Botley West Solar Farm

Environmental Statement

Volume 1

Chapter 7: Historic Environment

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Glossary

Term	Meaning
Bronze Age	The time period 1,800 – 600 BC.
Conservation Area	An area designated by a local authority as being of special architectural or historic interest.
Cumulative Effects	The combined effect of the Botley West solar farm in combination with the effects from other proposed developments, on the same receptor or resource.
Designated heritage asset	A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.
Early Medieval	The time period AD 410 – 1066.
Environmental Impact Assessment	The process of identifying and assessing the significant effects likely to arise from a project. This requires consideration of the likely changes to the environment, where these arise as a consequence of a project, through comparison with the existing and projected future baseline conditions.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
Heritage asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.
Historic Landscape Characterisation	An aspect of more general landscape characterisation that seeks to provide an additional element of ‘time-depth’, allowing the historic evolution of the landscape to be perceived and understood.
Impact	Change that is caused by an action/proposed development, e.g., land clearing (action) during construction which results in habitat loss (impact).
Inter-related Effects	Inter-related effects arise where an impact acts on a receptor repeatedly over time to produce a potential additive effect or where a number of separate impacts, such as noise and habitat loss, affect a single receptor.
Iron Age	The time period 600 BC – AD 43.
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.

Term	Meaning
Listed building	A building or structure placed on a statutory 'List' of Buildings of Special Architectural or Historic Interest. There are three grades of listing, which are; • grade I (these are of exceptional interest); • grade II* (these are particularly important); and • grade II (these are of special interest).
Main Project Substation	The project substation transforms electricity generated by the solar PV installation from high voltage to a higher voltage (275/400kV) for connection to the NG substation. This substation is crucial for managing and regulating the voltage levels of the electricity produced, ensuring efficient transmission while minimizing energy losses and enhancing the reliability of the renewable power supply.
Medieval	The time period 1066 – 1485.
Mesolithic	The time period 12,000 – 4,000 BC.
Modern	The time period 1800 – present.
National Heritage List for England	List of nationally designated heritage assets maintained by Historic England.
Neolithic	The time period 4,000 – 1,800 BC.
Palaeolithic	The time period 900,000 – 12,000 BC.
Power Converter Station	A power converter station converts electricity between Alternating Current (AC) and Direct Current (DC).
Post-medieval	The time period 1486 – 1799.
Prehistoric	The general term used for the time period before the Roman invasion of AD 43.
Preliminary Environmental Information Report	A report that provides preliminary environmental information in accordance with Regulation 12 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This is information that enables consultees to understand the likely significant environmental effects of the project and which helps to inform consultation responses.
Registered Park and Garden	A park and/or garden of special historic interest placed on a non-statutory Register. There are three grades of registration: • grade I – these are of exceptional interest; • grade II* - these are particularly important; and • grade II – these are of special interest.
Roman	The time period AD 43 – 410.
Scheduled Monument	An archaeological site given legal protection by being placed on a 'Schedule' of monuments.

Term	Meaning
Scoping Opinion	Sets out the Planning Inspectorate's response (on behalf of the Secretary of State) to the Scoping Report prepared by the Applicants. The Scoping Opinion contains the range of issues that the Planning Inspectorate, in consultation with statutory stakeholders, has identified should be considered within the Environmental Impact Assessment process.
Secondary Project Substation	A secondary project substation is a facility that reduces the voltage of power from medium to low levels for efficient distribution to end users
Study area	This is an area which is defined for each environmental topic which includes the Order Limits as well as potential spatial and temporal considerations of the impacts on relevant receptors. The study area for each topic is intended to cover the area within which an impact can be reasonably expected.
The Project	The Botley West Solar Farm.
The Site or Order Limits	The area of land encompassing the Project development and shown on the Site Location and Order Limits Overview (Volume 2, Figure 1.1 of the ES).
Visualisation	A computer simulation, photomontage or other technique illustrating the predicted appearance of a proposed development.
Zone of Theoretical Visibility	A map, usually digitally produced, showing areas of land within which, a development is theoretically visible.

Abbreviations

Abbreviation	Meaning
AD	Anno Domini – after the birth of Christ
ADS	Archaeology Data Service
BC	Before Christ
BGS	British Geological Survey
CDC	Cherwell District Council
CIfA	Chartered Institute for Archaeologists
CoCP	Code of Construction Practice
DBA	Desk-based Assessment
DCMS	Department for Culture, Media and Sport
DCO	Development Consent Order
DEMP	Decommissioning Environmental Management Plan
DESNZ	Department for Energy Security and Net Zero
DTMP	Decommissioning Traffic Management Plan
EIA	Environmental Impact Assessment

Abbreviation	Meaning
ES	Environmental Statement
HER	Historic Environment Record
HIA	Heritage Impact Assessment
HLC	Historic Landscape Characterisation
ICCROM	International Centre for the Study of the Preservation and Restoration of Cultural Property
ICOMOS	International Council on Monuments and Sites
IEMA	Institute of Environmental Management and Assessment
IHBC	Institute of Historic Building Conservation
IUCN	International Union for Conservation of Nature
NGET	National Grid Electricity Transmission
NHLE	National Heritage List for England
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
OCC	Oxfordshire County Council
PAS	Portable Antiquities Scheme
PCS	Power Converter Station
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
PIR	Passive Infra-Red
PPG	Planning Policy Guidance
UNESCO	United Nations Educational, Scientific and Cultural Organisation
VWHDC	Vale of White Horse District Council
WHS	World Heritage Site
WODC	West Oxfordshire District Council
WSI	Written Scheme of Investigation
ZoI	Zone of Influence
ZTV	Zone of Theoretical Visibility

Units

Unit	Description
ha	hectares
km	kilometres

Unit	Description
kV	kilovolts
m	metres
MWe	Megawatt electrical

7 Historic Environment

7.1 Introduction

Overview

7.1.1 This chapter of the ES sets out the approach to the assessment of likely significant effects, of the Project, upon Historic Environment receptors. The application for development consent is being made to the Planning Inspectorate (PINS) under the Planning Act 2008. The proposal is to install and operate approximately 840MWe of solar generation in parts of West Oxfordshire, Cherwell and Vale of White Horse Districts, within the county of Oxfordshire (the Project).

