

## ICOMOS Technical Review

<b>Property</b>	<b>Blenheim Palace</b>
<b>State Party</b>	<b>United Kingdom of Great Britain and Northern Ireland</b>
<b>Property ID</b>	<b>425</b>
<b>Date of inscription</b>	<b>1987</b>
<b>Criteria</b>	<b>(ii)(iv)</b>
<b>Project</b>	<b>Botley West Solar Farm</b>

### 1. Background

Before the current Planning Inquiry started on 13 May 2025,<sup>1</sup> ICOMOS provided a first Technical Review of Botley West Solar Farm project in February 2024. This indicated that a detailed setting study based on Landscape Character Assessment (LCA) was needed to facilitate an understanding of the consequences of the proposed solar farm development on the Outstanding Universal Value of the Blenheim Palace World Heritage property. ICOMOS made this recommendation as the current Setting Study was seen as insufficient to provide the farmwork necessary for assessing precisely the potential impact on Outstanding Universal Value of this extensive solar farm and where elements might be acceptable and where not.

Such a detailed Setting Study that defined the setting and how it contributes to Outstanding Universal Value could have formed the agreed basis on which all parties set out their responses to the Inquiry. This approach has not been followed. Instead, as the Inspector now states, the Inquiry has spent much time struggling to define the setting.

While in various submissions to the Inquiry LCA has been referenced<sup>2</sup>, LCA on its own does not define setting, as it is merely a tool towards that end.

ICOMOS's view remains that the massive scope of this project will devastate the intactness of the setting and impact adversely on Blenheim Palace's Outstanding Universal Value (OUV). In order to understand the precise impact on every aspect of the setting that would be impacted, as well as whether some areas might accommodate solar panels, a detailed Setting Study still remains essential in ICOMOS' view.

### 2. Purpose of the third Technical Review

This third Technical Review has been prepared in response to a request by Historic England that ICOMOS provide further detailed analysis to support its view of the negative impact the current proposals would have on the Outstanding Universal Value of the property. This request, it is understood, reflects further questions set by the Inspector to Historic England [Further details are set out in the Context at the foot of this Technical Review].

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<sup>1</sup> <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010147/examination-timetable>.

<sup>2</sup> Letter from the State party to UNESCO World Heritage Centre dated 23 October 2025, p. 1.

Below, ICOMOS offers an analysis of the setting and wider setting of the property, what they encompass and how they relate to Outstanding Universal Value, based on evidence put forward in historic evidence and local assessments undertaken in relation to previous development in the setting and submissions to the Inquiry.

ICOMOS wishes this third Technical Review to be submitted to the Inquiry alongside its first two Technical Reviews, which have already been made available.

ICOMOS notes that a number of documents that address the landscape of the setting of the Blenheim Palace World Heritage property have been amended following the last ICOMOS review of July 2025. The revision of the Landscape and Visual Impact Assessment does not provide any substantive new evidence on how the broader landscape setting supports the understanding of the Outstanding Universal Value of the property, and neither does the Appendix 8.1 Landscape Character or the Appendix 8.2 Landscape Value, while the revision of the Heritage Impact Assessment (Rev1) notes that the approach to Cumulative Effects Assessment (CEA) requested by ICOMOS, as reflected in recent guidance issued by UNESCO titled *World Heritage and Renewable Energy: Guidance on Wind and Solar Energy Projects in a World Heritage Context*<sup>3</sup>, is different to the one used in the Applicant's CEA, which is based on appropriate guidance issued by the Planning Inspectorate (Par 1.4.110).

### **3. The Outstanding Universal Value of Blenheim Palace**

The Statement of Outstanding Universal Value for Blenheim Palace states that it was inscribed for its influence on “the architecture and organisation of space in the 18th and 19th centuries” in England and abroad, and for being “typical of 18th century European princely residences”.

In order to fully understand in detail this influence and typicality, Blenheim Palace needs to be seen and understood not just as a palace, but rather as the centre of a large country estate, a working landscape beyond the walls that supported its palace. The palace was and still is more than a monument in ornamental grounds, but rather the centre of an economic and social unit that encompasses land and settlements beyond its walls.

This estate has been an administrative unit since 1241, when it had six manors. In 1705, the Old Royal Manor and Park at Woodstock was granted by Queen Anne to the Duke of Marlborough following his victory over the French at the Battle of Blenheim in 1704. The ruined manor was demolished and Blenheim Palace built in its place at the centre of the estate, then encompassing some 15,000 acres and including seven villages.

