

## **Parks & Valleys Regional Park: A Cohesive Overview**

This submission highlights concerns about Blenheim Palace's World Heritage Site status, particularly issues arising from its single ownership model and shortcomings in the current UNESCO designation. It argues that the existing Regional Park's large-scale green infrastructure projects, such as biodiversity restoration and community-led renewable energy, offer superior outcomes compared to the BWSF proposal. The adoption of the All England Strategic Landscape Mapping Tool is also noted as a means to enable more inclusive and sustainable landscape management for the region.

### **Introduction:**

The Parks & Valleys Regional Park, developed by Glyme Valley CIC, is a landscape of rich heritage, natural beauty, and cultural significance. This section explores the complex challenges and opportunities facing the region, drawing on current frameworks, recent proposals, and the unique historical context to argue for a resilient, place-based approach to landscape management and development.

Granting the DCO to the Applicants would obliterate these vital place based and resilient alternatives that are known to support community cohesion, local economic resilience and green energy solutions. Its important to note that we are guided by the Resileince Framework 2023 and the Reilience Action Plan 2025 in which 'wole'-of'society' infrastructure solutions are advocated.

### **1. A Myriad of Fault Lines:**

Yesterday's submission by Mr Sumner identified a significant fault line across the region's heritage. However, it is crucial to recognise that there is not merely one isolated fault line to be highlighted. Rather there is a myriad of fault lines that permeate the economy, health, housing, nature, energy, water, and transport sectors. The BWSF proposal is not the source of these fractures, but its implementation threatens to a) worsen them and b) to lock the problems in for 40 years minimum. As a homogenous development, BWSF would undermine regional resilience and contradict the whole-of-society, place-based solutions mandated by the Resilience Framework 2023.

In contrast to soloed, monocultural Net Zero solutions, we have conceived the (alternative) Next Zero initiative to illustrate a broader, more inclusive perspective in alignment with Resilience. Its purpose is to transcend the limitations of Net Zero approaches that often result in compartmentalisation, instead championing regional-scale resilience and economic, green recovery (EGR).

### **2. If It Ain't Broke, Don't Fix It:**

The Parks & Valleys Development Proposal (PVDP) does not address a blank slate; the region's story extends far beyond any single project or architectural milestone. The area's heritage, nature, economy, and culture have been significant for thousands of years, long before Blenheim Palace

was constructed. While Blenheim Palace remains an iconic heritage asset, it is the new kid on the block relatively to the context of the Glyme Valley's 2,000 - 3,000 year cultural history.

The enduring resilience of the region's heritage and the continuous evolution of the Parks & Valleys Regional Park provide a robust foundation for the whole region. This resilience remains intact, and thus, there is no necessity for the BWSF proposal to attempt to 'fix' what is not broken. Further, the BWSF proposal contradicts the very resilience that serves as our foundation

### **3. 'Whole of Society': The Resilience Framework 2023 and Resilience Act August 2025:**

The Resilience Action Plan of August 2025 calls for solutions that engage the entire society. Indeed, the Action Plan calls it 'Whole-of-Society.' Despite this, the BW proposal appears to have been introduced with minimal regard for the unique characteristics of the region, disregarding the importance of place-based considerations and broader resilience. If anything, BW poses a threat to the established continuity and rich heritage that have characterised the region for millennia. With the help of the Resilience Framework's 'whole-of-society's foundation, our mission is to enable the region's already long heritage to continue for another millenium

The ethos underpinning BW runs counter to key local and national policies, including the Resilience Framework 2023, the Resilience Action Plan 2025, the WODC Local Plan 2041, and Devolution 2028. Together, we have defined these as Next Zero. True resilience and heritage stem from a region's unique sense of place. The Parks & Valleys Regional Park already exemplifies regional climate action. The BW proposal, with its uniformity and monocultural solution, offers nothing to the region's legacy or resilience.

Further, BW creates a literal physical and conceptual barrier, a striation between the Cotswolds National Landscape and the Oxford Green Belt that further undermines the necessary connectivity for regional resilience.

