



24 June 2026

Begbroke & Yarnton Green Belt Campaign (BYG)

BYG COMMENTS re APPLICANT'S RESPONSE to RFI QUESTION 19 re ICOMOS` s CONTRIBUTION to the BWSF EXAMINATION.

Begbroke & Yarnton Green Belt Campaign (BYG) was an active participant in the Examination by PINS of the Botley West Solar Farm (BWSF) which closed earlier this year. This included our engagement with the Applicant and other IPs in discussions about the impact of BW on the Blenheim Palace World Heritage Site (WHS).

1. BYG pointed out that the WHS designation arises from the UK's ratification in May 1984 of the Convention Concerning the Protection of the World Cultural and Natural Heritage (WHC), which had been adopted by the General Conference of UNESCO in November 1972. This is not just another planning designation; rather it confers on Blenheim Palace recognition that it is one of few places on earth that has Outstanding Universal Value, and that protecting it is a responsibility shared with the international community.

We suggested that the Applicant's attempt to trade away fields of panels hoping the ExA and SoS would find a level of impact with which they felt comfortable was wholly inappropriate in this international context. One could imagine that the World Heritage Centre, which is responsible for ICOMOS and its technical work and advice, felt concerned at such an approach. Indeed, one can read that concern in its submissions.

2. The Applicant's dismissive approach to ICOMOS` s opinion continues in the answers given to Question 19 in the RFI. The Applicant claims opinions which are different from those of ICOMOS but has omitted to reveal the source of those opinions. We must assume they come from the Applicant's consultants - who were seriously criticised by the ExA in regard to this, and related, issues. If the Applicant had engaged an international expert to give independent advice they would surely have said so.

The ICOMOS document submitted by Historic England (REP7-117) indicates without doubt that it does not believe the Application should be granted the DCO. It does not rule out a different scheme being acceptable because it is providing specific advice to the relevant State Party - the UK Government - about an international designation for which it has responsibility. Neither does it say, for the same reason, what that scheme might be, or how far from the WHS it would have to be located.

We would strongly suggest that the SoS should not reject the advice from the international body responsible for advising in respect of this matter; particularly if encouragement to do so stems from anonymous consultants engaged by a developer with a pecuniary interest in ICOMOS's advice being ignored.

3. Historic England acts as agent/conduit for ICOMOS's opinions regarding the government's international obligations. HE also carries responsibility for advising the government within the parameters of the UK planning system. These dual roles and the dilemmas they presented were fairly summarised in HE's Closing Statement (REP7-118; 5.9-5.11):

' Historic England remains aware of the difference of its own professional judgement to that of ICOMOS International. Our own assessment followed the approach set out by UNESCO in Guidance and Toolkit for Impact Assessment in a World Heritage Context. Our assessment also takes account of how the application site contributes to the significance and experience of the WHS, Grade I listed palace and registered park and garden in accordance with GPA3. '

' Historic England has been in dialogue with ICOMOS International regarding their assessment of the level of harm to the OUV of the WHS. ICOMOS' Third Technical Review has now been received by the State Party and shared with the Examining Authority for Deadline 7.5.11. 5.12. 5.13. 5.14. 5.15. '

' We have approached this application in relation to the English Planning System with reference to international policy and guidance. With this in mind, we have sought to be consistent in our approach to be holistic and appropriate and to do our best to ensure that what is proposed takes account of the OUV. The Examining Authority will need to carefully consider the ICOMOS Technical Reviews in their determination of this application. Ultimately it will be for the Examining Authority to determine based on the evidence submitted. '

In contrast to the Applicant, HE acted professionally by not attempting to undermine or challenge the ICOMOS view, and by not trying to influence the ExA in coming to its own conclusions.

Our understanding is that HE was suggesting to the ExA, and by inference the SoS, that the international position should take priority over national planning policy issues. In effect, this amounted to adopting a precautionary approach - rather than entering the debate and fine tuning of 'harm' which now characterises the planning system.

