Historic England

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Our ref: P01594279

Your ref: 25/01510/OUT

Telephone: 02079733749

Date: 29 July 2026

Dear Carlos,

re: 25/01510/OUT Land South of Perdiswell Farm, Shipton Road, Shipton on Cherwell

Thank you for our recent correspondence. We have received two separate communications from you regarding the outline application for Land South of Perdiswell Farm (ref 25/01510/OUT). Your first email dated 21 July seeks clarification on two specific points. The second correspondence dates to the 23 July, in which your council has requested any comments in response to the applicant's rebuttal letter (Tor & Co; 10 July 2026).

Please consider this letter as a joint response addressing the points raised in both of those communications.

Historic England response to email dated 21 July.

Your council raised the following two queries, which we will respond to each in turn.

1) *ICOMOS in their latest consultation response dated June 2026, cite that the 2017 WHS Management Plan is outdated and that the attributes as outlined in the Plan require revision/review (informed by a Landscape Character Assessment) and further development for impact assessment procedures and to be able to achieve the level of detail required for decision making for intervention planning. – Are Historic England of the view that the currently adopted 2017 WHS Management Plan provides an adequate basis for an assessment to be made on the development's heritage impacts to Blenheim Palace and Park, noting that your comments in establishing the relevant attributes to the setting of the WHS were derived from the 2017 Management Plan, which then informed how you quantified the development's impacts on the setting of the WHS.*

Historic England response:

The ICOMOS' Technical Review (June 2026) reiterated the comments made in the earlier Technical Review on the Urban expansion in the setting of Blenheim Palace (February 2024). These indicate that ICOMOS considers the current WHS Management plan and local planning framework do not sufficiently protect the property's setting, particularly in their view in the absence of a buffer zone. ICOMOS has recommended that a revised Management Plan is adopted (alongside a Landscape Character Assessment) and suggests that this should take place before any other development in the setting is approved.

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ICOMOS also (again as previously recommended in earlier Technical Reviews) indicates that the attributes, as outlined in the Management Plan, require revision, and further development for impact assessment procedures.

We have advised, in agreement with ICOMOS, that the revision of the WHS Management Plan should include a formal and detailed review of the attributes (following the process for identification of attributes in the adopted Statement of Outstanding Universal Value set out in UNESCO 2022) supported by a setting study. This would helpfully enhance the understanding of Blenheim's OUV and its attributes and what is needed to preserve them as well as the contribution made by its setting.

In advising your local planning authority on the Perdiswell scheme, we outlined our assessment of the impact on Blenheim's OUV, and of the contribution made by its setting, drawing on the list of attributes included in the 2017 WHS Management Plan but also with detailed reference to the adopted Statement of Outstanding Universal Value (SOUV).

It is the SOUV (together with the dossier submitted at nomination), not the WHS Management Plan, that outlines the baseline understanding of OUV at the time of inscription.

The 2017 WHS Management Plan is a material consideration and a very important document within the protection and management system for the World Heritage property, but it should not be considered in isolation as the sole source of information about Blenheim's OUV.

2) *Both Historic England and ICOMOS outline that the HIA 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. – Does the 'less than substantial harm' to the WHS and Park identified in your consultation response dated January 2026, relate to the development's heritage harm to the WHS, in isolation or does it account for the development's cumulative heritage impacts relative to the ongoing and planned projects in the areas and if it does account for this, can the cumulative assessment in the HIA be relied upon when there are reservations on how this assessment was undertaken in HIA?*

Historic England response

Our advice took account of the cumulative impact of change that has happened since inscription and our conclusion that the harm was less than substantial overall reflects that, despite the fact that the applicant had not submitted all the information or approached it in line with UNESCO's guidance. When considered cumulatively, the impact of the proposals is greater than when considered in isolation, but we still consider it to be less than substantial overall.

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Applicant's Rebuttal Letter (tor&co; 10 July 2026)

The applicant has raised five main points, and we will respond to each in turn.