### **4. UNESCO World Heritage Site and Outstanding Universal Value:**

Engagements with World Heritage UK and Historic England have raised several concerns regarding Blenheim Palace's World Heritage Site status and its Outstanding Universal Value (OUV).

- **Single Ownership:** The centralisation of ownership at Blenheim Palace is believed to be at the root of many local development issues. The current 2017 Management Plan, along with associated housing and the BW proposal, would not be permissible under a more distributed ownership model as is standard among many UNESCO WHSs.
- **UNESCO Designation:** There is a need to revisit and potentially revise the UNESCO cultural designation for Blenheim Palace. The existing designation overlooks the importance of a) the Glyme river beyond the WHS nucleus and misattributes the cultural significance regarding Vanbrugh and Brown.

## **5. Green Infrastructure Projects in the Regional Park:**

- BNG: Ancient Meadows and Seed Banks;  
The BW proposal claims to deliver Biodiversity Net Gain (BNG), but scale is a critical factor. The Regional Park, with its vast expanse and ongoing ten-year restoration of woodlands, meadows, and grasslands, will yield far greater BNG outcomes than any contribution from the comparatively small BW proposal. The argument that BW meaningfully contributes to BNG does not withstand scrutiny when considering the scale of the Regional Park's purposes and achievements.
- REM: Community Renewables;  
The region is already committed to community-led renewable energy projects. With funding from the Department for Energy Security and Net Zero (DESNZ), the area is exploring ways to expand these initiatives, which are founded on community ownership models. In contrast, the BW proposal is based on single ownership. Achieving 100MW of electricity production is feasible through 20 community sites of 5MW each, ensuring inclusivity and equity—principles that the BW approach cannot accommodate.

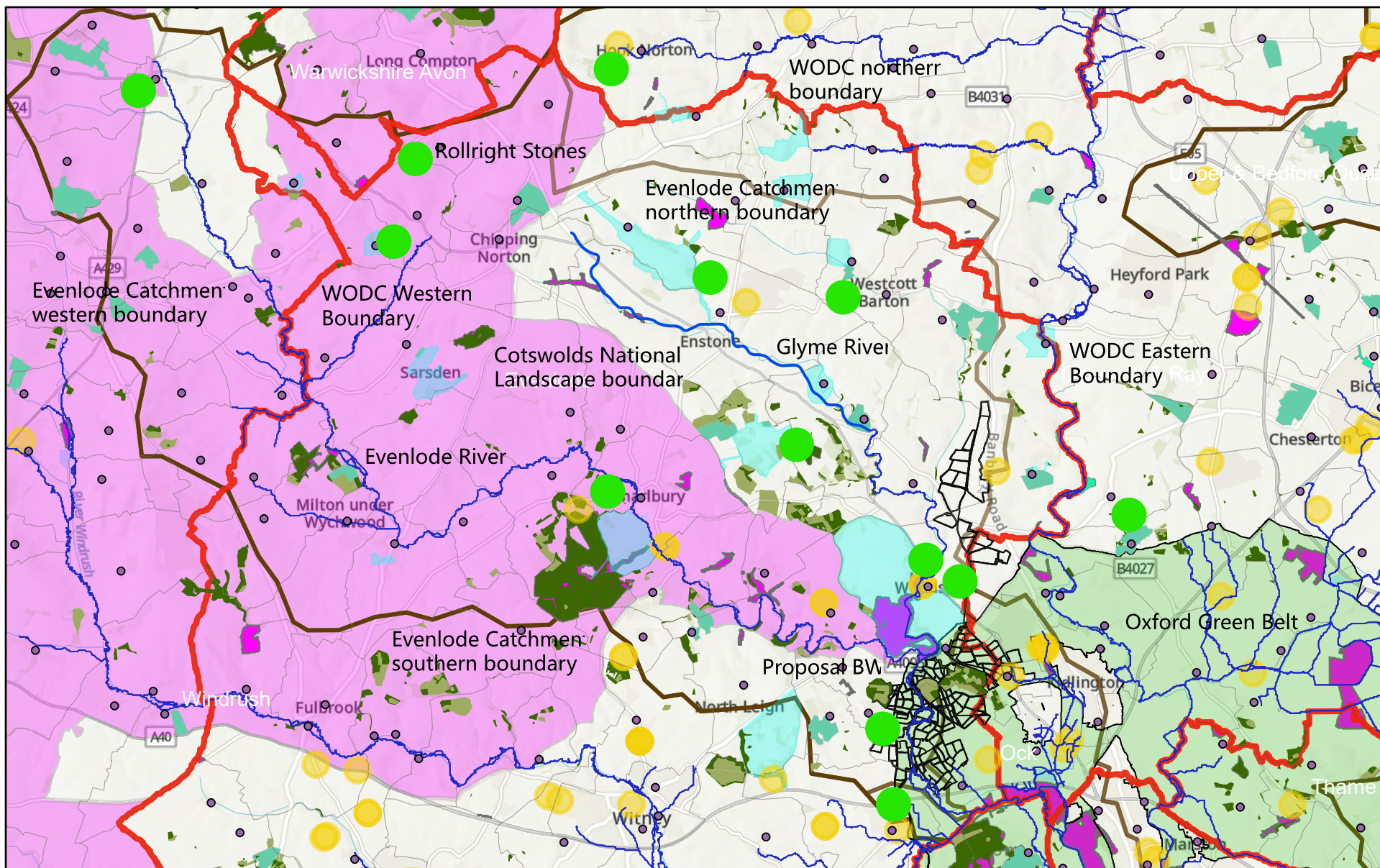
## **6. All England Strategic Land-Use Tool (Natural England 2022):**

