

Mr Ben Million
Department of Energy Security and Net Zero
3-8 Whitehall Place
London
SW1A 2AW

Our ref: PL00794649
Your ref: EN010147

Telephone: [REDACTED]

Date: 2 Oct 2026

Dear Mr Million,

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

1. Introduction

- 1.1. Historic England is more formally known as the Historic Buildings and Monuments Commission for England. We are the Government’s statutory adviser on all matters relating to the historic environment, including world heritage.

2. Historic England Advice

- 2.1. The following is Historic England’s response to the representations/observations submitted by the Applicant and other Interested Parties, which the Secretary of State has invited comments on by 4 October 2026.
- 2.2. Historic England has considered the representations/observations submitted by the Applicant and other Interested Parties in relation to heritage and offers the following commentary as appropriate. An absence of comment should not be interpreted as implicit agreement with any representation/observation.

Applicant Cover Letter – reference to Heritage Impact Assessment

- 2.3. We note that the Applicant cover letter **[C1-094 p.6]** to submissions made on 16 July 2026 and published on 4 September 2026, sets out that “an updated HIA prepared by the applicant is still being considered by HE.”
- 2.4. This letter crossed with our submission, also dated 16 July 2026. In our 16 July 2026 submission **[C2-195, paragraph 2.5]** we set out that we have reviewed the revised

HIA and confirmed that the Applicant had broadly addressed the main aspects of our advice on a number of topics. We also remained on hand to discuss any outstanding issues with the Applicant. No further iteration of the HIA has been submitted.

- 2.5. Our position therefore remains as set out in our closing statement **[REF-118]**, our advice of 9 June 2026 **[C2-026]** and 16 July 2026 **[C2-195]** that the Applicant had addressed the points raised in those submissions either partially or in full. Where our comments had only been partially addressed, in some instances this was the result of the different conclusions reached by the Applicant's assessment.

ICOMOS TECHNICAL REVIEWS

- 2.6. Historic England would like to clarify any misunderstanding regarding ICOMOS Technical Reviews that might have arisen. We note reference in the Begbroke and Yarnton Greenbelt Campaign submission **[C2-070]** that "it (Historic England) believes ICOMOS's view should have primacy when making judgements and decisions about development adjacent to the WHS."
- 2.7. The approach to ICOMOS Technical Reviews that we take is that set out in our Closing Statement **[REF7-118] paras 2.55 - 2.61**. In particular, we stated that "The Examining Authority will need to carefully consider all of the ICOMOS International Technical Reviews in their determination of this application." We go on to say in **para 2.61** "Ultimately it will be for the Examining Authority to determine based on the evidence submitted." We trust that this addresses any potential misunderstanding.

3. Conclusion

- 3.1. Since 2022, Historic England has been involved in the application by providing constructive pre-application advice and statutory responses. We have also advised extensively throughout the examination.
- 3.2. Should the Secretary of State have any queries in relation to our response, we would be pleased to continue to offer our assistance and support as appropriate.



Yours sincerely,

[REDACTED]

Team Leader, Development Advice

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