Historic England

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Our ref: P01594279
Your ref: 25/01510/OUT

Telephone: 0207 973 3749
Date: 31 July 2025

Dear Mr Traves

T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990

LAND SOUTH OF PERDISWELL FARM, SHIPTON ROAD, SHIPTON ON CHERWELL, OXFORDSHIRE

Application No. 25/01510/OUT

Thank you for your letter of 26 June 2025 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

Historic England has concerns that the information submitted is insufficient to reach a conclusion on the development's impact on the Blenheim Palace World Heritage Site (WHS).

We recommend that the applicant undertakes further work to provide additional predicted visualisations, further consideration of cumulative schemes (such as the Botley West Solar Farm) and a more comprehensive HIA that responds to the concerns raised by the 2024 ICOMOS Technical Review concerning the urban expansion within the setting of Blenheim Palace. When this information is available, we will be able to provide further advice on the impact on the WHS.

We would also recommend that any decision on this application is deferred until a notification response from the World Heritage Centre and/or the advice of the World Heritage Committee's Advisory Bodies has been received.

Historic England Advice

The Scheme

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This is an outline planning application for 500 dwellings (between 2-3 storeys tall) on an agricultural field to the southeast of Woodstock. All matters are reserved except for access.

The significance of the historic environment

This advice primarily concentrates on the following heritage assets:

- Blenheim Palace World Heritage Site (WHS) (1000091);
- Blenheim Palace Grade I Registered Park and Garden (1000434);
- Blenheim Roman Villa (1021367).

Blenheim's Significance, OUV, integrity, authenticity and the attributes that convey it

Blenheim Palace is of exceptional historical, architectural and cultural importance, and is recognised as one of the most important heritage sites in the world.

The boundary of the WHS almost completely follows the boundary of the Blenheim Palace Grade I Registered Park and Garden. Collectively there is a strong inter-relationship between these two designations as the significance of the Palace and RPG are drawn out within the detailed Statement of the World Heritage Site's Outstanding Universal Value (SOUV).

The statement of integrity in the SOUV sets out the ways in which the property's attributes have remained intact. For example, the perimeter wall 'defines its [the WHS] extent and maintains physical integrity'; 'the layout of the principal buildings remains unaltered'; changes wrought by later owners 'have not detracted from the OUV'; 'the park contains important veteran trees'; and 'important visual links do exist between the gates, the parkland buildings, buildings in the surrounding villages and landscape'.

The attributes which convey and express OUV are defined in and drawn from the SOUV but have been summarised and adopted in the WHS Management Plan (2017), which provides further detail to aid understanding. Of these Attribute 7 specifically mentions the visual relationship with the property's setting.

- Attribute 7 - '…views into and out of the site still provide key visual linkages between Blenheim Palace and the traditional English countryside and villages surrounding it.'

Meanwhile attributes 1 and 4 convey some associative values that could be drawn from this part of the property's setting:

- Attribute 1 – 'It remains the home of the same aristocratic family.' Whilst this is principally embedded in the family being in residence at Blenheim, the way the family has influenced the evolution of the landscape and use the wider estate to support its running of the estate is relevant here.

- Attribute 4 – 'The surviving special relationship between the important architectural elements and their landscape setting are an exceptional piece of design and, together are greater than the sum of their parts'. Whilst this relationship is focused within the parkland grounds, there are exceptions. There are designed and borrowed aspects

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from outside the boundary of the park that form an important part of its design. This includes the tower of St Martin's Church in Bladon, which acts as an eye catcher within the park and was used by Vanbrugh as the marker of the long north-south axis on which the park and house were laid out. Furthermore, it is from within the wider countryside landscape that the palace, its designed landscape and the stone wall boundary as a whole entity, can be seen to be the pre-eminent feature of the surrounding area.

The WHS Setting Study (which forms Appendix III to the WHS Management Plan) identifies how various parts of the WHS's setting have the potential to convey different aspects of its attributes and OUV and the ability to appreciate them. Paragraph 5.07 states that 'One of the key characteristics of the surroundings of Blenheim Park is that much of the setting lies within the wider extent of the Blenheim estate - which is effectively managed by a single owner… As a traditional landed estate, much of the land is retained in open agricultural and enclosed forestry use - another attribute which contributes to OUV'.

This emphasises that the surrounding land is in open agricultural and enclosed forestry use and that this contributes to OUV. The divergence of land uses therefore could inevitably affect the character of the surrounding landscape and thus the contribution to significance and the ability to appreciate it made by the WHS' setting.

Site's contribution to the OUV of the WHS and significance of the RPG

The site is a large arable field to the southeast of Woodstock. It does not border the WHS but comes close, corner-to-corner at the north-west corner of the site, separated by the busy A44 Oxford to Woodstock Road. At the corner the listed stone park wall around the WHS is glimpsed across the road but is screened by hedgerows and trees. The WHS boundary wall is then separated from the site as it runs south behind Campsfield Wood, a dense triangle covered mainly in mature woodland which largely prevents intervisibility between the development site and the WHS and RPG at Blenheim Palace.

