



BYG: *further* COMMENTS re APPLICANT'S RESPONSE to RFI QUESTION 19 in light of ICOMOS Technical Review, June 2026.

In our submission to the SoS dated 24 June (submitted 28 June) we drew attention to Historic England's response to Blenheim Estate's planning application for 500 houses - on a site which would be surrounded by cables that would be part of Botley West Solar Farm (CDC: APP25/01510/OUT).

1. We made the point that – before a decision was made on the Application – HE recommended that Cherwell District Council should await the view of the international body responsible for World Heritage Sites on the scheme's impact on the Blenheim WHS.

That opinion has now been delivered in a Technical Review from ICOMOS dated June 2026, which we attach to this submission. Its conclusion is unequivocal that *"planning permission be denied"*.

2. This is consistent with its advice in respect of Botley West. In examination document REP7-117 (7. Conclusions), it indicated *"ICOMOS advises against the approval of BWSF..."*.

Furthermore, on page 4, the latest review also indicates:

"ICOMOS advises, consistent with its past advice, that the process of weighing of harm against public benefit is not aligned with the State Parties commitment under the 1972 World Heritage Convention to preserve Outstanding Universal Value."

3. This undoubtedly supports the contentions we made in our submission dated 24 June and during the Examination, that the UK Government's obligations under the Convention cannot be considered as just another planning issue to be weighed in the balance.

It also confirms why HE has been careful to ensure that both the BW ExA and Cherwell DC take full regard of the Government's international obligations under the Convention. As explained in our submission, our interpretation of the way in which HE has done this indicates that it believes ICOMOS's view should have primacy when making judgements and decisions about development adjacent to WHS.

4. From the reviews ICOMOS has produced in respect of both BWSF and the houses proposed by Blenheim on Land South of Perdiswell Farm, we would conclude that granting permission for either would put the UK Government in breach of its obligations under the 1972 Convention.

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ICOMOS Technical Review

Property	Blenheim Palace
State Party	United Kingdom of Great Britain and Northern Ireland
Property ID	425
Date of inscription	1987
Criteria	(ii) (iv)
Project	Urban Expansion in setting of the property: Perdiswell Housing proposal

I. Introduction

On 6 February 2026, the State Party of the United Kingdom of Great Britain and Northern Ireland submitted a letter to the World Heritage Centre, under the provisions of paragraph 172 of the *Operational Guidelines for the Implementation of the World Heritage Convention*, in which it provided information about a planned development of a 48.8 ha greenfield site within the setting of the Blenheim Palace World Heritage property. The development, which proposes 500 single-family homes, is referred to as 'Land South of Perdiswell Farm, Shipton Road, Shipton on Cherwell' (National planning application system registration no. 25/01510/OUT).

The State Party submission includes:

- The State Party's notification letter (dated 6 February 2026), in accordance with paragraph 172 of the *Operational Guidelines*, outlining the process to date and context of the application;
- A letter from Historic England (dated 30 January 2026), outlining its assessment of the impacts the proposed development will have on the Outstanding Universal Value (OUV) of the Blenheim Palace World Heritage property and providing its recommendations;
- A cover letter from tor&co (dated 12 December 2025) regarding the project 'Land east of Park View (25/01510/OUT)';¹
- A document titled 'Amendments to the ES technical appendices' by tor&co (dated December 2025), and including a Heritage Impact Assessment (HIA) for the proposed development of a land parcel referred to as 'Land east of Park View';
- An annex to the aforementioned HIA, presenting visualisations.

The Advisory Body provides this Technical Review to assist the State Party with its commitment to preserve the OUV of the Blenheim Palace Heritage property, including through the application of a HIA process to inform decision-making. This Technical Review is not a peer-review of the HIA as a scientific study, but rather aims to provide guidance on whether the HIA provides useful information to ensure informed decision-making to guarantee the maintenance of the property's OUV.

II. Background

Blenheim Palace was inscribed on the World Heritage List in 1987, in Decision **11 COM VII.A**, on the basis of criteria (ii) and (iv).

¹ The project 'Land east of Park View' is the same project as the project 'Land South of Perdiswell Farm, Shipton Road, Shipton on Cherwell' noted in the State Party's paragraph 172 submission letter.

In 2008, the World Heritage Committee adopted a Statement of Significance for the property in its Decision **32 COM 8B.95**, and subsequently in 2013, a Retrospective Statement of Outstanding Universal Value (RSOUV) in Decision **37 COM 8E**.

In 2024, the World Heritage Committee adopted a proposal from the State Party for the clarification of the property's boundaries (Decision **45 COM 8D**).