7.1.2 This chapter of the Environmental Statement (ES) has been prepared by RPS for Photovolt Development Partners GmbH (PVDP) on behalf of SolarFive Ltd (the Applicant).

7.1.3 SolarFive is the 'special purpose vehicle' (SPV) for the Project and has been awarded a generation licence by Ofgem and offered a grid connection by National Grid Electricity Transmission (NGET) from October 2027. SolarFive is a licence holder under the Electricity Act 1989, and is also a company registered in England and Wales (company no. 12602740).

7.1.4 This ES has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, as amended (the 'EIA Regulations'), and other required documents including a statement on pre-application consultation.

7.1.5 This ES Chapter has been prepared in accordance with the approach set out in the Scoping Report and the subsequent Preliminary Environmental Information Report (PEIR).

7.1.6 The assessment presented is informed by the following technical chapters:

- Volume 1, Chapter 8. Landscape and Visual Impact Assessment **[EN010147/APP/6.3]**.

7.1.7 This chapter also draws upon information contained within the following appendices:

- Volume 3, Appendix 7.1 Historic Environment Desk-based Assessment **[EN010147/APP/6.5]**;
- Volume 3, Appendix 7.2 Assessment of Airborne Remote Sensing and Satellite Imagery for Archaeology **[EN010147/APP/6.5]**;
- Volume 3, Appendix 7.3 Geophysical Survey Report **[EN010147/APP/6.5]**;
- Volume 3, Appendix 7.4 Blenheim Palace World Heritage Site – Heritage Impact Assessment **[EN010147/APP/6.5]**;
- Volume 3, Appendix 7.5: Settings Assessment **[EN010147/APP/6.5]**; and

- Volume 3, Appendix 7.6: Outline Written Scheme of Investigation **[EN010147/APP/6.5]**.

7.2 Legislative and Policy Context

Legislation

7.2.1 A summary of the relevant legislation is provided below, with further details included in section 1.3 of Volume 3, Appendix 7.1: Historic Environment Desk-based Assessment of the ES **[EN010147/APP/6.5]**.

7.2.2 Statutory protection for archaeological remains is principally enshrined in the Ancient Monuments and Archaeological Areas Act 1979. Nationally important archaeological sites are listed in a Schedule of Monuments and are afforded statutory protection.

7.2.3 The Planning (Listed Buildings and Conservation Areas) Act 1990 and the Town and County Planning Act 1990 provide statutory protection to Listed Buildings and their settings, and present measures to designate and preserve the character and appearance of Conservation Areas.

7.2.4 Historic Parks and Gardens, and Historic Battlefields, have received recognition under the National Heritage Acts 1980, 1983 and 2002. Such sites are described on registers maintained by Historic England for the Department for Culture, Media and Sport (DCMS), but such a designation does not afford statutory protection.

7.2.5 The Infrastructure Planning (Decisions) Regulations 2010 require decision-makers to have regard for the desirability of:

- Preserving listed buildings and their settings or any features of special architectural or historic interest that they possess;
- Preserving or enhancing the character or appearance of conservation areas; and
- Preserving scheduled monuments and their settings.

Planning policy context

National Policy Statements

7.2.6 There are currently six designated energy National Policy Statements (NPSs), EN-1, EN-2, EN-3, EN-4, EN-5 and EN-6. The 2023 revised NPSs (EN-1 to EN-5) came into force on 17 January 2024.

7.2.7 Three of these NPSs contain policy relevant to solar farm development, specifically:

- Overarching NPS for Energy (NPS EN-1) which sets out the UK Government's policy for the delivery of major energy infrastructure (DESNZ 2023a);
- NPS for Renewable Energy Infrastructure (NPS EN-3) (DESNZ 2023b); and

- NPS for Electricity Networks Infrastructure (NPS EN-5) (DESNZ 2023c).

7.2.8 **Table 7.1** sets out a summary of the policies within NPS EN-1 and NPS EN-3, relevant to the Historic Environment. There are no policies within NPS EN-5 which have specific relevance for the Historic Environment.

Table 7.1: Summary of designated NPS document requirements relevant to this chapter

Summary of NPS Requirement	How and where considered in the ES
NPS EN-1	
NPS EN-1 Paragraph 5.9.9 The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES. This should include consideration of heritage assets above, at, and below the surface of the ground. Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment. The assessment should include reference to any historic landscape or seascape character assessment and associated studies as a means of assessing impacts relevant to the proposed project.	An assessment of likely significant heritage impacts is set out in **Section 7.9** of this ES Chapter. This includes consideration of heritage assets above, at and below the surface of the ground. Additional assessment is provided within Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. An assessment of likely cumulative impacts is set out in **Section 7.11** of this ES chapter. The assessment includes reference to relevant historic landscape character assessments.
NPS EN-1 Paragraph 5.9.10 As part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The level of detail should be proportionate to the importance of the heritage assets and no more than is necessary to understand the potential impact of the proposal on their significance. As a minimum, the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, English Heritage or Cadw) and assessed the heritage assets themselves using expertise where necessary	A description of the baseline heritage assets is provided in Volume 3, Appendix 7.1: Historic Environment Desk-based Assessment of the ES and in summary form within **Section 7.6** of this ES chapter **[EN010147/APP/6.5]**. The Oxfordshire Historic Environment Record (HER) has been consulted. Appropriate expertise has been used in the assessment of heritage assets.