Mature tree belts enclose the majority of the northern and eastern boundaries of the proposed site, limiting views in and out. The southern boundary is defined by relatively low hedgerow and a few hedgerow trees and is thus more open. Those approaching from Oxford get their first sense of the WHS as the preeminent feature in the landscape on the approach to the A44 roundabout, which the application site borders. The open nature of the field contributes to being able to appreciate the WHS set in the countryside on the edge of the market town of Woodstock.

Blenheim Roman Villa

Romano-British villas were extensive rural estates at the focus of which were groups of domestic, agricultural and occasionally industrial buildings. The term "villa" is now commonly used to describe either the estate or the buildings themselves. The buildings usually include a

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well-appointed dwelling house, the design of which varies considerably according to the needs, taste and prosperity of the occupier.

The villa site is on a barely discernible rise in the ground, just visible when viewed from the south (A44) and east sides of the development site.

While the scheduled monument is primarily significant for the archaeological remains associated with it, and no remains of the villa are visible above ground, it does derive some significance from its setting.

This is because Roman villas were deliberately designed to have a principal front (façade) with an outlook, much like country houses today. Illustration of villa orientation in Oxfordshire (Henig and Booth 2000, Fig 4.2) shows east, south-east and south to be the most commonly chosen, presumably to benefit from the sun.

This would fit with the Blenheim Villa having an ESE outlook across what is currently a large open arable field. The west boundary of the site is on the line of and illustrates the Saxon route known in the late Saxon period as Heh Straet; it runs roughly parallel to the enclosures within which the villa sits, suggesting historic continuity within the landscape.

The setting of the villa thus makes a modest contribution to the significance of the site, illustrating its original outlook and surroundings. It also illustrates the agricultural estate of the original villa on which its economy would have depended, at least in part.

Impact of the proposals

Blenheim World Heritage Site and RPG

We consider the proposals would change the experience of visitors approaching along the A44 if it is glimpsed through the existing and proposed tree screening and hedgerows.

The applicant's Environmental Statement Technical Appendix C: Assessment of potential effects on Blenheim Palace WHS concludes the development is predicted to result in a 'slight adverse effect on the OUV of Blenheim Palace, which is not significant and a slight/ moderate beneficial induced effect'.

Considering the development's proximity to the WHS and the need to ensure that your Council can be confident that no harm would be caused to OUV, we would have expected a more detailed set of visualisations to support this judgement. As it stands, without additional information, we cannot form a conclusive view on the likely impact of the development.

In the LVIA the only indication of the predicted scale of the development along the A44 is shown in viewpoint 5 (Figure 6.23a). In this view the development has the potential to appear in glimpses through the treeline, which could erode the visual appeal of the approach to Woodstock, compromising the traditional countryside setting and arrival at Blenheim; it could thus also harm the significance of the Park.

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We also wish to highlight to your authority that in March 2024, ICOMOS International as one of the Advisory Bodies to the UNESCO World Heritage Committee, conducted a Technical Review of a series of proposed and consented developments constituting urban expansion in the setting of Blenheim Palace. It concluded that it had concerns regarding the level of development pressure being experienced and that continued erosion of landscape character within Blenheim's setting posed an imminent danger of erosion of the contribution of its setting to OUV. ICOMOS' concern included reference to an earlier version of the current application, concluding it may further erode the setting of the property.

Blenheim Roman Villa

We concur with the ES Cultural Heritage Chapter assessment that the development would result in a 'medium to small change to the setting of the villa', which would be a 'moderate adverse effect' and would be at the lower end of the less than substantial range.

Relevant policies

The *National Planning Policy Framework* (NPPF) sets out the requirements for assessing proposals in the historic environment. Paragraph 2 states that planning policies and decisions must reflect relevant international obligations and statutory requirements, this includes the 1972 UNESCO World Heritage Convention.

In determining applications, Paragraphs 207 and 208 of the *National Planning Policy Framework (NPPF)* require the application details to set out the significance of the heritage asset, and for the council to take this into account when seeking to avoid or minimise harm to historical significance.

When considering the impacts of a proposed development on the significance of a heritage asset, great weight should be given to the asset's conservation (the more important the asset, the greater the weight should be) (Para 212). As a World Heritage Site, Blenheim Palace is of the highest significance and therefore the greatest weight should be given to its conservation.

Paragraph 213 goes on to set out that 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.'

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 (para 215).