4. That approach has recently been corroborated by HE in relation to a planning application for housing on a site which would be surrounded by BW cables if permitted. BYG drew the ExA's attention to this site during the Examination and referred to it in our Closing Statement (REP7-057):

` 8.5 BE's pursuit of commercial return over the sure protection of the WHS's setting may be evidenced by its latest application to Cherwell DC (CDC) for 500 houses on the edge of the WHS (CDC: APP25/01510/OUT). This application was made during this Examination in June 2025, in the face of ICOMOS's expressed and detailed concern about the effect of housing development around Woodstock. ICOMOS specifically included this site in its February 2024 Technical Review (RR-1102, annex). HE has objected to this application in similar terms to the latest ICOMOS International Technical Review in relation to BWSF (REP4052/053). It has requested extensive additional evaluation to be done in respect of the setting of the WHS, because the analysis provided by Blenheim with the Application is deemed to be inadequate. HE's conclusions regarding this matter have been supported at the highest level by UNESCO. This application by BE underlines its commercial motivation, rather than a thoughtful, careful guardianship of a globally important asset (REP6-072). `

An amended Application was made by Blenheim Estate on 22 December 2025 with an analysis of its impacts. A response to this Application was quickly and efficiently made by HE, dated 30 January 2026. However, this response was only posted on the Cherwell DC planning portal on 25 June 2026. We have therefore only just been able to draw it to the SoS's attention. No explanation of why this took five months has been given by Cherwell DC. Other postings of a similar nature are normally done within a few days. A delay of this length undoubtedly prejudices the effective communication of a statutory consultee's views.

Those views on the importance of the opinion of the World Heritage Centre, and its technical arm ICOMOS, are found at the end of the letter in its

Recommendations:

` We consider that the safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 2, 212, 213 and 215 of the NPPF. `

` This application would cause harm to assets of the highest significance; Blenheim WHS, Blenheim RPG and Blenheim Roman Villa Scheduled Monument. Your council, in accordance with the NPPF, will need to be satisfied the harm to these highly designated heritage assets has been avoided and minimised and is clearly and convincingly justified. `

` Having now received the updated assessment, the Department for Culture, Media and Sport (DCMS) representing the UK State Party to the 1972 World

Heritage Convention will need to notify the World Heritage Committee, following the request from the World Heritage Centre in September 2025. We recommend that any decision on this application is deferred until a response from the World Heritage Centre and/or the advice of the World Heritage Committee's Advisory Bodies has been received, so that this can be taken into account in making your determination.`

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.`

As with Botley West, this recommendation clearly indicates HE`s belief that the WHC/ICOMOS view is essential to proper decision-making about this site, adjacent as it is to the Blenheim Palace WHS.

5. Again, we believe that the way this is expressed confirms HE`s recognition of the pre-eminence of the international perspective, understanding as it does the UK`s obligations under an international treaty. We suggest the SoS has no option but to agree with that position.

There is no reason the UK should risk its reputation as a guardian of World Heritage Sites for the international good. It cannot expect any help from PVDP in meeting that significant legal obligation. This is a small German company, funded from a company in Cyprus, which has stopped filing accounts, and which is owned by a Russian citizen with a distinctly dubious background.*

The SoS should consider whether other Governments with responsibility for WHS - such as Versailles and the Alhambra - would risk their OUV with inessential development. As we argued extensively in our evidence to the Examination, the process of locating solar farms generally offers many options. As we showed in our submission of 24 June 2026, many nationally significant solar farms are being developed and proposed in locations across the country that are nowhere near a WHS.

*[BYG`s RR-0092 and Rep1-095 detail the security risk and compromised funding stemming from this, indicating the need for further investigation. Our letter to Mr. Wheadon of 4 June 2026 in response to his RFI (EN101014) details the latest, related, legal developments in Russian court hearings.]