Summary of NPS Requirement	How and where considered in the ES
according to the development's impact.	
NPS EN-1 Paragraph 5.9.11. Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to explain the impact	The desk-based assessment is presented in Volume 3, Appendix 7.1: Historic Environment Desk-based Assessment of the ES **[EN010147/APP/6.5]**. Field evaluation in the form of geophysical survey has been undertaken and the results are presented in Volume 3, Appendix 7.3: Geophysical Survey Report of the ES **[EN010147/APP/6.5]**. The assessment of effects resulting from change within the setting of heritage assets has been undertaken with reference to the accurate representative visualisations presented in Volume 2, Figures 8.12 - 8.127 of the ES **[EN010147/APP/6.4]**.
NPS EN-1 Paragraph 5.9.12. The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents. Studies will be required on those heritage assets affected by noise, vibration, light and indirect impacts, the extent and detail of these studies will be proportionate to the significance of the heritage asset affected.	The impact of the Project on the significance of heritage assets is assessed within **Section 7.5** of this ES chapter.
NPS EN-1 Paragraph 5.9.13. The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected. This can include, where possible: • enhancing, through a range of measures such a sensitive design, the significance of heritage assets or setting affected • considering where required the development of archive capacity which could deliver significant public benefits	A greater level of understanding of buried archaeological remains within the Site has been established as a result of the geophysical survey and other non-intrusive surveys that have been undertaken. This information is presented within Volume 3, Appendix 7.1: Historic Environment Desk-Based Assessment of the ES, Volume 3, Appendix 7.2: Assessment of Airborne Remote Sensing and Satellite Imagery for Archaeology of the ES, and Volume 3: Appendix 7.3: Geophysical Survey Report of the ES **[EN010147/APP/6.5]**. Where these surveys have identified the presence of areas containing significant archaeological remains, no development is proposed and these areas would be retained as grassland within the development. The change in land-use within these areas containing significant archaeological remains (from arable to grassland) represents a positive contribution to the historic environment as these areas would no longer be subject to recurring impacts from ploughing and secondary cultivation. This is further explained within Section 7.5 of this ES chapter.

Summary of NPS Requirement	How and where considered in the ES
• considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to, or interpretation, understanding and appreciation of, the heritage assets affected by the scheme	
NPS EN-1 Paragraph 5.9.14. Careful consideration in preparing the scheme will be required on whether the impacts on the historic environment will be direct or indirect, temporary, or permanent.	The Project has been designed such that there are no direct physical impacts on any designated heritage assets. Where possible, direct non-physical impacts on designated heritage assets have been avoided or reduced through design. Where possible, direct physical impacts on non-designated heritage assets have been avoided or reduced through design. Where possible, the Project has been designed such that impacts on the historic environment are temporary and fully reversible. This is further explained within Section 7.5 of this ES chapter.
NPS EN-1 Paragraph 5.9.15. Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.	The design of the Project considers the settings of designated heritage assets, including Conservation Areas and World Heritage Sites, and in each case seeks to preserve those elements of the setting that make a better contribution to the asset. This consideration of settings is presented within Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**.
NPS EN-3	
NPS EN-3 Paragraph 2.10.112. Applicant assessments should be informed by information from the Historic Environment Records (HERs) or the local authority.	Information has been obtained from the Oxfordshire HER. This is described in Volume 3, Appendix 7.1: Historic Environment Desk-Based Assessment of the ES **[EN010147/APP/6.5]**and summarised within Section 7.6 of this ES chapter.
NPS EN-3 Paragraph 2.10.113. Where a site on which development is proposed includes, or has the potential to, include heritage assets with archaeological interest, the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation. These should be carried out using expertise where necessary and in consultation with the local planning authority, and should identify archaeological study areas and	The desk-based assessment is presented in Volume 3, Appendix 7.1: Historic Environment Desk-based Assessment of the ES **[EN010147/APP/6.5]**. Field evaluation in the form of geophysical survey has been undertaken and the results are presented in Volume 3, Appendix 7.3: Geophysical Survey Report of the ES **[EN010147/APP/6.5]**. The field evaluation has been carried out in consultation with the archaeological advisor to the local planning authorities and in accordance with an agreed and appropriate scheme of investigation.

Summary of NPS Requirement	How and where considered in the ES
propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets	
NPS EN-3 Paragraph 2.10.114 and 2.10.115. In some instances, field studies may include investigative work (and may include trial trenching beyond the boundary of the proposed site) to assess the impacts of any ground disturbance, such as proposed cabling, substation foundations or mounting supports for solar panels on archaeological assets. The extent of investigative work should be proportionate to the sensitivity of, and extent of, proposed ground disturbance in the associated study area.	A programme of trial trenching has been agreed with the archaeological advisor to the local planning authorities. The extent of this investigative work is proportionate to the sensitivity of, and extent of, proposed ground disturbance, within the Site.
NPS EN-3 Paragraph 2.10.116. Applicants should take account of the results of historic environment assessments in their design proposal	The results of the historic environment assessment have informed the final design of the scheme. Information on this is presented within **Section 7.8** of this ES chapter.
NPS EN-3 Paragraph 2.10.117. Applicants should consider what steps can be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting.	The results of the historic environment assessment have informed the final design of the scheme. Information on this is presented within **Section 7.8** of this ES chapter.
NPS EN-3 Paragraph 2.10.118 As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration should be given to the impact of large-scale solar farms which depending on their scale, design and prominence, may cause substantial harm to the significance of the asset.	The results of the historic environment assessment have informed the final design of the scheme. A detailed assessment of the potential impacts of the Project resulting from changes within the setting of designated heritage assets is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. A detailed assessment of the potential impacts of the Project resulting from changes within the setting of the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
NPS EN-3 Paragraph 2.10.119 Applicants may need to include visualisations to demonstrate the effects of a proposed solar farm on the setting of heritage assets.	The assessment of effects resulting from change within the setting of heritage assets has been undertaken with reference to the accurate representative visualisations presented in Volume 2, Figures 8.12 - 8.127 of the ES **[EN010147/APP/6.4]**.

