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By email: [planning@westoxon.gov.uk](mailto:planning@westoxon.gov.uk), FAO Joan Desmond

20<sup>th</sup> January 2022

Dear Ms Desmond

## **21/04187/SCOP - LAND EAST OF PARK VIEW, WOODSTOCK : Comments by ICOMOS-UK**

ICOMOS-UK is the UK National Committee of ICOMOS, an international organisation which has a special role as the official adviser to UNESCO on cultural World Heritage Sites. ICOMOS-UK plays a leading role in implementing the World Heritage Convention 1972 (the Convention) within the UK and promoting best practice in the management of UK World Heritage Sites. The maintenance of the Outstanding Universal Value (OUV) of the UK World Heritage Sites and their settings is a key objective. ICOMOS has produced Guidance on Heritage Impact Assessments for Cultural World Heritage properties<sup>1</sup> and expects this to be followed for all development proposals which may affect World Heritage Sites or their settings.

ICOMOS-UK has the following comments on application 21/04187/SCOP.

### **Section 4**

The site which is the subject of this scoping review forms part of the setting of the Blenheim Palace World Heritage site. In setting the scope of the EIA process as it relates to the World Heritage Site and its setting, the requirements of the **UNESCO Operational Guidelines for the implementation of the World Heritage Convention (2021) paragraph 118bis** should be followed. More detailed guidance is contained in the **ICOMOS Guidance on Heritage Impact Assessment for Cultural World Heritage Properties (2011)** referenced above. ICOMOS UK expects this Guidance to be followed in relation to Land East of Park View, Woodstock and reference to be made in Section 4 to the documents cited above.

### **Section 7 Cultural Heritage**

7.3 should make it clear that the site forms part of the setting of the WHS which supports its Outstanding Universal Value.

Table 7.1 and Table 7.2

Blenheim Palace has an international designation being inscribed as a WHS under the World Heritage Convention to which the UK Government is a signatory. The site contains designated

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<sup>1</sup> ICOMOS Guidance on Heritage Impact Assessment for Cultural World Heritage Properties (2011)

buildings, including the Palace itself, as well as the gardens and park. It should be listed in a separate WHS category in the component column Table 7.1 and the potential effect column of Table 7.2.

#### Table 7.2

Given that the site forms part of the setting of a WHS, we consider that its importance and sensitivity as a receptor should be medium or high rather than low.

7.11- 7.13 The documents referred to in our comments on Section 4 above should also be referenced in 7.11 and guide the assessment methodology described in paras 7.11 to -7-13 as they relate to impact on the WHS and its setting.

### **Section 10 Landscape and visual effects**

10.5 Reference needed to possibility of views **to and** from the WHS and from the A44 as it enters Woodstock.

10.6 Table 10.1 Protected landscapes: Comments should cover views **to and** from the WHS.

10.8 Potential for change to the settings of receptors including the WHS - the surroundings in which they are experienced and their OUV/significance can be appreciated - should be recognised here as well as in section 7 .

10.9 Table 10.2 line 3 Change in relation to designated landscapes and townscapes should cover views to and from and changes to setting as well.

10.10 Also of relevance here are the documents referred to in our comments on Section 4 above and Historic England guidance on *The Setting of Heritage Assets* (2017).

### **Conclusion**

The EIA which is the subject of this scoping document will be for a major development on currently open agricultural land within the setting of the Blenheim Palace World Heritage Site. ICOMOS-UK is concerned that the status of the WHS and the procedures required by the **ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (2011)** are not fully recognised in the Scoping report. We ask that this is rectified to ensure that the potential impact of the development on the setting of the Blenheim WHS which supports its Outstanding Universal Value is fully identified, understood and articulated.

Yours sincerely

**Peter Marsden**  
**Chair, World Heritage Committee, ICOMOS-UK**