

Botley West Solar Farm

STATEMENT OF COMMON GROUND -

Historic England

EN01047/APP/11.7/4

10 November 2025

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Approval for issue

Jon Alsop 10 November 2025

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Photovolt Development Partners GmbH, on behalf of SolarFive Ltd.

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SIGNATURES

This Statement of Common Ground has been prepared and agreed by SolarFive Ltd and Historic England.

HISTORIC ENGLAND



Team Leader Development Advice Historic England 10 November 2025

PDVP on behalf of SolarFive



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10 November 2025

1 Introduction

1.1 DCO Reference

1.1.1 EN010147/APP/11.7/4

1.2 Date of Examination

1.2.1 May 2025 - November 2025

1.3 Proposed Development

- 1.3.1 The Applicant is seeking development consent for Botley West Solar Farm (the 'Project'), which in summary will comprise the construction, operation, maintenance and decommissioning of a photovoltaic ('PV') solar farm and associated infrastructure with a total capacity exceeding 50 megawatts ('MW'), in parts of West Oxfordshire, Cherwell and Vale of White Horse districts. The Project will export electricity for connection to the National Grid at Botley West.
- 1.3.2 The Project is classed as a 'nationally significant infrastructure project' ('NSIP') for the purposes of the Planning Act 2008 (PA 2008) and requires an application for a DCO. The application for development consent is being submitted to the planning inspectorate ('PINS'), with the decision on whether to grant a DCO to be made by the Secretary of State for Energy Security and Net Zero (the 'Secretary of State'), as required under the PA 2008.
- 1.3.3 This Statement of Common Ground (SoCG) has been prepared to accompany the DCO application made to the Secretary of State under section 37 of the PA 2008 for the proposed Project. The Application has been submitted by SolarFive Ltd (the Applicant).
- 1.3.4 A Location Plan (Rev 1) can be found in the Examination Library at **[CR2-055]** and a full description of the Project can be found at ES Chapter 6 Project Description **[APP-043]**.

1.4 Statement Overview

- 1.4.1 This Statement of Common Ground ('SoCG') is a final draft for signing. It comprises a record of discussions and where required, consultation with the relevant SoCG organisation to date as appropriate, and represents the ongoing nature of these discussions throughout the Examination period.
- 1.4.2 This SoCG has been prepared between (1) the Applicant and (2) Historic England (jointly referred to as the Parties).
- 1.4.3 Historic England is more formally known as the Historic Buildings and Monuments Commission for England. They are the government's statutory adviser on all matters relating to the historic environment, including world heritage. It is their duty under the provisions of the National Heritage Act 1983 (as amended) to secure the preservation and enhancement of the historic environment. Historic England also has a role in advising Government in relation to World Heritage Sites and implementation of the 1972 UNESCO

Convention Concerning the Protection of the World Cultural and Natural Heritage (the 1972 Convention).

- 1.4.4 An overarching Statement of Commonality (Rev 1) [REP3-042] has been submitted alongside this document and should be referred to in conjunction with this SoCG.
- 1.4.5 The Examining Authority has requested that the SoCGs include the following matters as set out in the Rule 6 letter [**PD-006**] as relevant:
 - Methodology for environmental assessments:
 - Data collection methods;
 - Baseline data:
 - Data/statistical analysis, approach to modelling and presentation of results;
 - Expert judgements, assumptions and worst case scenario;
 - Assessment of alternatives:
 - Design development;
 - Identification and sensitivity of relevant features and receptors;
 - Construction and operational effects;
 - Embedded and additional mitigation;
 - · Cumulative effects and mitigation; and
 - Relevant wording in the draft Development Consent Order (dDCO).
- 1.4.6 This was an indicative list of the suggested contents of SoCGs. This SoCG will pick up those matters that have been the subject of discussion between the Parties and are as recorded below.
- 1.4.7 For the avoidance of doubt, this refers to the historic environment topic and those aspects which Historic England has focused on in its submission. These are the Blenheim Palace World Heritage Site, the Blenheim Palace Registered Park and Garden, the Sansom's Platt scheduled monument and the churches of St Peter and St Paul at Church Hanborough, St Peter at Cassington and St Michael at Begbroke. For all other aspects covered in the historic environment topic, Historic England would refer to the submissions made by the Local Planning Authorities.
- 1.4.8 This statement addresses the following areas of common ground in relation to the Applicant Project Team's engagement with Historic England to date:
 - a. Relevant submission documents and plans
 - Record of relevant correspondence to date
 - c. Matters that are agreed
 - d. Matters yet to be agreed
 - e. Matters that are not agreed