The UK is a State Party to the 1972 UNESCO Convention Concerning the Protection of the World Cultural and National Heritage (the World Heritage Convention). The Convention sets out the duties of States Parties in identifying potential World Heritage Sites and their role in protecting, conserving, presenting and transmitting them to future generations. The processes and procedures for State Partiers to meet its obligations area set out in the UNESCO's Operational Guidelines for the Implementation of the World Heritage Convention (2025). The

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UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022) was also developed to help assess how harm can be avoided and minimised reflecting the requirements of NPPF Paras 207 and 208.

Historic England's Position

Additional Required Information

Historic England is concerned that the information submitted is insufficient to reach a conclusion of the development's impact on the World Heritage Site and further information is needed to support the application and the applicants' conclusions.

Firstly, in order to demonstrate the applicant's judgement on whether the harm to OUV has been avoided and minimised as far as possible, additional visualisations are required. We recommend a greater selection of predicted views of the development are provided on the approach along the A44. Clear visualisations that show the worst-case scenario from representative Viewpoints 5, 6 and12 would help to better illustrate the change of this experience and help ensure, at this outline stage, that any impacts of the scheme can be avoided through design.

Secondly, the application's assessment, as set out in the Environment Statement and Appendix C3: Assessment of effects on the Blenheim WHS, appears to largely have been reproduced from a 2022 withdrawn application.

In these documents the guidance has been informed by the ICOMOS 2011 guidance. This guidance was replaced by the publication of UNESCO's 2022 Guidance and Toolkit. Its therefore important the assessment is updated to reflect and take account of this most recent guidance. This includes demonstrating how the scheme has sought to address and respond to the concerns raised in the ICOMOS Technical Review, which is currently absent.

ES Chapter 3 has included the cumulative effects on the nearby housing schemes, however, hasn't considered whether there would be any cumulative impacts alongside the Botley West Solar Farm (a live DCO application at examination) on the OUV and significance of Blenheim Palace. Both the northern and central sections of the Botley West Solar Farm lie in close proximity to the development site, so we recommend that scheme is also considered as part of the cumulative assessment.

The Technical Appendix C should also be expanded to ensure that all other relationships are considered so it can provide a comprehensive analysis. To assist your authority and the applicant we have set out in Appendix 1 below the targeted changes we recommend should be given further consideration.

Once the additional information has been provided, we will be in a position to reach a view on whether we agree with the applicant's assessment and advise whether the scheme can be delivered in a way that avoids harm to the Outstanding Universal Value of Blenheim Palace.

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Blen*heim Roman Villa*

In relation to the Blenheim Roman Villa, we noted that the proposed development would result in the monument being permanently removed from ploughing and a range of heritage benefits were offered within the application. These are set out at in the current application in the Environmental Statement Main report, Chapter 5, paragraph 5.172. We recommend that the Conservation Management Plan for the monument referred to in the second bullet point of paragraph 5.172 should be secured through a condition attached to any permission granted for this development.

Wider considerations to note

We note that the site is not currently allocated in the Cherwell Local Plan, however, is a proposed allocation within the Cherwell Local Plan 2042. Historic England did not object to the allocation but recommended it needed significant work to refine the policy, supporting text and expand the draft HIA so it provides a fully rounded analysis and understanding of Blenheim's OUV. We expect the HIA for this application to be equally robust, and as noted above, we think further work is required before that is the case.

ICOMOS in their 2024 Technical Review recommended that such projects not be granted until: further studies into the contribution of the setting of the property to the maintenance of its OUV have been undertaken, and their impacts on OUV have been tested through independent Heritage Impact Assessments (HIAs). Historic England is recommending that close attention is therefore paid to ensuring the information submitted as part of the HIA is sufficient to inform the LPA decision making process, taking account of the ICOMOS Technical Review.

Given the previous engagement with UNESCO and the ICOMOS Technical Review from 2024, which commented on an earlier version of the current scheme, the Department for Culture, Media and Sport (DCMS) representing the UK State Party to the 1972 World Heritage Convention has therefore decided to notify the case to UNESCO.

This will take place via the World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee's Operational Guidelines for the Implementation of the World Heritage Convention. Notwithstanding that Historic England has recommended that your authority request additional information from the applicant, we would also 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.

Recommendation

Once this further information has been provided, we would welcome the opportunity to provide further comment so we can continue to advise your Council given the exceptional significance of the Blenheim World Heritage Site.

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Yours sincerely

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Appendix 1 - Historic England Comments on Technical Appendix C3: Assessment of effects on Blenheim Palace World Heritage Site with reference to related sections of Environmental Statement Chapter 5: Cultural Heritage Chapter of Environmental Statement (Chapter 5) with reference to the World Heritage Site.

