

Ms Cathering Tetlow  
Principal Planner for Major Developments and Appeals  
West Oxfordshire District Council  
New Yatt Road  
Witney  
Oxfordshire

27<sup>th</sup> July 2016

Dear Ms Tetlow

**OX28 1PB16/01364/OUT LAND EAST OF WOODSTOCK ROAD, WOODSTOCK,  
OXFORDSHIRE**

ICOMOS-UK is the UK National Committee of ICOMOS, 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* and expects this to be followed for all development proposals which may affect World Heritage Sites or their settings.

*Background*

In our letters of 29 January, 10 August and 22 September 2015, we commented on an application (**14/02063/OUT**) to develop a much larger area of farmland to the south east of Woodstock between the A44 Oxford Road and the A4095 Upper Campsfield Road. Our concerns related to its potential impact on the Outstanding Universal Value of Blenheim WHS and its setting including both the open farmland of the site and the historic town of Woodstock. This application was refused.

*The present application*

The present application is for a smaller development of 300 dwellings as opposed to the 1500 proposed in the earlier application and is confined to the area of land adjacent to the existing settlement and wholly within the West Oxfordshire boundary. While this is a significant reduction in scale, the development would still be a major one in relation to the

existing settlement. Phase 1 for which full permission is sought would be closest to the Blenheim Palace WHS, sitting directly opposite its south- eastern boundary. This boundary is inaccurately described in the documentation accompanying the application. It continues along the A44 to the corner of the back lane running to the east of the paddock which lies to the east of the park wall. A copy of the UNESCO map of the WHS boundary is attached for clarification.

In line with the terms of the World Heritage Convention, the comments below consider the likely impact of the development on both the World Heritage Site itself and its wider setting.

#### *Impact on the Blenheim World Heritage Site*

Taking its cue from the existing settlement to the north- west of the site, the new development would be set back some 30m from the A44 and screened, over time, by a landscape belt incorporating existing planting. With the existing planting in the Lower Park, along the Park wall, and along the WHS boundary beside the A44, provided that it was maintained, this would be likely to provide adequate screening of the site from within the adjacent parts of the WHS certainly during the summer months. In the winter when the leaves were off the trees and with more need for lighting, some filtered views of the development might be glimpsed from the WHS.

We accept that the greatest impact on the tranquillity of the closest part of the Park comes from the A44. The reduction in the size of the development, the intended lighting scheme and the absence of sports floodlighting would limit the negative impact of noise and light although this would still be greater than from the existing open farmland. There would be some impact, for example, on the listed Cowyards, positioned close to the entrance to the primary road with its higher level of lighting.

An exercise with cherry pickers at illustrative heights, undertaken in connection with the previous application partly at our request, is understood to have demonstrated that the much larger development would not be visible from representative locations across the wider Park or from the Palace. If correct, this suggests that a smaller development would be unlikely to impact on more distant views from within the WHS.

The OUV of the WHS is derived from the architectural importance of the Palace and associated buildings and from the quality and influence of its 18<sup>th</sup> century landscape park. On the evidence provided, it is difficult to argue that its integrity, which is well-protected

by its enclosing wall and planting, would be significantly compromised by the development proposed in the current application.

#### *Impact on the setting of the Blenheim World Heritage Site*

Setting is defined as the surroundings in which an historic asset is experienced (*The Setting of Heritage Assets: Historic England Good Practice Advice Note 3*). Although the Blenheim WHS does not have a formal buffer zone, there is still an obligation to protect its setting which provides both its context and the approach to it. Paragraph 112 of the *Operational Guidelines for the Implementation of the World Heritage Convention 2015* makes clear that the broader setting of a WHS supports its OUV and needs appropriate management.