The National Planning Policy Framework

7.2.9 The National Planning Policy Framework (NPPF) was published in 2012 and updated in 2018, 2019, 2021 and twice in 2023 (Ministry of Housing, Communities and Local Government, 2023). The NPPF sets out the Government's planning policies for England.

7.2.10 Policies regarding the historic environment are set out in Chapter 16 of the NPPF and further details of these policies are provided in section 1.3 of Volume 3, Appendix 7.1: Historic Environment Desk-Based Assessment of the ES.

7.2.11 **Table 7.2** sets out a summary of the NPPF policies relevant to this chapter.

Table 7.2: Summary of NPPF requirements relevant to this chapter

Policy	Key Provisions	How and where considered in the ES
Paragraph 200	Applicants should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting towards that significance.	A description of the baseline heritage assets is provided in Volume 3, Appendix 7.1: Historic Environment Desk-Based Assessment of the ES and summarised within Section 7.6 of this ES chapter.

7.2.12 The Planning Practice Guidance (PPG) (Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government, 2023) supports the NPPF and provides guidance across a range of topic areas.

7.2.13 The PPG provides advice on specific issues such as '*What is 'significance*' and '*What is the setting of a heritage asset and how should it be taken into account?*'. Further details of this guidance are provided in Section 1.3 of Volume 3, Appendix 7.1: Historic Environment Desk-Based Assessment.

Local planning policy

7.2.14 The relevant local planning policies applicable to the historic environment based on the extent of the study areas for this assessment are summarised in **Table 7.3**.

Table 7.3: Summary of local planning policy relevant to this chapter

Policy	Key Provisions	How and where considered in the ES
Adopted West Oxfordshire Local Plan 2031		
EH 9: Historic Environment	All development proposals should conserve and/ or enhance the special character, appearance and distinctiveness of West	Where possible, conserving and enhancing of heritage assets, including their settings, has been achieved through the design of the

Policy	Key Provisions	How and where considered in the ES
	Oxfordshire's historic environment, including the significance of the District's heritage assets, in a manner appropriate to their historic character and significance and in a viable use that is consistent with their conservation, in accordance with national legislation, policy and guidance for the historic environment.	Project as described in Section 7.8 of this ES chapter.
Adopted Vale of White Horse Local Plan 2031 Part 1		
Core Policy 39: The Historic Environment	The Council will work with landowners, developers, the community, Historic England and other stakeholders to ensure that new development conserves, and where possible enhances, designated heritage assets and non-designated heritage assets and their setting in accordance with national guidance and legislation.	Where possible, conserving and enhancing of heritage assets, including their settings, has been achieved through the design of the Project as described in Section 7.8 of this ES chapter.
Adopted Cherwell Local Plan 2011-2031		
ESD 15: The Character of the Built and Historic Environment	New development proposals should conserve, sustain and enhance designated and non-designated 'heritage assets' (as defined in the NPPF) including buildings, features, archaeology, conservation areas and their settings, and ensure new development is sensitively sited and integrated in accordance with advice in the NPPF and NPPG.	Where possible, conserving and enhancing of heritage assets, including their settings, has been achieved through the design of the Project as described in Section 7.8 of this ES chapter.

7.3 Consultation and Engagement

7.3.1 On 15 June 2023, the Applicants submitted a Scoping Report to the Planning Inspectorate, which described the scope and methodology for the technical studies being undertaken to provide an assessment of any likely significant effects for the construction, operation and maintenance and decommissioning phases. It also described those topics or sub-topics which are proposed to be scoped out of the EIA process and provided justification as to why the Project would not have the potential to give rise to significant environmental effects in these areas.

7.3.2 Following consultation with the appropriate statutory bodies, the Planning Inspectorate (on behalf of the Secretary of State) provided a Scoping Opinion on 24 July 2023. Key issues raised during the scoping process specific to the historic environment are listed in **Table 7.4**, together with details of how these issues have been addressed within the ES.