The RSOUV for Blenheim Palace World Heritage property is available on the UNESCO website at: <https://whc.unesco.org/en/list/425/>.

III. Cumulative impact of projects in the immediate and wider setting of the World Heritage property

ICOMOS has since 2024 provided numerous Technical Reviews on project proposals that would affect the setting of the Blenheim Palace World Heritage property.

ICOMOS has consistently alerted to the significant contribution that the landscape setting of the Blenheim World Heritage property makes in supporting its OUV. ICOMOS has also consistently advised that the cumulative impacts of various project in the immediate and wider settings of the property could lead to a loss of the integrity of the property's OUV, and that cumulation should be assessed in any HIA undertaken for projects that may affect the property's OUV. In particular, in February 2024, ICOMOS provided a Technical Review in which it reviewed four proposed and partially approved urban development projects in the setting of the property, submitted by the State Party in response to a request under paragraph 174 of the *Operational Guidelines*. These include developments at Land East of Woodstock, Land East of Hill Rise, Land North of Banbury Road, and Land South of Perdiswell Farm. In its Technical Review, ICOMOS noted that, while two of the developments had already been granted planning permission, others remained undecided or had been withdrawn.

In the February 2024 Technical Review, ICOMOS also concluded that the approved projects had already led to a cumulative erosion of the property's rural setting and negatively affected its OUV, and warned that the remaining proposals - if granted - could intensify that harm. The Technical Review found that the current Management Plan and local planning framework did not sufficiently protect the property's setting, particularly in the absence of a buffer zone. In its conclusions, ICOMOS recommended that no further development in the setting be approved until a comprehensive Landscape Character Assessment is undertaken and a revised Management Plan is adopted.

IV. The project

The project proponent, Blenheim Estate Homes, has brought forward a project for the construction of 500 new homes within the immediate setting of the property on green-fields land that is used for agriculture. The project is proposed for a land allocation in the draft local plan. The proposal will expand the village of Woodstock, which has recently already seen new neighbourhoods added to its north-west and south-east. In both cases, these expansions have bordered on the World Heritage property's boundary.

In its February 2024 Technical Review on the Urban Expansion in the setting of the property, ICOMOS concluded, because of the potential threat the project would hold for the OUV of the property due to the conversion of its immediate setting from a predominantly rural to an urban character, that:

The two projects that have not yet been decided (Land North of Banbury Road and the Land South of Perdiswell Farm, Shipton Road, Shipton On Cherwell) may further constitute an erosion of the setting of the Outstanding Universal Value of the property and these and other such projects should therefore not be granted until:

- *Further studies into the contribution of the setting of the property to the maintenance of its Outstanding Universal Value have been undertaken, and*

- *Their impacts on the Outstanding Universal Value have been tested through independent Heritage Impact Assessments.* (p. 9)

V. The Heritage Impact Assessment

The submitted HIA supersedes the 2022 HIA undertaken for a previous version of the same project proposal. The HIA follows the method outlined in the 2022 *Guidance and Toolkit for Impact Assessments in a World Heritage Context*. The HIA discusses the role of the setting and wider setting in supporting the value of heritage places, including through reference to the State Party's own published guidance on the topic, as well as reference to the aforementioned 2022 *Guidance*. It also makes reference to the two recommendations made by ICOMOS in its February 2024 Technical Review.

The HIA bases its assessment on the definition of the attributes that contribute to the OUV of the property that is included in the Management Plan for the World Heritage property, selecting only attribute 7 as relevant to the setting of the property. The HIA relies on the intervisibility of setting (key visual links) and property to establish impact (*"The countryside contributes to the OUV of Blenheim insofar as it is related to the two designed 'key visual links' between it and the WHS, as described above."* [HIA, par. 5.18, p. 24]).

The HIA concludes that the project will *"result in a negligible change and a **minor negative impact** on the OUV of the Blenheim Palace WHS"* (HIA, par. 7.46, p. 34, original emphasis), which it typifies as temporary due to the expected impact assessed as likely to occur only during the 12-year construction period.

The HIA contains a summary cumulative assessment, which refers to past and ongoing applications and the individual conclusions of Environmental Statements (Park View) and considerations of the State Party's Planning Inspector at appeal (Hill Rise), as well as ongoing application processes (Botley West Solar Farm).

VI. Historic England advice

Historic England has provided a submission on the project and the HIA. Historic England's analysis disagrees with the conclusions presented in the HIA regarding the proposed construction of 500 homes in the immediate setting of the World Heritage property, concluding that the proposal would result in negative impacts on the attributes number 1, 4, and 7, as defined in the Management Plan for the property, and therefore result in 'less than substantial harm' to the World Heritage property and other registered heritage resources.