2 Relevant Submissions Documents and Plans

2.1.1 A list of DCO documents and plans of relevance in discussions with Historic England is identified in the table below for ease of reference. Additional documents will need to be added as the examination proceeds.

Table 2.1: Draft DCO submission documents and plans record pursuant to Historic England discussions – Historic Environment

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.2	ES Non-Technical Summary	APP-037	November 2024
EN010147/APP/6.3	ES Volume 1, Chapter 7: Historic Environment	CR2-019	Rev 3/September 2025
EN010147/APP/6.5	ES Volume 3, Appendix 7.1: Historic environment desk-based assessment	APP-131	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.2: Assessment of airborne remote sensing and satellite imagery for archaeology	APP-132	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.3: Geophysical survey report, Parts 1-8	APP-133 – APP- 140	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment	CR2-036	Rev 1/September 2025
EN010147/APP/6.5	ES Volume 3, Appendix 7.5: Settings Assessment	CR2-038	Rev 3/September 2025
EN010147/APP/6.5	ES Figures 2.1a – 2.4c – Illustrative Masterplan	CR2-026	Rev 2/September 2025
EN010147/APP/6.5	ES Figures 8.248 - 8.371 - Photomontages (Winter and Summer)	CR2-032	Rev 2/September 2025
EN10147/APP/7.6.5	Outline Written Scheme of Investigation	CR2-053	Rev 3/September 2025
EN10147/APP/12.7	Additional Photomontages for Historic Environment Assessment	CR2-059	Rev 1/September 2025
EN010147/APP/6.3	ES Volume 1, Chapter 20: Cumulative Effects and Inter- relationships	REP5-022	Rev 1/September 2025
EN010147/APP/6.5	ES Figure 8.8 – ZTV Section Overlaps (Whole Project Overview)	APP-083	November 2024
EN010147/APP/6.5	ES Figures 8.9 – 8.11 Representative Viewpoints and Photomontage Locations	APP-085	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 6.1: Project Mitigation Measures and Commitments Schedule	REP4-014	Rev 1/August 2025

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN10147/APP/7.6.3	Outline Landscape and Ecology Management Plan	REP6-034	Rev 6/October 2025
EN10147/APP/3.1	Draft Development Consent Order	REP6-004	Rev 8/October 2025
EN10147/APP/7.6.2	Outline Operational Management Plan	REP6-032	Rev 5/October 2025
EN10147/APP/761	Outline Code of Construction Practice Part 1	REP6-028	Rev 5/October 2025
EN10147/APP/761	Outline Code of Construction Practice Part 2	REP6-030	Rev 5/October 2025
EN010147/APP/17.11	Archaeological Evaluation Report by Cotswold Archaeology – Parts 1 to 8	REP6-055 to REP6-062	October 2025
EN010147/APP/17.12	Archaeological Evaluation Report by Wessex Archaeology	REP6-063	October 2025

3 Record of Relevant Correspondence

- 3.1.1 The Project has been the subject of pre-application engagement with Historic England up to the submission of the DCO application for the Project.
- 3.1.2 **Appendix A** identifies the correspondence and engagement that has taken place between the Applicant's project team and Historic England up to the submission of the application.