Table 7.4: Summary of scoping responses

Comment	How and where considered in the ES
Planning Inspectorate	
The Inspectorate agrees that impacts to buried archaeology will not occur during operation and this matter can be scoped out of the ES.	Noted.
The Inspectorate does not agree that impacts on buried archaeology would not occur during decommissioning as it in unknown what activities will occur during this process. The ES should describe anticipated decommissioning activities and assess potential impacts to buried archaeology where significant effects are likely to occur.	The likely impacts of the decommissioning phase of the Project on buried archaeological remains is assessed within Section 7.99 of this ES chapter.
A study area of 2 km is proposed for heritage assets on the basis that this is likely to be the zone of theoretical visibility (ZTV) although some designated heritage assets may be removed or included depending on the potential for impact and its zone of influence (ZoI). The Inspectorate notes that a 5 km study area is proposed for the Landscape and Visual assessment in Scoping Report paragraph 7.2.6 and it is not explained why these study areas are different when there is the potential for the same impacts e.g., visual and impacts to setting. The ZoI should also take into account potential impacts to the relationships between historic places – please refer to Historic England Guidance The Setting of Heritage Assets Historic Environment Good Practice Advice, Planning Note 3 (2017). The ES should ensure that the study area is based on the ZoI and where impacts to the historic environment are assessed in other relevant chapters such as the landscape and visual chapter, any differences in the applied study areas are explained and justified.	The potential impacts examined in the Landscape and Visual Assessment are not the same as for the Historic Environment, and therefore different study areas are appropriate. Visual impacts as examined within the Landscape and Visual Assessment are not the same as impacts to heritage assets arising from visual changes within their setting. Examination of heritage assets of the highest level of significance (World Heritage Sites, Scheduled Monuments, Grade I and II* listed buildings, Grade I and II* Registered Parks and Gardens) beyond the 2 km settings study area has been undertaken to review whether their significance could be harmed by the construction, operation and maintenance, and decommissioning of the Project. No such assets have been identified. The assessment of impacts and effects resulting from change with the settings of heritage assets has been undertaken in accordance with the relevant Historic England guidance document (Historic England, 2017). The extent of the study area has been agreed with Historic England. The assessment takes into account the relationships between historic places where this is relevant. A detailed assessment of the potential impacts of the Project resulting from changes within the setting of designated heritage assets is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES. A detailed assessment of the potential impacts of the Project resulting from changes within the setting of the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4:

Comment	How and where considered in the ES
	Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
The Scoping Report states that land that is not likely to be directly impacted will not be included in geophysical surveys. This includes areas that are set aside as 'buffers' around settlement areas or environmental mitigation areas. The Applicant should seek agreement on appropriate survey areas with the relevant consultees and ensure survey areas are adequate to accommodate the full design envelope so that the final iteration is fully assessed.	The extent of the geophysical surveys undertaken was set out in a Written Scheme of Investigation (WSI) agreed in advance with the Lead Archaeologist at Oxfordshire County Council (the relevant consultee). It includes all land within the Site where development may take place, including areas of ecological mitigation, where the current land use is suitable for this type of survey. The results of the programme of geophysical survey are presented in Volume 3, Appendix 7.3: Geophysical Survey Report of the ES **[EN010147/APP/6.5]**.
Impacts listed in Table 7.1 include changes to the wider historic landscape, but it is unclear how this has been defined/determined or whether this will be assessed in the proposed 2 km study area. . The ES should define what the wider historic landscape is and what study area is applied to this assessment.	The examination of the potential for changes to the character of the historic landscape looks at the Site and its immediate vicinity and reviews this in relation to the county of Oxfordshire. This is set out in Section 1.5 of Volume 3, Appendix 7.1: Historic Environment Desk-Based Assessment of the ES **[EN010147/APP/6.5]**. The historic landscape is defined in Section 7.6 of this ES chapter, and the study areas used are discussed in Section 7.4 of this ES chapter.
Indirect effects are not considered in Table 7.1. The ES should identify and assess any potential indirect effects on the historic environment, for example, changes in drainage patterns or compression of the ground from infrastructure which could affect below ground heritage assets or lead to subsidence of above ground buildings and monuments.	The potential for indirect effects such as those raised here has been discussed within the Project design team. The construction, operation, maintenance, and decommissioning of the Project would not result in any changes to drainage patterns, compression of the ground, or subsidence. No works are proposed that would affect surface water run-off or subsurface movement of water.
The baseline characterisation presented in Scoping Report paragraphs 7.1.4 to 7.1.14 omits the identification of listed buildings located at Woodstock. Additionally, Scoping Report paragraph 7.1.9 states that no part of the Project within which development is proposed would be within a designated Conservation Area however, Figure 8 of the Scoping Report identifies that the red line boundary interacts with identified Conservation Areas. The ES should present a full and accurate characterisation of the baseline environment and all sensitive receptors located within an appropriate study area.	The baseline characterisation presented in Scoping Report paragraphs 7.1.4 to 7.1.14 did not seek to identify all listed buildings within the proposed study area. Instead, it identified the presence of clusters of listed buildings within villages close to the perimeter of the Site. The historic core of Woodstock is located more than 1.3 km from the perimeter of the Site, however all listed buildings here have been considered within the assessment presented in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. Elements of two Conservation Areas fall within the Site. However, as identified within the Scoping Report no development is proposed within any part of either of these two Conservation Areas, nor any other Conservation Area. A full and accurate characterisation of the baseline environment and all sensitive receptors located within an appropriate study area is presented in Volume 3, Appendix 7.1: Historic Environment Desk-

Comment	How and where considered in the ES
	Based Assessment of the ES **[EN010147/APP/6.5]**and summarised within Section 7.6 of this ES chapter.
Historic England	
We would draw your attention in particular to the Blenheim World Heritage site which lies close to the northern area of the solar scheme. UNESCO and the Advisory Bodies to the World Heritage Committee (ICCROM, ICOMOS & IUCN) have recently issued *Guidance and Toolkit for Impact Assessment in a World Heritage context* – new guidance for assessing impacts from projects that could potentially affect World Heritage Sites: https://whc.unesco.org/en/news/2465/ The new guidance incorporates and replaces ICOMOS' *Guidance on Impact Assessment for Cultural World Heritage Properties* (2011) and IUCN's *World Heritage Advice Note on Environmental Assessment* (2013). It therefore now represents the most updated reference on conducting and reviewing impact assessments for all World Heritage properties. https://whc.unesco.org/en/guidance-toolkit-impact-assessments/.	A detailed assessment of the potential impacts of the Project resulting from changes within the setting of the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**. This assessment has been undertaken in accordance with the guidance document *Guidance and Toolkit for Impact Assessment in a World Heritage context*. (UNESCO *et al*, 2022)
We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. We (note) your intention to assess these assets. Assessment and evaluation of the historic (environment) should be carried out at as early stage as possible so that the information can feed into your design. For below-ground archaeological remains this process should include trial trenching.	The assessment of impacts and effects presented in Section 7.9 of this ES chapter includes assessment of effects in respect on non-designated heritage assets. Field evaluation in the form of geophysical survey has been undertaken and the results are presented in Volume 3, Appendix 7.3: Geophysical Survey Report of the ES [**EN010147/AP/6.5**]. Areas identified as containing significant buried archaeological remains will be retained within the Site as grassland and will not be impacted by the construction and operation of the Project. A programme of trial trenching has been agreed with the archaeological advisor to the local planning authorities and will be implemented as soon as possible.
We would strongly recommend that you involve the Conservation Officers of the relevant district councils and the archaeological staff at Oxfordshire County Council in the development of this assessment. They are best placed to advise on:	The archaeological staff at Oxfordshire County Council have been involved in the design and implementation of the programmes of field evaluation. Further details of this involvement are set out in **Table 7.5**.