ICOMOS notes that it has previously indicated, including in its February 2024 Technical Review of the Botley West Solar Farm proposal, that the attributes as outlined in the Management Plan require revision and that attribute frameworks defined in Management Plans need to be further developed for impact assessment procedures, to be able to achieve the level of detail required for decision-making for intervention planning.

Historic England highlights that the Setting Study (Annex III of the Management Plan) also identifies the rural setting, which includes open agricultural and enclosed forestry use, as important to the maintenance of the property's OUV. Its analysis highlights that the impact of the proposal cannot be assessed as temporary, and that the assessment downplays the potential impact on attributes 1 and 7. Historic England also noted that, while other individual projects are noted in the HIA, the HIA does not provide an assessment of their cumulative impacts.

VII. Analysis

ICOMOS concurs with the assessment of Historic England that the proposed project will have negative permanent impacts on the OUV of the Blenheim Palace World Heritage property through land conversion in its immediate setting. ICOMOS considers that the presented HIA neither adequately assesses the potential impacts on the immediate setting of the property through the implementation of the project on the property's OUV, nor does it address the cumulative impact of the proposal in the context of other ongoing approved and planned projects in the immediate and wider setting of the World Heritage property, be this on the current situation or the baseline as at the time of inscription.

The HIA does not adequately address the impact of the project on the property's OUV through changes to its immediate setting, in part because it relies on assessing the intervisibility of the development site and the World Heritage property. In its February 2024 Technical Review, ICOMOS provided guidance, noting that: *"reducing the setting of the property only to views inside the property and views outward from the property would underrepresent the contribution of the setting towards the maintenance of the Outstanding Universal Value of the property"* (p. 7).

ICOMOS notes that the National Planning Policy Framework (NPPF, December 2024) provides guidance on decision-making in contexts where 'less than substantial harm' is expected due to a development:

215. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

ICOMOS advises, consistent with its past advice, that the process of 'weighing of harm' against public benefit is not aligned with the State Party's commitment under the 1972 World Heritage Convention to preserve Outstanding Universal Value.

ICOMOS has also in the past advised that a Landscape Character Assessment, specifically focused on the relationship between the wider setting of the property and its OUV, be undertaken (ICOMOS February 2024 Technical Review, p. 9).

ICOMOS has previously recommended that the Landscape Character Assessment should be:

[...] specifically focussed on the relationship between the wider setting of the property and its Outstanding Universal Value as a baseline assessment from which a further assessment of the impact on the Outstanding Universal Value of the property can be further developed. Such a Landscape Character Assessment should:

- *Be undertaken as foundational study to allow for the further development of the HIA, noted above,*
- *Assess the efficacy of the management of the immediate and wider setting in maintaining the landscape character of the immediate and wider setting of the property, and*
- *Clearly explore the importance of the wider setting, also in the understanding of the immediate setting and wider setting as what is passed through in the approach to the Park and Palace that cumulatively may have a large negative impact on the Outstanding Universal Value of the property.*
(ICOMOS February 2024 Technical Review, Botley West Solar Farm, p. 8)

VII. Conclusions and recommendations

ICOMOS concludes that the proposed construction of 500 homes on land in the direct setting of the Blenheim Palace World Heritage property will erode the contribution that its setting makes in support of the property's Outstanding Universal Value.

ICOMOS also concurs with Historic England that the proposal will lead to a permanent negative impact.

ICOMOS considers that the submitted Heritage Impact Assessment does not adequately assess the consequence of the proposed development on the protection of the Outstanding Universal Value of the Blenheim Palace World Heritage property.

ICOMOS further concurs with Historic England that the submitted Heritage Impact Assessment does not provide a cumulative assessment of the impacts of the various ongoing and planned projects on the baseline as at the time of inscription.

ICOMOS therefore considers it urgent for the State Party to:

- Undertake the recommended Landscape Character Assessment, which should include a study that assesses the contribution of the setting to the maintenance of the Outstanding Universal Value of the property, before any further projects are brought forward or approved.
- Undertake a revision and more thorough inventory of the attributes that contribute to the property's Outstanding Universal Value, as recommended by ICOMOS in its February 2024 Technical Review of the Urban Expansion in the setting of the property.

With regard to the 'Land South of Perdiswell Farm, Shipton Road, Shipton on Cherwell' project, ICOMOS advises that the planning permission be denied, due to the negative permanent impacts on the Outstanding Universal Value of the Blenheim Palace World Heritage property through land conversion in its immediate setting.

ICOMOS remains at the disposal of the State Party for further clarification on the above or assistance as required.

ICOMOS, Charenton-le-Pont
June 2026