

Mr John Wheadon
Department of Energy Security and Net Zero
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London
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Our ref: PL00794649

Your ref: EN010147

Telephone: [REDACTED]

Date: 9th June 2026

Dear Mr Wheadon,

Application by Photovolt Development Partners (“the Applicant”) for an Order granting Development Consent for the proposed Botley West Solar Farm (“the Proposed Development”)

Re Letter from Secretary of State dated 14 April 2026

Thank you for your letter which was published on 14 April. We note that the Secretary of State republished amended letters on 20 April and 28 April, however there were no material changes to the questions and the deadline for response remained 9 June.

As set out in your letter, under the Cultural Heritage heading, you directly referred to Historic England in the following paragraphs:

Paragraph 18. The Secretary of State encourages early engagement between the Applicant and Historic England as part of any update to the (Heritage Impact) assessment.

and

Paragraph 22. In relation to the scheduled monument at Sansom’s Platt, Historic England is requested to confirm that the updated Works Plans submitted by the Applicant at Deadline 7 [REP7-004] are in line with their recommendation to remove solar panels from field 1.13 and that they are content that the impacts to the scheduled monument at Sansom’s Platt has been adequately addressed.

Historic England’s response to Paragraph 18 of the Secretary of State’s letter

1. Following publication of the Secretary of State’s (SoS) letter dated 14 April, Historic England contacted the Applicant on 20 April 2026 to initiate and encourage early

engagement regarding the heritage impact assessment (HIA). We heard from the Applicant's heritage consultant on 21 April that they were considering the matter. We were then asked if we could meet on 20 May. At this meeting Historic England requested that the Applicant share the updated HIA as soon as possible so that we could input to its revision in accordance with the Secretary of State's request. Historic England received a draft updated HIA on 22 May. Historic England provided detailed comments on the updated draft of the HIA to the Applicant on 29 May. Historic England has not seen any further revision to the document since we commented, so we are unaware if those comments have been adopted into the updated HIA.

Summary of Historic England's comments to the Applicant on its draft updated HIA

2. In commenting on the Applicant's draft updated HIA, Historic England addressed:
 - the changes made by the Applicant to their evolving draft,
 - the areas annotated in the draft by the Applicant as being under review to consider if further changes were required, and
 - areas of the draft where we considered changes were required to address points raised by the SoS in his letter of 28 April 2026, but where these had not yet been highlighted by the Applicant.
3. Historic England highlighted a number of primary considerations for the Applicant to take into account prior to submission to the SoS. These comprised:
 - updates to reflect changes to the scheme since the last HIA was submitted as part of Change Request 2. These include both factual changes (to describe the scheme and its extent and to update associated illustrations accordingly) and updates to the assessment, particularly to Tables 1.1 and 1.2 to reflect the amended scheme;
 - updates to ensure that the live and in force legislative and policy context for decision making was accurately presented in the HIA with key definitions (of OUV and significance) drawn from the NPPF;
 - updates to provide additional clarity regarding the criteria used to define how sensitivity levels were assessed in relation to attributes of OUV;
 - updates to address UNESCO's requirements regarding the assessment of cumulative impact with reference to the baseline at the point of inscription, to and provide additional clarity about the methodology used and explain the conclusions drawn;

- updates to address the conclusions set out in previous Appeal Decisions regarding how change within Blenheim’s setting can affect its OUV as well as its cumulative impact;
 - updates to address outstanding recommendations from Historic England in its Closing Statement (REP7-118) to the Examination; and
 - a number of edits to address omissions and factual corrections to references to specific UNESCO documents, both Historic England and DCMS, to the content of the A303 Amesbury to Berwick Down Development Consent Order Appeal judgment, and to the information submitted to UNESCO as part of the Third Cycle of Periodic Reporting in 2023.
4. Historic England additionally provided further advice comprising suggestions with reference to use of UNESCO’s guidance (Guidance and Toolkit for Impact Assessments in a World Heritage Context, 2022), our own published guidance The Setting of Heritage Assets (GPA3) and our own review of the requests made by the Secretary of State regarding cultural heritage in his letter of 14 April (paragraphs 15-22). These comprised:
- recommended clarifications, particularly around the role, origin and definition of attributes and the way in which summarised lists are created from the SOUV for inclusion in the WHS Management Plan;
 - recommendations regarding implementation of the process of heritage impact assessment with reference to both UNESCO’s published guidance (the Operational Guidelines, and the Guidance and Toolkit for Impact Assessments in a World Heritage Context, 2022) and that from Historic England (GPA3);
 - corrections to misunderstandings about the relationship between a World Heritage property, its boundary and its setting – these comments addressed the ways in which setting can contribute to attributes of OUV, the ability to appreciate them, and to their conservation and management, with reference to UNESCO’s Operational Guidelines, Historic England’s GPA3 and the approach taken in the HIA;
 - recommendations to engage in more detail with the advice in GPA3 and applying it in practice in this WHS context;
 - recommendations regarding the approach to identifying attributes with potential to be affected by the proposed scheme, and inconsistencies in the HIA arising from some of the proposed edits which respond to Historic England’s Closing Statement (REP7-118);
 - recommendations to engage in further detail with the content of ICOMOS’ Technical Reviews and their findings and conclusions within the context of the HIA process,

and corrections to what we perceive as misunderstandings in that advice relating to technical detail and national process;

- recommendations regarding what we perceive as misunderstandings by the Applicant of the requests made by the SoS in his letter of 14 April with respect to the definition of intangible attributes of OUV;
- recommendations about how the HIA treats other heritage and conservation values, including communal value;
- further recommendations regarding the approach to cumulative impact taken in the HIA.

5. Historic England also offered some minor comments regarding clarification of the detail of the scheme and its impacts, as well as in relation to our signed Statement of Common Ground.

Historic England's response to Paragraph 22 of the Secretary of State's letter

6. In line with our recommendation (HE Closing Statement, para 2.77 (REP7-118)) Historic England can confirm that the Applicant has submitted an updated Works Plan which shows that Works 1, 6 and 8 have now been removed from Field 1.13.

As a consequence, Historic England is content that the impact to the monument, based on our evolved understanding of associated buried remains, has been adequately addressed.

Other matters

7. Historic England notes in the Secretary of State's letter various requests for the Applicant to consider providing further information/additional assessment in relation to cultural heritage. These requests are for the Applicant to:
 - consider whether an updated Settings Assessment considering the effects of the Proposed Development on the setting of heritage assets is required (paragraph 15).
 - consider and provide a response to all three ICOMOS technical reviews (paragraph 19)
 - consider whether updated assessments of the effects on the significance to the Roman Villa at Sansom's Platt, the Church of St Peter and St Paul, Church Hanborough, Church of St Peter, Cassington and Church of St Michael, Begbroke and Blenheim Palace WHS is required (paragraph 21).

- explain how the mitigation hierarchy has been applied in regard to landscape and visual, and cultural heritage impacts when developing the scheme (paragraph 23).
8. Should this additional information and updated assessments be submitted, Historic England remains ready to review these, and the updated HIA, and to provide further assistance and support as appropriate.

Yours sincerely,

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Inspector of Historic Buildings and Areas
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