Comment	How and where considered in the ES
local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. In particular please note that the site area may include archaeological remains which are of equivalent importance to designated remains.	
Given the topography of the surrounding landscape, this development is likely to be visible across a very large area and could, as a result, affect the significance of heritage assets at some distance from this site itself. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.	Examination has been made with regard to any designed heritage assets of the highest level of significance located outside of the 2 km settings study area whose heritage significance could be affected by a change within their setting resulting from the construction and operation of the Project. No such assets were identified.
It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this. In particular, photographs with wirelines/shaded areas showing location of solar array and other above ground units from key points should be included. Where there is possibility that glint and glare from the solar array could be visible within sensitive historic views we recommend a glint and glare assessment takes place and is included in submission documents.	The assessment of effects resulting from change within the setting of heritage assets has been undertaken with reference to the accurate representative visualisations presented in Volume 2, Figures 8.12 - 8.127 of the ES **[EN010147/APP/6.4]**. A glint and glare assessment has been undertaken and is presented in Volume 3, Appendix 4.4: Glint and Glare Assessment **[EN010147/APP/6.5]**.
The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage	The assessment presented in Section 7.9 of this ES chapter takes account of construction and operation and maintenance impacts. The potential for indirect effects such as those raised here has been discussed within the Project design team. The construction, operation, maintenance, and decommissioning of the Project would not result in any changes to drainage patterns, compression of the ground, or subsidence. No works are proposed that would affect surface water run-off or subsurface movement of water.

Comment	How and where considered in the ES
patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.	
The EIA should be cross-referenced and internally coherent - the cultural heritage chapter should not be a stand-alone exercise but should refer to and make use of the findings of the landscape and visual assessment. Significant heritage assets should be considered in the LVIA as sensitive receptors.	This chapter of the ES has been prepared in conjunction with the landscape and visual assessment. The consultants undertaking these assessments have worked closely on the iterations of the Project design.
It should not be assumed that magnetometry will be the best geophysics technique for all areas - other techniques may need to be considered.	The methodology for the geophysical survey was discussed and agreed with the archaeological advisor to the local planning authorities. The results of this survey are presented within Volume 3, Appendix 7.3: Geophysical Survey Report of the ES **[EN010147/APP/6.5]**.
If land for environmental mitigation is to include new planting this is potentially damaging to archaeological remains and the land may therefore require geophysical survey.	The geophysical survey has covered all areas of the Site that are suitable for this type of survey, including areas proposed for new planting. The results of this survey are presented within Volume 3, Appendix 7.3: Geophysical Survey Report of the ES **[EN010147/APP/6.5]**.
It does not seem possible to entirely dismiss the possibility of damage to archaeological deposits during decommissioning, especially at a distance of 40 years into the future. Some consideration should be given to this.	Mitigation measures to prevent damage to buried archaeological remains during decommissioning are presented within Table 3.1 in the Outline Decommissioning Plan **[EN010147/APP/7.6.4]**.
Although views and visibility are an important element of setting, HE guidance is clear that our experience is also influenced by 'our understanding of the historic relationship between places.' Historic England 2017,The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3, p.2. To give an example, the contribution that rural environs make to a heritage asset's significance (e.g. to a deserted medieval village or medieval moated site) is not negated because a hedge separates the asset from those environs. Therefore a change to those rural environs is a potential impact on the significance of the asset.	The assessment presented in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]** takes account of this point.
Oxfordshire County Council	

Comment	How and where considered in the ES
7.1.18 states that any land considered to have potential for buried archaeological features may require further archaeological investigations. We would however highlight that geophysical survey on its own cannot be relied upon to identify all possible archaeological features and there are numerous examples within the county where significant archaeological sites have been identified from field evaluation which were not visible on geophysical surveys. As such we would advise that an archaeological evaluation will need to be undertaken across any areas of the site that are likely to be disturbed by this development. This evaluation would need to be undertaken in advance of the determination of any permission for the site in order that the impacts of this proposed development are fully understood when making a decision. The results of this evaluation will need to be incorporated into the cultural heritage chapter of the PEIR.	Field evaluation in the form of geophysical survey has been undertaken and the results are presented in Volume 3, Appendix 7.3: Geophysical Survey Report of the ES **[EN010147/APP/6.5]**. Areas identified as containing significant buried archaeological remains will be retained within the Site as grassland and will not be impacted by the construction and operation of the Project. A programme of trial trenching has been agreed with the archaeological advisor to the local planning authorities and will be implemented as soon as possible. If any additional areas are found to contain significant buried archaeological remains, a methodology for the protection of such remains will be agreed with the archaeological advisor to the local planning authorities. This could include removal of such areas from the development (as with the areas already identified) or could be through the implementation of a 'no-dig' approach to construction in these areas.
7.1.33 states that there will be no effect on buried archaeological remains from decommissioning activities. These activities however do have the potential to impact on archaeological remains particularly when removing cables and areas of hardstanding which are likely, without care and monitoring, remove previously undisturbed areas outside of the original impact. This potential impact should be assessed within the PEIR.	Mitigation measures to prevent damage to buried archaeological remains during decommissioning are presented within Table 3.1 in the Outline Decommissioning Plan **[EN010147/APP/7.6.4]**.
Cherwell District Council	
It is noted that the study area is 2km from the boundary of the site and this appears to be quite a small area compared to the size of the site, although it is acknowledged that the zone of visibility will potentially extend any assessment beyond this.	Examination has been made with regard to any designated heritage assets of the highest level of significance located outside of the 2 km settings study area whose heritage significance could be affected by a change within their setting resulting from the construction and operation of the Project. No such assets were identified.
There are three further conservation areas within Cherwell District that sit relatively close to the site that should be highlighted, Rousham, Shipton-on-Cherwell and Hampton Gay.	All Conservation Areas wholly or partially within the 2 km settings study area have been considered within Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**.