The estate has a symbiotic relationship with the Palace. For the Outstanding Universal Value of Blenheim Palace and grounds to be well understood, the estate needs to demonstrate its link to the Palace and how it provides its geo-cultural context as encapsulated in its authenticity - the ability of a property to convey its value.

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<sup>3</sup> <https://whc.unesco.org/en/renewable-energy/assessing-impacts>.

#### 4. The setting of Blenheim Palace

The setting and wider setting provides the context for World Heritage properties, and any “feature, quality or characteristic” of the setting that contributes to the Outstanding Universal Value of the property needs to be protected, as set out in the United Kingdom’s Levelling Up and Regeneration Act, 2023<sup>4</sup>).

In terms of features’ quality and characteristics, ICOMOS considers that these go beyond visual aspects and should encompass several other dimensions. The Advisory Body supports the first sentence on the Blenheim Palace website section ‘Our Estate’, which states that “At Blenheim Estate we know that the benefits from our land are not contained within our boundaries. Those benefits extend to our neighbours and communities to the air we all breathe, the physical and mental health we enjoy, the jobs and skills we encourage, and the quality of the food we consume”.<sup>5</sup>

In defining the setting of Blenheim Palace, it is thus essential that the setting is not just seen in visual terms, but also for the way it reflects its geo-cultural context. While the setting has changed over time, its protection should ensure its basic messages can still be understood and that change is not so great as to eliminate its key associations.

As Historic England has stated, “The landscape character around the WHS not only adds to the visual appeal one would expect around a stately home, but also contributes to an understanding of how the Blenheim Estate functioned, and thus contributes to its historic value”.

The Palace now sits within an expansive estate of 12,000 acres, consisting of agricultural lands, woodland, and grazing rolling hills within which lie Woodstock and the network of villages. The Statement of Outstanding Universal Value for the World Heritage property mentions that: “The buildings and Park were laid out over an earlier Roman and medieval landscape, remnants of which are still visible through the Vanbrugh and Brown landscapes”. Many aspects of the earlier landscape prevail in the wider estate.

In ICOMOS’ view it is more than visual appeal that contributes to the value of the estate and the contribution of the estate as the setting of the World Heritage property. The Duke of Marlborough was given an estate to match the status he was deemed to deserve, and its mosaic of historic parkland, rolling hills, farmland and woodland that anchored the new Blenheim Palace in its landscape gave it the status of an historic manor.

This estate still contains the integrity it had when Blenheim was built in terms of it still being linked to the Palace through ownership and use, and in terms of how its evolution still allows an understanding of its 18<sup>th</sup> layout. It is therefore a cultural unit that should be respected for its inextricable links to the Palace. The scope, extent and integrity of the estate is vividly shown in drone views.

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<sup>4</sup> <https://www.legislation.gov.uk/ukpga/2023/55>.

<sup>5</sup> <https://www.blenheimpalace.com/estate/>.

The authenticity of a World Heritage property relates to how well it manifests its value, and the setting of a property can contribute to authenticity in facilitating the way the property is understood. In the case of Blenheim, the setting provides an understanding of the status given to Blenheim Palace as part of an estate, and its socioeconomic relationship with the surrounding communities. Moreover, it is a landscape that still has the capacity to reflect its history.

In ICOMOS' view, the wider estate needs to be protected as a cultural unit and protected overall as the wider setting of Blenheim. Within the estate boundary, a smaller area surrounding the palace that unites the various settlements needs to be given greater protection as the immediate setting. For both the wider and immediate setting there needs to be a clear understanding of the limits of change.

## 5. Protection of the setting

Whether or not a buffer zone is delineated, there is still an obligation to define and protect the setting and wider setting of a World Heritage property, as defined in the *Operational Guidelines for the Implementation of the World Heritage Convention* in relation to the way they provide a link between the property and the social, economic and other aspects of its geo-cultural context.