Section (Appendix C3)	Comment
General	Technical Appendix C3 appears to largely reproduce the equivalent document submitted in support of application 22/01715/OUT. Since that application was withdrawn the methodology for assessment of impact on OUV has evolved and UNESCO has produced new guidance (July 2022) on the topic. Whilst UNESCO's new guidance is referenced in the Appendix it nonetheless requires the content to be refreshed to meet its requirements. In addition, since the previous application ICOMOS International has produced a Technical Review expressing its views regarding the potential impact of development within the setting of the WHS. We recommend that the Technical Appendix would benefit from further review and update to address these two additional considerations.
General	The HIA commissioned by Cherwell District Council as part of development of its new Local Plan is referred to as one of the data sources for the Environmental Statement in Chapter 5. Despite this there is no equivalent reference in this Appendix or response to or that HIA's recommendations or conclusions.
General	Section 5.138 of ES Chapter 5 acknowledges that there is potential for development on the site to impact the WHS and that there was need to locate it carefully as a result. The HIA does not include consideration of alternatives, either to the location of the scheme or in relation to its design. This is an important part of the HIA process which helps to demonstrate how the potential to avoid or minimise harm has been addressed. The Appendix would benefit from outlining how the design of the proposed scheme took account of the need to avoid impact on OUV. For example, assessment of how the landscaping of the proposed 'buffer' to the development might avoid or minimise harm by considering the transition in the character of the landscape between the WHS and Woodstock, the 'traditional English countryside' referred to in Attribute 7. There is no discussion of this important point of assessment in the HIA.

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C2	The Technical Appendix states that it takes the conclusions of ES Chapter 5 of the potential effects of the proposed development and retrospectively relates them to the international significance of the WHS. This is not how heritage impact assessment for World Heritage is intended to inform decision making. The results of a thorough assessment of the impact of the proposed development on the OUV of the WHS, based on consideration of its attributes of OUV, integrity and authenticity would ideally have been undertaken to inform the conclusions of the Environmental Statement. Ideally the methodology of assessment recommended by UNESCO would have been applied as part of an iterative approach to considering how harm to OUV could be avoided and minimised in bringing the latest iteration of the current scheme forward. The assessment does not address the integrity or authenticity of the property's attributes which is a necessary part of the process under UNESCO's guidance. For these reasons it is not considered to fully address the guidance in the Planning Practice Guidance from the UK Government: *'Effective management of World Heritage Sites involves the identification and promotion of positive change that will conserve and enhance their Outstanding Universal Value, authenticity, integrity and with the modification or mitigation of changes which have a negative impact on those values.'* Paragraph: 026 Reference ID: 18a-026-20190723 *'Applicants proposing change that might affect the Outstanding Universal Value, integrity and, where applicable, authenticity of a World Heritage Site through development within the Site or affecting its setting (including any buffer zone or equivalent) need to submit sufficient information with their applications to enable assessment of the potential impact on Outstanding Universal Value.'* Paragraph: 035 Reference ID: 18a-035-20190723
C10	The assessment does not justify the conclusion that the proposed development site does not contributes to or therefore warrant consideration of impact in relation to 6 of the attributes of OUV defined from the Statement of Outstanding Universal Value in the WHS Management Plan. We consider that the contribution made by the site is undervalued due to the limited assessment of the ways in which the property's setting is essential to maintaining and to appreciating its attributes of OUV. GPA3 Step 3 requires the assessor to consider the effect on significance or on the ability to appreciate it. We consider this is relevant here.
C11 – C12	It is appropriate to consider how the assets in the study area might be affected in relation to the attributes of OUV that they are related to by the proposed development. However, this does not form a complete basis for assessment. The contribution, for example, made by the site's land use and character to Attribute 1 as a reflection of the relationship between the wider Estate and Blenheim itself is not considered in the Technical

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	Appendix. The baseline information included in Chapter 5 of the ES provides the background upon which such considerations could be based.
C12	The conclusions in relation to the extent of change are not justified by a supporting narrative to explain how they have been arrived at. We would encourage greater reference between the narrative in Chapter 5 and this document such as at paragraphs 5.121 and following, particularly 5.138, 5.63-5.99.
General – with reference to Chapter 5 of the ES	We offer the following recommendations for review of Chapter 5 alongside Technical Appendix C3: • 5.2-5.9; 5.19-5.20: The national policy section makes no reference to Paragraph 2 of the NPPF *'…Planning policies and decisions must also reflect relevant international obligations and statutory requirements.'* This requirement includes the obligations under the World Heritage Convention • 5.16; Table 5.1: The reference to the Operational Guidelines (2023) is out of date. This was updated in 2024 before the ES was drafted and has now been republished since the World Heritage Committee meeting this year, in July 2025. • 5.36: This section refers to ICOMOS. We believe this should more correctly refer to ICOMOS-UK which is separate to ICOMOS International who provide advice to the UNESCO World Heritage Committee. • 5.177 & ES Chapter 3: It is important that the comments from ICOMOS International are considered and responded to in discussion of cumulative impacts in relation to the WHS.

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