In addition to heritage, green infrastructure, WODC Local Plan and the UK Resilience Framework, we are integrating Natural England's All England Strategic Landscape Mapping Tool (AESLMT) to this region. This tool is complementary to the Resilience Action Plan 2025 and supports a more sophisticated and inclusive approach to landscape management, enabling informed decision-making and the identification of strategic priorities for a future-proofed landscape. Beyond identifying potential National Parks and National Landscapes, the AESLMT also highlights regions where alternative landscape approaches may be more appropriate, aligning with the Regional Park's commitment to sustainability and inclusivity.

## **Conclusion**

We are carefully triangulating our course re the direction of the Regional Park as a model for regional resilience. This is why the Resilience Framework 2023 and Resilience Action Plan, and WODC Local Plan are guiding lights. Upon careful scrutiny of the map that conveys scales and granularity so clearly, one can only be struck by the contrast between the monocultural BW proposal and the highly granular placebased 'whole of society' model on which the Regional Park is based.

# Parks and Valleys Regional Park

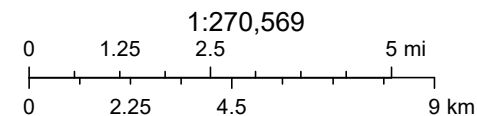


10/8/2025

- Church of England Churches - open churches - points
- Statutory\_Main\_River\_Map\_Variations\_2022
- Appeals
- PARNCP\_2011\_EW\_BGC
- Renewable Energy Planning Database (DBEIS)
- Local Nature Reserves (England)

- Ancient Woodland (England)
- Ancient & Semi-Natural Woodland
- Ancient Replanted Woodland
- Local Nature Reserves (England)
- 220312 Botley Wets Solar park/Nat Grid
- Historic Parks and Gardens
- England's Historic Parklands (Undesignated)

- Local Authority Districts (May 2024) Boundaries UK BFC
- England Green Belt 2022
- Site of Special Scientific Interest (England)
- CaBA Catchment Partnerships
- 2001 - 2041
- 2041 - 2041.09
- World\_Hillshade
- Areas of Outstanding Natural Beauty (England)
- 68.65 - 69
- 69 - 2,041
- 2,041 - 2,041.09
- World\_Hillshade



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri, Ordnance Survey, NASA,