4 Matters That Are Agreed

Table 4.1: Record of Matters of Specific Agreement to Date – Historic Environment

Ref	Relevant Application Document	Summary Description of Matter	Historic England Current Position	Applicant Current Position	Status
4.1.1	ES Appendix 7.1: Historic environment desk-based assessment [APP-131] and ES Appendix 7.2: Assessment of airborne remote sensing and satellite imagery for archaeology [APP-132]	Baseline data collection.	Historic England has focused on particular designated heritage assets in our Relevant and Written Representations. These are: Blenheim Palace World Heritage Site; Blenheim Palace (grade I); Blenheim Palace Registered Park and Garden (grade I); Sansom's Platt Roman Villa scheduled monument; Church of St Peter and St Paul, Church Hanborough (grade I); Church of St Peter, Cassington (grade I), and Church of St Michael, Begbroke (grade II*). In relation to these assets, it is agreed that the desk-based methodology for the establishment of the historic environment baseline is acceptable.	The desk-based methodology for the establishment of the historic environment baseline is acceptable.	Agreed
4.1.2	ES Appendix 7.1: Historic environment desk-based assessment [APP-131]	Designated heritage assets.	Historic England has focused on particular designated heritage assets in our Relevant and Written Representations. These are: Blenheim Palace World Heritage Site; Blenheim Palace (grade I); Blenheim Palace Registered Park and Garden (grade I); Sansom's Platt Roman Villa scheduled monument; Church of St Peter and St Paul, Church Hanborough (grade I); Church of St Peter, Cassington (grade I), and Church of St Michael, Begbroke (grade II*). In relation to these assets, it is agreed that the identification of these designated heritage assets within the defined study area is acceptable.	The identification of designated heritage assets within the defined study area is acceptable.	Agreed
4.1.3	ES Chapter 7: Historic environment [CR1-003]	The level of harm to the significance of designated heritage assets.	Historic England has focused on particular designated heritage assets in our Relevant and Written Representations. These are: Blenheim Palace World Heritage Site; Blenheim Palace (grade I); Blenheim Palace Registered Park and Garden (grade I);	All harm to the significance of those designated heritage assets considered by Historic England is less than substantial, therefore the correct policy test is the one set out in paragraph 5.9.32 of NPS EN-1.	– Agreed

Ref	Relevant Application Document	Summary Description of Matter	Historic England Current Position	Applicant Current Position	Status
			Sansom's Platt Roman Villa scheduled monument; Church of St Peter and St Paul, Church Hanborough (grade I); Church of St Peter, Cassington (grade I), and Church of St Michael, Begbroke (grade II*). Insofar as these assets are concerned, all harm to their significance is less than substantial, although we differ with the applicants on the level of harm in that context.		
4.1.4	ES Volume 1, Chapter 7: Historic environment (Rev 3) [CR2- 019]	The scope of the assessment.	The scope of the ES is acceptable in relation to the designated heritage assets Historic England has focused on in our Relevant and Written Representations. These are: Blenheim Palace World Heritage Site; Blenheim Palace (grade I); Blenheim Palace Registered Park and Garden (grade I); Sansom's Platt Roman Villa scheduled monument; Church of St Peter and St Paul, Church Hanborough (grade I); Church of St Peter, Cassington (grade I), and Church of St Michael, Begbroke (grade II*).	The scope of ES Volume 1, Chapter 7: Historic environment [CR1-003] has been developed with reference to comments received following submission of the Scoping Report and the PEIR, and is acceptable.	Agreed
4.1.5	ES Volume 1, Chapter 7: Historic environment (Rev 3) [CR2- 019], ES Appendix 7.1: Historic environment desk-based assessment [APP-131] and ES Appendix 7.4: Heritage Impact Assessment (Rev 1) [CR2- 036].	Technical guidance.	Various guidance has been referenced in documentation submitted. However, Historic England advised the Applicant that they had not referenced a full suite of guidance documents in their submission documents. This remains the case. Whilst Historic England and the Applicant disagree on this matter, both parties agree that this is something that the Examining Authority can come to a view on.	The Applicant notes that there are some guidance documents advised by Historic England that have not been referenced by the Applicant in their submission documents, particularly with reference to the consideration of impacts on the WHS. In some cases, these documents have been referenced in oral submissions (eg. the Operational Guidelines for the Implementation of the World Heritage Convention). Given that the assessment presented in ES Appendix 7.4: Heritage Impact Assessment (Rev 1) [CR2-036] found that the proposed development would not result in any harm to the OUV of the WHS, the Applicant considers that the assessment is proportionate and robust. Whilst Historic England and the Applicant disagree on this matter, both parties agree that this is something that the Examining Authority can come to a view on.	Agreed