*“Effective management involves a cycle of short, medium and long-term actions to protect, conserve and present the nominated property. An integrated approach to planning and management is essential to guide the evolution of properties over time and to ensure maintenance of all aspects of their Outstanding Universal Value. This approach goes beyond the property to include any buffer zone(s), as well as the wider setting. **The wider setting may relate to the property’s topography, natural and built environment, and other elements such as infrastructure, land use patterns, spatial organization, and visual relationships. It may also include related social and cultural practices, economic processes and other intangible dimensions of heritage such as perceptions and associations. Management of the wider setting is related to its role in supporting the Outstanding Universal Value. Its effective management may also contribute to sustainable development, through harnessing the reciprocal benefits for heritage and society.”** (Operational Guidelines, Par. 112, ICOMOS’ emphasis)*

The difficulty this Inquiry faces is that this immediate and wider setting have not been clearly defined nor given the necessary protection they should have.

In relation to the NPPF, the following comments by the Rt Hon Robert Jenrick MP, Secretary of State for Housing, Communities and Local Government, in a letter dated 16 August 2021 to Sir Oliver Heald QC MP are relevant:

*“The National Planning Policy Framework expects local authorities to protect and enhance valued landscapes and sites of biodiversity and recognise the character and beauty of the countryside and the benefits of the best and most versatile farmland in their policies and decisions”, and “a number of proposals for solar farms in the countryside have been rejected*

*as causing visual harm, harm to amenity or harm to openness. [...] local authorities should protect all that we value in landscapes and natural capital, as indicated above”.<sup>6</sup>*

UNESCO’s Updating of the Policy Document on climate action for World Heritage, adopted in November 2023<sup>7</sup>, makes it very clear that climate mitigation is essential, but its implementation must respect Outstanding Universal Value:

*“In any case, Outstanding Universal Value must be safeguarded, and climate action must be pursued’ and ‘many properties have already demonstrated how management systems that engage with local communities can strengthen natural, cultural and social resilience and offer sustainable futures. In order to better respond to climate change, these approaches should be expanded to ensure that all properties are linked to their wider settings and efforts are linked to wider national and international efforts to combat climate change, while protecting Outstanding Universal Value”.*

What this Policy stresses is that climate change mitigation projects cannot be seen to have higher value than Outstanding Universal Value, that linking properties to their landscape settings is crucial, and that collaborative efforts are needed to ensure projects related to climate change mitigation emerge as a result of cooperation so as to respect Outstanding Universal Value.

The current Botley West Solar Farm project does not appear to reflect an agreed collaborative approach for siting a solar farm in ways that can be seen to respect Outstanding Universal Value.

What also needs to be recalled is that the 2022 UNESCO/ ICOMOS/ ICCROM/ IUCN *Guidance and Toolkit on Impact assessments in a World Heritage Context* makes it clear that harm to Outstanding Universal Value cannot be mitigated by benefits, such as climate mitigation benefits, however great these may be deemed to be.

## **6. Impact of the solar farm on the setting and on the property’s Outstanding Universal Value**

In terms of the potential impact of the solar farm on the Outstanding Universal Value of the property, ICOMOS considers that the proposals as currently defined would in effect sever the connection between Blenheim Palace and its estate in terms of historical continuity and how the estate provides the essential geo-cultural context for the Palace and explains its history and rationale. The estate would no longer be seen to maintain its integrity as an agricultural landscape – it would become partly an industrial landscape, which could harm the way it contributes to an understanding of Blenheim Palace World Heritage property and its Outstanding Universal Value. Moreover, the landscape itself has high aesthetic qualities that strengthen its connection with the Palace and reflect the symbiotic relationship.

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<sup>6</sup> This letter is referred to in a number of documents, including:

- [https://assets.publishing.service.gov.uk/media/641ad322e90e0769f093288d/Kate\\_Aldridge\\_Protect\\_the\\_Pelhams\\_-\\_Objection\\_to\\_Pelham\\_Spring\\_Solar\\_Farm\\_Redacted.pdf](https://assets.publishing.service.gov.uk/media/641ad322e90e0769f093288d/Kate_Aldridge_Protect_the_Pelhams_-_Objection_to_Pelham_Spring_Solar_Farm_Redacted.pdf)
- [https://assets.publishing.service.gov.uk/media/631b44a98fa8f5020ac91012/Protect\\_the\\_Pelhams\\_1\\_Redacted.pdf](https://assets.publishing.service.gov.uk/media/631b44a98fa8f5020ac91012/Protect_the_Pelhams_1_Redacted.pdf)
- <https://www.cpreherts.org.uk/wp-content/uploads/sites/30/2021/10/The-Problem-with-Solar-Farms.pdf>

<sup>7</sup> <https://whc.unesco.org/en/climatechange/#glossary>.