1. *The agreement between HE's conclusions and those presented in the Heritage Impact Assessment (tor&co, December 2025 – included as Technical Appendix C3 of the submitted Environmental Statement);*

Our respective conclusions regarding the level of harm do not disagree. However, this is not the same as saying that there is total alignment in the final analysis of the detail and understanding about how that harm has been caused, whether it can be minimised further, and whether it is justified are important considerations alongside the level of harm assessed

Historic England has not objected to this application, we have however indicated that the safeguards outlined in our advice needed to be addressed for the application to meet the requirements under the NPPF, since harm would be caused. Your authority will however need to be satisfied that the harm has been avoided and minimised and is clearly and convincingly justified.

Historic England and ICOMOS are separate organisations with different remits and responsibilities. Historic England has advised in line with its role and responsibilities and drawn attention to the advice of ICOMOS, given its particular role in advising the World Heritage Committee who are the lead body responsible for implementation of the World Heritage Convention. Historic England's advice is not influenced by that of ICOMOS therefore, it is our role to help understand and if possible, address the points they raise.

2. *Areas of disagreement with Historic England and how this does not imply deficiency;*

We acknowledge the disagreements can in part be interpreted as different professional judgement. However, Historic England and ICOMOS Technical Review, two bodies with specific responsibilities relating to World Heritage, have both raised concerns with the approach in the application.

Our advice refers to the Statement of Outstanding Universal Value (SOUV). This is the main source of information and relevance for Blenheim's OUV, not the WHS Management Plan.

It is not the role of Historic England as the statutory consultee to replicate the level of information provided by the applicant to address the requirements under the NPPF. It is our role to provide advice to your local planning authority based on the information submitted by the Applicant. Where we have outlined a disagreement, we have done so at a level that ensures that our position and the reason and basis for it is understood by the local planning authority when making its decision. Our advice is sufficiently detailed and clear to form a robust basis for your local planning authority to take into account.

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The HIA, as we have concluded previously, does not comprehensively utilise the UNESCO standard approach, as has been demonstrated in relation to cumulative impact.

3. *Clarification on cumulative impacts in the HIA;*

It is well understood and explained in UNESCO's 2022 guidance that cumulative impact in relation to World Heritage, to address the State Party's obligations under the World Heritage Convention, must make an assessment of the impact from the point of inscription. This is because it is necessary to preserve WHS in perpetuity including the state of conservation of their attributes which should be maintained or enhanced.

We have been clear that this is the point of disagreement in relation to the methodology, i.e. that the assessment of cumulative impact on the OUV of the WHS since inscription is missing. That is not the same as indicating that there is no assessment of cumulative impact.

4. *Comment on ICOMOS's reference to a review of attributes and Landscape Character Assessment;*

It is entirely possible to take account of the contribution made by landscape character to significance and its maintenance as we have done in our advice, given our agreement with ICOMOS that this is an aspect of Blenheim's setting that contributes to its significance and OUV.

We have advised on the appreciation and identification of attributes of OUV in our submissions with reference to the SOUV.

The ongoing processes for both will enhance the WHS Management Plan and its contribution to understanding and protecting Blenheim's OUV including from the impact of change within its setting, but both key points can be addressed within the scope of this application as Historic England has done in its advice to your local planning authority.

5. *Clarification on the status of World Heritage Sites in the planning system and ICOMOS' role as consultee;*

World Heritage Site (WHS) status is not statutory at this time, but the World Heritage Convention remains a binding agreement on the UK Government (as recognised in language at NPPF paragraph 2).

WHS are designated heritage assets of the highest significance under the NPPF (paragraph 202), which also recognises that they are irreplaceable and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. The NPPF also recognises that any conflict between a World Heritage Site's conservation and a development proposal be avoided or minimised, and that great weight should be given to the asset's conservation and the more important the asset

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the greater the weight should be (so WHS are given the greatest weight among designated heritage assets). The importance of their conservation should not be downplayed.

Comments from ICOMOS are a material consideration in the planning process. As an Advisory Body to the World Heritage Committee named with a specific role in the World Heritage Convention, their input makes a contribution to the planning system, and this is why this was shared with your local planning authority. It is for your council to decide how much weight that advice is given in its determination.

Yours sincerely

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