Comment	How and where considered in the ES
Furthermore, non-designated Heritage Assets are identified within the Conservation Area Appraisals, and it is suggested that these should also be considered.	Non-designated heritage assets have been considered within the assessment presented in Section 7.9 of this ES chapter.
Vale of White Horse District Council	
Given the topography of the landscape surrounding the southern of the proposed sites it is likely that impacts may go beyond the 2km site boundary limit and will need to be informed by a carefully plotted ZTV (following the recommendations below on the methodology for defining the ZTV). Any extension beyond the 2km area because of the ZTV assessment should include potential non-designated heritage assets as well as designated heritage assets where these have a specific historic relationship to the landscape or area affected. This should extend into those areas within the Vale that are part of the Oxford City View Cones policy.	Examination has been made with regard to any designated heritage assets of the highest level of significance located outside of the 2 km settings study area whose heritage significance could be affected by a change within their setting resulting from the construction and operation of the Project. This also included a review looking for any other heritage assets with a clear historic relationship to the Site. No such assets were identified.
Bladon Parish Council	
The Environmental Statement (ES) should ensure that Woodstock and the WHS of Blenheim Palace are also considered when carrying out assessments for the 'Central Site'.	A detailed assessment of the potential impacts of the Project resulting from changes within the setting of the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**. All designated heritage assets at Woodstock have been considered within the assessment presented in Volume 3, Appendix 7.5: Settings Assessment of the ES.
Para 7.1.6 and 7.1.7 – these paragraphs provide a list of villages that are close to the Site perimeter and have concentrations of Listed buildings as well as other Listed buildings close to the perimeter but outside of these villages. It does not mention Woodstock in its assessments or explain why Woodstock is not included in the list of villages close to the perimeter of the Site when it falls within the 2km Study Area, as stated in paragraph 7.1.24.	The baseline characterisation presented in Scoping Report paragraphs 7.1.4 to 7.1.14 did not seek to identify all listed buildings within the proposed study area. Instead, it identified the presence of clusters of listed buildings within villages close to the perimeter of the Site. The historic core of Woodstock is located more than 1.3 km from the perimeter of the Site, however all listed buildings here have been considered within the assessment presented in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**.
Cassington Parish Council	
Although the Blenheim Palace World Heritage Site is just outside the utility-scale solar power station, both the site and its setting within rural	A detailed assessment of the potential impacts of the Project resulting from changes within the setting of the Blenheim Palace World Heritage Site is presented in Volume 3, Appendix 7.4:

Comment	How and where considered in the ES
Oxfordshire, including nearby greenbelt should be assessed with respect to impact on World Heritage Status. Landscape is an important aspect of granting of World Heritage Status and this proposal has a major impact on the surrounding landscape which is the setting of the site.	Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
We note that whilst the West Botley Utility-Scale Solar Power Station has been set outside of the Conservation Area of Cassington Significant Views from the Conservation Area, mainly pointing to the northwest will be strongly adversely affected by the development (WODC, 2007). Views from all the mentioned designated Conservation Areas should be assessed for visual impact from the West Botley proposal. We note in 7.1.24 that the Zone of Theoretical Visibility set at 2 km from the boundary of heritage assets.	Defined significant or important views from Conservation Areas are considered within the assessment presented in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**.
We also note the presence of Frogwelldown Lane on the western edge of Yarnton which has been in use at least since the Middle Ages. This lane was part of the old Oxford to Witney road and is notable as the historic route of retreat of the army of Charles I from Oxford during the English Civil War. The lane currently runs from the edge of Yarnton to the Burleigh Road.	The location and historical importance of Frogwelldown Lane is identified within Volume 3, Appendix 7.1: Historic Environment Desk-Based Assessment of the ES **[EN010147/APP/6.5]**.
Cumnor Parish Council	
Council notes that the Grade II Upper Whitley Farm sits on high ground 300m to the SE of the proposed site boundary.	An assessment of the likely effect relating to the change within the setting of the Grade II listed Upper Whitley Farmhouse is presented within Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**.
Council would wish the geophysical survey to include the 'buffer areas' (para 7.1.17) as these too will be subject to disturbance by, for example, the erection of security fences, CCTV towers and associated cabling.	The geophysical survey has covered all areas of the Site that are suitable for this type of survey, including all 'buffer areas'. The results of this survey are presented within Volume 3, Appendix 7.3: Geophysical Survey Report of the ES **[EN010147/APP/6.5]**.
Given the applicant shows (Figure 8 page 169) two alternate underground high voltage cable routes crossing the River Thames either side (to the west and east) of the historic Swinford toll bridge (Grade II* listed), located on the B4044 at the NW extremity of the Parish where it meets Eynsham	An assessment of the likely effect relating to the change within the setting of the Grade II* listed Swinford Bridge is presented within Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**.