*112. .... An integrated approach to planning and management is essential to guide the evolution of properties over time and to ensure maintenance of all aspects of their Outstanding Universal Value. This approach goes beyond the property to include any buffer zone(s), as well as the broader setting. The broader setting, may relate to the property's topography, natural and built environment, and other elements such as infrastructure, land use patterns, spatial organization, and visual relationships. It may also include related social and cultural practices, economic processes and other intangible dimensions of heritage such as perceptions and associations. Management of the broader setting is related to its role in supporting the Outstanding Universal Value.*

The WHS setting relevant to the current application comprises the town of Woodstock and the open farmland beyond it to the south east.

#### *The town of Woodstock*

In our comments on the earlier application, we emphasised the key contribution made by the town of Woodstock to the setting of the WHS. We felt that the sheer scale of the development then proposed would unbalance the historic physical relationship between the town and the park/palace that gives Woodstock its distinctive character, causing further harm to the setting of the WHS. The development now proposed would be significantly smaller although still substantial in proportion to the existing suburbs of Woodstock, would relate more closely to the adjacent settlement in terms of layout and design and would provide a more attractive edge to the town. This diminishes in our view the level of harm to Woodstock as an important element in the setting of the WHS.

#### *The open setting of the WHS*

The setting of Blenheim Park and the royal hunting park from which it developed has been predominantly an open rural one since its first enclosure in the 12<sup>th</sup> century. This historic setting has survived the centuries remarkably well on its western and northern sides but the area of open farmland of which the application site forms part is the only place between the settlements of Woodstock and Bladon where it now remains. This allows visitors approaching the WHS on the main route from Oxford and London to appreciate the contrast between the enclosed park on one side and the open country on the other. By enabling them to gain a better understanding of an aspect of the social and cultural significance of aristocratic parks exemplified by Blenheim, the open setting acts in support of the OUV of the WHS as envisaged in para 112 of the *Operational Guidelines*.

The Heritage Statement and cultural heritage chapter of the Environmental Statement submitted with the application do not adequately consider the setting of the WHS and, in assessing the impact of the proposed development, fail to recognise the value of the open setting to understanding and appreciating the significance of the WHS.

Unlike the previous application, the smaller development now proposed would require the loss of only part of the remaining open land adjacent to the WHS between Woodstock and the A4095. This could, however, reduce the agricultural viability of the remainder and would still harm the WHS by continuing the incremental erosion of its open setting south east of the town begun by post-war suburban development from the 1950s.

In identifying the application site as suitable for the development of 150-180 houses, the 2014 West Oxfordshire SHLAA mentioned its location within the setting of the Blenheim WHS but did not acknowledge this as a constraint. The present scheme is for up to 300 houses plus 1100sq m of A1/A2/B1/D1 floor space and would still constitute a major development within the immediate setting of a heritage asset of the highest importance. For these reasons, we believe that the site should remain open and undeveloped.

#### *Funding the future maintenance of the WHS*

We are aware that one of the benefits of the proposed development put forward by the applicant is that it would secure funding needed for the future conservation and maintenance of the WHS. We acknowledge this aim but we have, as before, deliberately confined our comments on the current application to the core issues of impact on the WHS and its setting.

### *Conclusion*

We do not believe that the OUV of the Blenheim Palace WHS would be significantly compromised by the proposed development. Our principal concern remains the further erosion of the surviving open setting of the WHS south east of Woodstock. The value of this setting in supporting the OUV of the WHS has been described above. While it can be argued that the current application follows the precedent of suburban housing outside the park wall established from the 1950s, these developments were largely built before the inscription of Blenheim as a WHS in 1987.

We have explained as clearly as possible why we consider that the application site should remain undeveloped but we recognise that the balance of judgement in determining the application rests with the local planning authority. The concerns raised by the present application would be greatly increased by any future attempt to resurrect larger-scale development proposals of the kind for which consent was refused in September 2015 and which we strongly opposed. Any decision to approve the current application should be taken not as a precedent but as allowing the existing settlement to be satisfactorily terminated against an historic boundary. Beyond this, a halt should be called to all further development before progressive salami-slicing of the remaining open land results over time in its entire loss.

Yours sincerely

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