



**DEADLINE 6**

**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 6 SUBMISSION: 20 October 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 Examining Authority have set out that the following submissions are required by Deadline 6:
  - Written summaries of oral submissions made at any Hearings held during the week commencing 6 October 2025.
  - Any post-hearing submissions requested by the ExA
  - Responses to the RIES (if required)
  - Comments on the Examining Authority's proposed schedule of changes to the draft Development Consent Order (dDCO)
  - Comments on any other information and submissions received at D5
  - Any further information requested by the Examining Authority under Rule 17 of the Examination Procedure Rules

## 2. Written summaries of oral submissions made at any Hearings held during the week commencing 6 October 2025.

- 2.1. Issue Specific Hearing 2 (ISH2) Agenda item 3d Cultural Heritage focussed on the following matters relevant to Historic England, which we will comment on in turn both to support our verbal submissions and in response to the submission made by other Interested Parties made during the hearing.
  - World Heritage Site matters including ICOMOS review and derivation of benefits to heritage assets
  - Change Request 2 and other areas proposed for exclusion
  - Archaeology including trial trenching and Samsons Platt

### World Heritage Site matters including ICOMOS review and derivation of benefits to heritage assets

- 2.2. Historic England is aware of the difference in its own professional judgement to those reached by ICOMOS International (hereafter ICOMOS) in their Technical Reviews. Historic England is in dialogue with ICOMOS following their latest Technical Review (**REP4-052**) regarding their assessment of the level of harm to the OUV of the WHS. The State Party has also requested further clarification from ICOMOS following this latest Technical Review. We understand ICOMOS intends to provide a further report to the State Party before the close of the Examination and have ensured that they are aware of the Examination's timetable.
  - 2.3. Historic England's assessment, as set out in our Written Representations (**REP1-086; 5.20-5.47**), was structured to follow the approach set out by UNESCO in their guidance
-



and has taken account of how the application site contributes to the significance and experience of the WHS/RPG in accordance with our own guidance in GPA3. The UNESCO/GPA3 methodologies are compatible and can both be utilised within the planning system. Using these methodologies alongside the information provided by the applicant, we assessed the impact on the property's OUV, including in relation to each of the attributes of OUV and the ability to appreciate them, as well as the integrity and authenticity of the WHS.

- 2.4. Historic England will communicate any further relevant correspondence from UNESCO/ICOMOS that we receive to the ExA.

#### Change Request 2 and other areas proposed for exclusion

- 2.5. Historic England welcomes the changes brought forward in Change Request 2, which have removed the solar panels from those fields with a strong intervisibility with and connection to the WHS and from which the Blenheim ensemble can be appreciated in a countryside setting. These changes appear to have minimised harm to OUV and avoided intervisibility with the WHS, broadly addressing the harm we identified in our earlier advice.
- 2.6. The applicant has maintained, in its revised HIA submitted at Deadline 5, that Attribute 7 is the sole attribute that is affected by the development. As set out in our Written Submissions (**REP1-086; 5.12-5.13**), whilst we agree that Attribute 7 draws strongly on the contribution made by the property's setting to its significance, it is not the only attribute that does so. Attributes 1,4 and 5 convey associative values that can also be drawn from the contribution made by the WHS' setting. Having reviewed the applicant's revised Heritage Impact Assessment (**CR2-036**), those attributes and the impact of the proposed development on these have not been fully considered as part of their assessment.
- 2.7. In Historic England's view, the revised development would continue to place solar panels on fields which contribute to the ability to appreciate or to the maintenance of the attributes of OUV of Blenheim. However, in our view solar panels on these fields would not harm the contribution made by those fields to those attributes, but would nonetheless result in a change in how the land supports Blenheim. The change to the use of the land while under PV panels would still support and maintain Blenheim's OUV.

#### Archaeology including trial trenching and Samsons Platt

- 2.8. Following the Issue Specific Hearing Historic England has recently received the draft trial trenching report from the Applicant. We are reviewing this document, and we will continue to discuss this matter with the applicants. We will provide the Examining Authority with our representations on this matter by Deadline 7, if not earlier.

### **3. Any post-hearing submissions requested by the ExA**

- 3.1. None requested

### **4. Responses to the RIES (if required)**

- 4.1. No comment from Historic England
-

## **5. Comments on the Examining Authority's proposed schedule of changes to the draft Development Consent Order (dDCO)**

- 5.1. Historic England has no comment to make in relation to the Examining Authority's proposed changes to the draft Development Consent Order. However, Historic England would note that further to our Written Representations (request for inclusion as a consultee on certain matters – **REP1-086**; 7.3), and subsequent confirmation of the Applicant's willingness to engage in dialogue on this (**REP4-038**), we are pleased to report that there has been positive discussions for provision within Requirements 5, 6, 8 and 12 of Schedule 2 of the DCO for Historic England to be a named consultee. We are in the process of agreeing appropriate wording for these Requirements with the applicant and that this can then be incorporated into the DCO.

