3.3 As shown previously, the Central Site is largely the area considered in the 2017 Blenheim Management Plan to be the rural landscape that contributes to the OUV of the WHS. No view has explicitly been expressed by HE regarding the general impact on the OUV that would arise from the effective industrialisation of this Central Site by the BWSF project.

3.4 On the contrary, in paragraph 6.34 of the report by *tor&co* commissioned by Blenheim Estate, the following information is provided.

HE's latest position, expressed in its letter to Mr Owen-Lloyd advising on the proposed Change Request 2 [REP2-045] is that the removal of solar panels from the fields identified in its D1 submission [REP1-086] would have 'the potential to remove the previously identified harm to the Outstanding Universal Value of the WHS and the significance of the ensemble of the RPG and palace.'

3.5 HE made this statement as though the industrialisation of the remainder of the central part of the WHS`s wider setting has no relevance to its OUV. This view is simply not consistent with the concerns raised in the 2017 Management Plan.

3.6 It is also of interest that *tor&co* expressed frustration in their following paragraph 6.35 that HE had previously informed Blenheim that the removal of the panels would "*be sufficient to avoid any harm to the contribution made by the rural landscape to the significance of the WHS and to maintenance of its attributes of OUV*"; i.e. with the previously qualifying word `potential` removed.

3.7 This is an extraordinary conclusion, completely at odds with the Setting Study in the 2017 Management Plan. The indication is that HE has previously been excessively accommodating towards Blenheim during early discussions of the BWSF project.

3.8 On the other hand, ICOMOS International has correctly and consistently maintained their more comprehensive approach to setting. It is BYG`s view that considerable weight should be attached to their conclusions.