A key issue is whether a smaller overall project with discrete areas of solar panels might be accommodated. However, in order to understand where and how such installations might be inserted so as not to compromise the structure, coherence and integrity of the overall rural landscape, the setting needs to be fully surveyed to characterize its morphology in order to allow an understanding of precisely where these areas might be sited.

In ICOMOS' view, it is unfortunate that such a survey was not undertaken in advance of the Inquiry as a baseline for assessing impact, as was advised by ICOMOS in February 2024.

ICOMOS notes that the Inquiry is considering the possibility of further detailed work being undertaken to allow some aspects of the scheme to be improved, such as removing areas near dwellings. While this is essential, in ICOMOS' view other parameters also need to be considered, including those relating to the impact of the solar panels on the overall integrity of the rural landscape of the estate, which is the setting of Blenheim Palace World Heritage property.

ICOMOS considers that a detailed analysis of the setting would allow parameters to be defined to allow delineation of which areas might accommodate solar panels, in relation not only to visibility from dwellings, but also to the overall intactness of the estate landscape and its legibility, and thus whether a smaller and more fragmented scheme might be acceptable and could be seen to support Outstanding Universal Value.

## **7. Conclusions**

ICOMOS advises against the approval of the Botley West Solar Farm project in the absence of a thorough understanding of the role the estate plays in providing the setting of the Blenheim Palace World Heritage property, and without a detailed analysis of that setting, which could provide clear parameters for assessing the cumulative impact of the scope and scale of the project on the Outstanding Universal Value of the property as a means to assessing whether a smaller and more fragmented scheme might be acceptable that could be seen to support Outstanding Universal Value.

ICOMOS would like to recall that it has previously advised of the need to address the issue of cumulative impacts of various development projects, including the Botley West Solar Farm, as this is a requirement set out in the *Operational Guidelines for the Implementation of the World Heritage Convention*. This is amplified in the *2022 Guidance and Toolkit for Impact Assessments in World Heritage Context*, which sets out that: "proposed action should be assessed within its larger context and not in isolation. Multiple projects of the same type, or a combination of different projects over time, may cause cumulative impacts which compound the impacts of an individual proposed action."

ICOMOS remains available to the State Party to provide further guidance on whether, and if so how, a revised scheme might be envisaged that meets some of the climate and energy goals of the State Party, while safeguarding the Outstanding Universal Value of the Blenheim Palace World Heritage property.

ICOMOS, Charenton-le-Pont  
November 2025

### **Context of the Technical Review**

On 20 October 2025, the World Heritage Centre forwarded a letter to the State Party which included an overview of the history of the review of the Botley West proposal, which goes back to 2024 and includes two past ICOMOS Technical Reviews (February 2024 and August 2025). The letter from the World Heritage Centre also included, as an annex, a text from ICOMOS in which it requested clarifications from the State Party regarding:

- Whether any work on Landscape Character Assessment, the scope and role of the setting in supporting Outstanding Universal Value has been undertaken, as advised by ICOMOS in its February 2024 Technical Review;
- Clarification of submission deadlines and the State Party's internal review process;
- How ICOMOS responses will be relevant to the State Party's ongoing planning procedure, given that Historic England have already made their position clear to the Examining Authority;
- The basis for adjustment to the Botley West Solar Park project proposed by Historic England (removal of a number of fields from the proposed project);
- How ICOMOS' further advice will be entered into consideration by the State Party.

On 23 October 2025, the State Party responded to the World Heritage Centre's letter dated 20 October 2025, clarifying that:

- A Landscape Character Assessment contributes to the Environmental Statement that was produced by the Applicant and is taken into account as part of the HIA, including in the:
  - Chapter 8 Landscape and Visual Impact Assessment (Rev1) Section 8.4,
  - Appendix 8.1 Landscape Character,
  - Appendix 8.2 Landscape Value,
  - Associated figures,
  - Heritage Impact Assessment (Rev1);
- A Landscape Character Assessment contributed to the Setting Study (Annex III) of the 2017 Management Plan.

The State Party also noted that, while Historic England has completed its own assessment of the scheme, the Examining Authority is interested in understanding ICOMOS's position as an Advisory Body to the World Heritage Committee.

The State Party requested that any further comments from ICOMOS be submitted in advance of Deadline 7 (10 November 2025), and confirmed that any final comments from ICOMOS will be shared with the Examining Authority, as set out in the State Party's 19 September 2025 notification.