## **6. Comments on any other information and submissions received at D5**

- 6.1. In relation to representations/observations made by other parties at Deadline 5, Historic England does not have any comment. Our absence of comment to these representations/observations should not be taken as implicit agreement with those representations/observations.
- 6.2. The following text relates to Historic England response to the Change Request 2 documentation.
- 6.3. Historic England welcomes the submission and acceptance of the Change Request 2, which compromises two changes that are relevant to Historic England.

Change 1 - Reduction in Order Limits boundary to reduce the solar installation area southwest of Bladon, and removal of solar arrays on land east of Bladon and north of Heath Lane

Change 2 - Reduction in Order Limits boundary to reduce the solar installation area near to Oxford Airport;

Change 1 - Reduction in Order Limits boundary to reduce the solar installation area southwest of Bladon, and removal of solar arrays on land east of Bladon and north of Heath Lane

- 6.4. Change 1 has removed solar development from the fields we requested in our Written representations (REP1-086; 5.56) to the southwest and south of Bladon.
- 6.5. We consider that this amendment has resulted in the removal of solar panels from those fields that have a strong intervisibility with, and connection to, the WHS and from which the Blenheim ensemble can be appreciated in a countryside setting. In our view, these changes have minimised the harm to OUV and avoided intervisibility with the WHS, broadly addressing the harm we identified in our earlier advice.
- 6.6. A further iteration of the HIA has been submitted as part of the documentation supporting the change request. As outlined above, Historic England has drawn different conclusions from its own assessment of the potential impact on the World Heritage property's OUV. Our assessment has been undertaken in accordance with UNESCO's 2022 *Guidance and Toolkit for Impact Assessments in a World Heritage Context* and our own *Good Practice in Planning Advice on the Setting of Heritage Assets* (2017). We considered how the setting of the property contributes to its attributes of OUV and the ability to
-

appreciate them as well as its authenticity and integrity. The baseline for assessing impact on OUV is set at the time of inscription. This is as described in the Statement of Outstanding Universal Value adopted, retrospectively, by UNESCO in 2013. As a standalone document produced to inform the overall Environmental Impact Assessment, it would be in our view entirely appropriate for the HIA to apply the relevant methodology in relation to the WHS in isolation. Its results can still inform the overall conclusions of the Environmental Statement.

- 6.7. The subject of cumulative impact is part of our ongoing dialogue with ICOMOS as outlined above. This point will be addressed as part of our concluding submission at Deadline 7.
- 6.8. As set out in our Written Representations (**REP1-086**; 6.20) we stated we would provide comment on the additional visualisations we requested from the applicant to address gaps in the assessment. These have now been provided by the applicant in document 12.7 *Additional Photomontages for Historic Environment Assessment (Rev 1)* (**CR2-059**). We welcome this submission, which confirms solar arrays would not be visible from within the World Heritage Site or from the fields we have identified as those which have a strong intervisibility and connection to the World Heritage Site. The visualisations demonstrate there would be no impact during the operation of the development. We are also content that following the Change Request 2, the impacts from the construction and decommissioning phases (e.g. noise and lighting) from within the World Heritage Site (**REP1-086**; 6.21) would be minimal and any residual impacts can be minimised through the measures set out in the Outline Code of Construction Practice (**CR2-045**; 1.8.17).

Change 2 - Reduction in Order Limits boundary to reduce the solar installation area near to Oxford Airport

- 6.9. This change has removed solar arrays from fields near Oxford Airport. As set out in our written submission (**REP1-086**; **5.86-5.88**) some of these fields contribute to the significance of the Church of St Michael, Begbroke, as it is from within some of these fields that the church can be experienced within its traditional agricultural context.
- 6.10. The removal of these fields for solar production does therefore help to better preserve the countryside setting the church can be experienced within. In our view this does, to a degree, reduce the harm the development would have on the church's significance through development in its setting.
- 6.11. We maintain the position that the proposed development would continue to erode the ability to experience the church in its traditional agricultural context from the fields to the north of the church. As set out in our Written Representations (**REP1-086**; 5.90) we concluded the magnitude of impact would be low adverse by the criteria offered in Table 7.9 and in NPS terms would amount to modest harm to the significance of the heritage asset from development within its setting. Whilst this change does slightly reduce the harm, it is not sufficient to change the conclusions we have reached on the level of harm this would cause.
- 6.12. Therefore, our position as set out in our Written Representations (**REP1-086**; 5.91-5.92), remains valid.
-

**7. Any further information requested by the Examining Authority under Rule 17 of the Examination Procedure Rules**

7.1. No comment from Historic England