Ref	Relevant Application Document	Summary Description of Matter	Historic England Current Position	Applicant Current Position	Status
4.1.6	ES Chapter 7: Historic environment (Rev 3) [CR2- 019], ES Appendix 7.4: Heritage Impact Assessment (Rev 1) [CR2- 036] and ES Appendix 7.5: Settings Assessment (Rev 3) [CR2- 038].	Assessment methodology for Blenheim Palace WHS.	In relation to the assessment methodology for the Blenheim WHS we note improvements to the assessment by the applicant throughout the course of the examination. However it continues to fall short of the standard set by UNESCO. The applicant has confirmed they have used a different methodology which is based on the guidance issued by the Planning Inspectorate in 2024. ICOMOS and HE employed UNESCO's 2022 methodology from the UNESCO toolkit in relation to the WHS, which sets the baseline for assessing impact on OUV is set at the time of inscription, not based on if the scheme is proposed. Whilst Historic England and the Applicant disagree on the assessment methodology to be used, both parties agree that this is a matter that the Examining Authority can come to a view on.	The methodology used for the assessment of likely impacts and effects is acceptable. A revised version of ES Appendix 7.4: Heritage Impact Assessment – Blenheim Palace World Heritage Site (Rev 1) [CR2-036] was submitted in response to the changes set out in the Applicant's Change Request 2 Notification [REP2-045]. This assessment was based on the methodology set out in the 2022 guidance issued by UNESCO (Guidance and Toolkit for Impact Assessments in a World Heritage Context). The Applicant's cumulative effects assessment is presented in ES Chapter 7: Historic Environment (Rev 3) [CR2-019]. This was undertaken in line with guidance issued by the Planning Inspectorate (Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment), thus any residential developments around Woodstock that are already constructed are treated as part of the baseline and not included within the cumulative effects assessment. Whilst Historic England and the Applicant disagree on the assessment methodology to be used, both parties agree that this is a matter that the Examining Authority can come to a view on.	Agreed
4.1.7	ES Chapter 7: Historic environment (Rev 3) [CR2- 019]	Assessment conclusions for Blenheim WHS	Historic England has drawn different conclusions from its own assessment of the potential impact on the World Heritage property's OUV. Historic England has identified that there is potential for several of the property's attributes to be affected by the proposed scheme as explained in our Written Representations (e.g. REP1-086 5.12-13, 5.24-5.31), including in relation to the ability to appreciate them from within its setting. In contrast, the HIA concludes that only attribute 7 has potential to be affected. Whilst Historic England and the Applicant disagree on the assessment conclusions to be used, both parties agree that this is a	A revised version of ES Appendix 7.4: Heritage Impact Assessment – Blenheim Palace World Heritage Site (Rev 1) [CR2-036] was submitted in response to the changes set out in the Applicant's Change Request 2 Notification [REP2-045]. This responds to the second Technical Review issued by ICOMOS International. The Applicant maintains their position that only Attribute 7 is concerned with the setting of the WHS, and that Attributes 1, 4 and 5 are concerned only with the WHS itself and not its setting. Whilst Historic England and the Applicant disagree on the assessment conclusions to be used, both parties agree that this is a matter that the Examining Authority can come to a view on.	Agreed

Ref	Relevant Application Document	Summary Description of Matter	Historic England Current Position	Applicant Current Position	Status
			matter that the Examining Authority can come to a view on.		
4.1.8	Draft DCO (Rev 8) [REP6-004]	Discharge of Requirements.	Historic England has agreed with the Applicant the appropriate wording in relation to Requirements 5, 6, 8 and 12 in Schedule 2 of the draft DCO. This would provide that Historic England is a consultee in the discharge of certain requirements. This agreed wording is set out in the draft DCO (Rev 8) which was submitted at Deadline 6.	The Applicant and Historic England have agreed appropriate wording in the draft DCO with regard to the involvement of Historic England as a consultee in the discharge of certain Requirements. This agreed wording is set out in the draft DCO (Rev 8) which was submitted at Deadline 6 [REP6-004].	- Agreed
4.1.9	Additional Photomontages for Historic Environment Assessment (Rev 1) [CR2- 059] Outline Code of Construction Practice (Rev 5) [REP6-028 and REP6-030]	The visibility of the proposed development from within the Blenheim Palace World Heritage Site.	We have received additional visualisations, which indicates that the solar development should not be visible from within the WHS. The Applicant has also provided further information and clarity with regards to the cable routes and lighting. As a consequence of this additional information, we are content that measures are set out in the Outline Code of Construction Practice regarding this.	No part of the Project would be visible from any location within the Blenheim Palace World Heritage Site. Additional information has been provided with regard to cable routes and construction lighting.	Agreed
4.1.10	Outline Landscape and Ecology Management Plan (Rev 6) [REP6-034]	Public Rights of Way	As set out within Historic England's Written Representations (REP1-086 5.91), one such example of better integration would be in relation to the Public Right of Ways (PROW). We considered expanding the width of the PROW through the fields with the solar development where designated heritage assets, in this case St Michael, Begbroke (grade II*: NHLE 1291232), can be experienced would help mitigate some of the impact. Rev 5 of the OLEMP (CR2-051) proposes the establishment of greenways on the alignment of PROW's. Although the locations and design are indicative at this stage, Historic England welcomes that this is to be dealt with in the detailed design stage, noting that we will be a consultee in	Rev 5 of the Outline Landscape and Ecology Management Plan (oLEMP) was submitted into the Examination as part of the CR2 suite of documents [CR2-051]. It contains references to the establishment of 'greenways' which could be existing PRoWs or new permissive routes. Figures 7.6.3.2A to 7.6.3.2L provide indicative layouts showing how these greenways could look in plan and in section. A new drawing was added to the next revision of the oLEMP which was submitted at D6 [REP6-034]. It shows the indicative locations of the proposed greenways and includes the footpath which leads towards the Church of St Michael at Begbroke. The Applicant is not committing to surfacing all or any of these routes, as the design will depend on the individual nature of each route and the development of these during	Agreed

Ref	Relevant Application Document	Summary Description of Matter	Historic England Current Position	Applicant Current Position	Status
			relation to Requirement 5 which relates to detailed design.	the detailed design phase, in which Historic England is a named consultee.	
4.1.11	ES Appendix 7.5: Settings Assessment (Rev 3) [CR2- 038]	The likely magnitude of impact (of the Project) on the significance of the Scheduled Monument at Sansom's Platt.	Historic England consider that the likely magnitude of impact is greater than negligible. In our view the impact would be low adverse in EIA terms, notwithstanding the removal of panels from Field 1.13 as referenced in line 5.1.16 below. Whilst Historic England and the Applicant disagree on the likely magnitude of impact, both parties agree that this is a matter that the Examining Authority can come to a view on.	The Applicant has assessed the likely magnitude of impact as negligible adverse, leading to a long-term, reversible minor adverse effect. Whilst Historic England and the Applicant disagree on the likely magnitude of impact, both parties agree that this is a matter that the Examining Authority can come to a view on.	Agreed
4.1.12	ES Appendix 7.5: Settings Assessment (Rev 3) [CR2- 038]	The likely magnitude of impact (of the Project) on the significance of the Grade I listed Church of St Peter and St Paul at Church Hanborough.	Historic England consider that the likely magnitude of impact is greater than negligible, at low adverse. Whilst Historic England and the Applicant disagree on the likely magnitude of impact, both parties agree that this is a matter that the Examining Authority can come to a view on.	The Applicant has assessed the likely magnitude of impact as negligible adverse, leading to a long-term, reversible minor adverse effect. Whilst Historic England and the Applicant disagree on the likely magnitude of impact, both parties agree that this is a matter that the Examining Authority can come to a view on.	Agreed
4.1.13	ES Appendix 7.5: Settings Assessment (Rev 3) [CR2- 038]	The likely magnitude of impact (of the Project) on the significance of the Grade I listed Church of St Peter at Cassington.	Historic England consider that the likely magnitude of impact is greater than negligible at low adverse. Whilst Historic England and the Applicant disagree on the likely magnitude of impact, both parties agree that this is a matter that the Examining Authority can come to a view on.	The Applicant has assessed the likely magnitude of impact as negligible adverse, leading to a long-term, reversible minor adverse effect. Whilst Historic England and the Applicant disagree on the likely magnitude of impact, both parties agree that this is a matter that the Examining Authority can come to a view on.	Agreed
4.1.14	ES Appendix 7.5: Settings Assessment (Rev 3) [CR2- 038]	The likely magnitude of impact (of the Project) on the significance of the Grade II* listed Church of St Michael at Begbroke.	Following Change Request 2 Historic England maintains the position that the likely magnitude of impact is greater than negligible at low adverse. Whilst Historic England and the Applicant disagree on the likely magnitude of impact, both parties agree that this is a matter that	The Applicant has assessed the likely magnitude of impact as negligible adverse, leading to a long-term, reversible minor adverse effect. Whilst Historic England and the Applicant disagree on the likely magnitude of impact, both parties agree that this is a matter that the Examining Authority can come to a view on.	Agreed

Ref	Relevant Application Document	Summary Description of Matter	Historic England Current Position	Applicant Current Position	Status
			the Examining Authority can come to a view on.		
4.1.15	Archaeological Evaluation Report by Cotswold Archaeology – Parts 1 to 8 [REP6-055 to REP6-062]	Assessment of the trial trenching report.	Historic England has reviewed the trial trenching reports for Sansom's Platt. In discussion with the Applicant, prior to Deadline 7, the Applicant has agreed to submit an updated Works Plans which removes Works 1, 6 and 8 from Field 1.13. We are in agreement with the applicant for the extension of the archaeological buffer zone by removing solar panels from field 1.13 with the proviso that the updated Works Plan is to be submitted at Deadline 7.	The Applicant made this draft report available to Historic England at the earliest opportunity and submitted it into the Examination at Deadline 6. Subsequently the Applicant has held further discussions with Historic England regarding the extent of the proposed archaeological buffer zone around the Scheduled Monument at Sansom's Platt. The outcome of these discussions is that the Applicant has agreed to remove all solar pv panels and associated infrastructure from Field 1.13 which is to the south-west of the Scheduled Monument. The relevant part of Sheet 3 of the Works Plans will be updated for submission at Deadline 7. The whole of the field will be marked solely as Works No. 5. There would no longer be any requirement to place the 33kV cable in this field with the HDD crossing (into Field 1.14 at the south-east corner) – the 33kV cables can now go into the 275kV cable corridor, both options for this corridor are well to the east of the Scheduled Monument.	Agreed
				A note explaining this adjustment to the proposed archaeological buffer zone will be included within the Covering Letter for the Applicant's Deadline 7 submissions.	
				The extent of the proposed archaeological buffer zones in Fields 1.11, 1.12 and 1.14 would remain unchanged.	
				The Applicant considers that the removal of solar pv panels and associated infrastructure from Field 1.13 ensure the protection of all buried archaeological remains associated with the Scheduled Monument at Sansom's Platt, and also further reduces any impact on the Scheduled Monument as a result of the change within its setting.	

Matters Yet to be Agreed 5 There are no matters that are yet to be agreed.

6	Matters That Are Not Agreed	
There a	e no matters that are not agreed.	

Appendix A Record of Relevant Correspondence and Engagement

Date	Record of Relevant Correspondence and Engagement	Topics Discussed
December 2022	Letter from Historic England in response to request for pre- applicant advice	Various
July 2023	Historic England input into Scoping Opinion	Various
January 2024	Meeting	The content and format of the Preliminary Heritage Impact Assessment
February 2024	Historic England response to PEIR	Various
March 2024	Email Correspondence	The circulation of the ICOMOS Technical Reviews
July 2024	Meeting	The content and format of the updated Heritage Impact Assessment.
August 2024	Letter from Historic England	Further advice regarding the content and format of the updated Heritage Impact Assessment
September 2024	E-mail correspondence	Agreement of viewpoints for additional visualisations to assist the assessment of likely impacts and effects on heritage assets.
November 2024	Meeting	Visit to the Blenheim Palace WHS and the Project Site by the Historic England Advisory Committee (HEAC).
13 December 2024	Planning Inspectorate letter accepting examination	n/a