Comment	How and where considered in the ES
Parish, Council would wish the Historic Environment report to include an explicit assessment of the impact on Swinford toll bridge.	
Hanborough Parish Council	
HPC repeats that its concern is more about what is proposed to be "scoped out" from assessment than what PVDP is suggesting will be included in any ES. Thus, the suggestion in paragraph 7.1.33 that there would be no need to include consideration of effects upon buried archaeology during any decommissioning stage of the Project is considered to be quite inadequate. First, there is as yet no detail at all as to what decommissioning would actually entail. Indeed, there appears to be no certainty that the Applicant, PVDP, would even have any residual interest in the BWSF site at all, let alone being in a position to be responsible for decommissioning. Second, it appears to be fanciful to think that once any damage has been inflicted on buried archaeology during any construction phase, any further damage during decommissioning will not mater. Decommissioning must be as likely to involve construction-type vehicles and movement across the Site. HPC considers that the possible effects of all vehicle work on the Site must be scoped into assessment including the decommissioning phase.	Mitigation measures to prevent damage to buried archaeological remains during decommissioning are presented within Table 3.1 in the Outline Decommissioning Plan **[EN010147/APP/7.6.4]**.

7.3.3 Following scoping, consultation and engagement with interested parties specific to the historic environment has continued. This has included several meetings with the archaeological advisor to the local planning authorities in order to agree appropriate strategies for field evaluations, and with Historic England regarding potential impacts on the Blenheim Palace World Heritage Site.

7.3.4 The PEIR was issued to inform the statutory consultation carried out on the Project between 30 November 2023 and 8 February 2024. It presented the preliminary findings of the EIA process for the Project at that time. The consultation responses specific to the historic environment and the way in which they have been taken into account in this ES chapter are set out in **Table 7.5**Table 7.5 All consultation completed is documented in the Consultation Report **[EN010147/APP/5.1]**.

Table 7.5: Summary of consultation relevant to this chapter

Date	Consultee and type of response	Issues Raised	How and where considered in the ES
January 2024	Historic England	The meeting was held to discuss Historic England's views regarding the Preliminary Heritage Impact Assessment for the Blenheim Palace World Heritage Site (as set out within the PEIR).	The points raised within the discussion have been considered, Where appropriate, these have been responded to within the assessment presented as Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2023	Lead archaeologist – Oxfordshire County Council	The Applicant presented an overview of their proposed approach to the assessment of impacts and effects on the historic environment. The areas for HER data acquisition were agreed. The methodologies for geophysical survey were discussed.	The geophysical survey has covered all areas of the Site that are suitable for this type of survey, including all 'buffer areas'. The results of this survey are presented within Volume 3, Appendix 7.3: Geophysical Survey Report of the ES **[EN010147/APP/6.5]**.
November 2023	Lead archaeologist – Oxfordshire County Council	Non-designated heritage assets which are of equivalent significance to scheduled monuments should be considered subject to the policies for designated heritage assets – footnote 68 of the NPPF.	This point has been addressed within the design of the Project and is discussed within Section 7.8 of this ES chapter.
February 2024	Oxfordshire County Council – PEIR response	Impacts on Conservation Areas don't appear to have been assessed on the basis that development is not proposed within the Conservation Area boundary. However, it is not only the direct impact on Conservation Areas that need to be considered but also their setting. The development comes in close proximity of several Conservation Areas or is potentially visible from them. The impact on Conservation Areas or their setting does not appear to have been assessed in the Historic Environment chapter or the Landscape and Visual Resources chapter of the PEIR. LVIAs often include representative viewpoints from conservation areas to demonstrate the impact of the development on these designated areas and to demonstrate impacts on residents of these settlements.	An assessment of the likely effects relating to the changes within the settings of Conservation Areas is presented within Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. This assessment has been informed, where appropriate, by reference to the visualisations presented in Figures 8.12 - 8.127 of the ES **[EN010147/APP/6.4]**.

Date	Consultee and type of response	Issues Raised	How and where considered in the ES
February 2024	Oxfordshire County Council – PEIR response	Table 7.1 does state that the field evaluation highlighted in the NPS requirement and local plan policies has been undertaken and this is misleading and refers only to the geophysical phase. This chapter does however also make clear that an archaeological trenched evaluation will be undertaken.	The field evaluation referenced in Table 7.1 of the PEIR comprised geophysical survey, which is one form of field evaluation. The results of the geophysical survey have been tested through a programme of archaeological trial trenching which commenced in August 2024.
February 2024	Oxfordshire County Council – PEIR response	The overall submission also states that allowance for preservation in situ of significant remains will be made and areas of high significant archaeological remains will be removed from the development. This PEIR also sets out that the individual panels will be connected with string invertors rather than individual cable trenches along each line of panels which will reduce the potential impact on below ground archaeological deposits and that the panels themselves can be mounted on concrete shoes where required in order to preserve areas of significant archaeology. This will allow the evaluation phase to be targeted on areas of impact as set out in this document.	The geophysical survey and review of other data has resulted in the identification of 42 areas containing archaeological remains of probable national or regional significance. These areas have been removed from the developable area and will be protected during construction and then retained as grassland. In areas containing archaeological remains of probable less than regional significance, cables will be placed within ducts that sit on the current ground surface therefore reducing the potential for impact on such remains. This approach is explained within Section 7.8 of this ES chapter.
February 2024	Vale of White Horse Council – PEIR response	The PEIR suggests no non-designated heritage assets have been identified by VWHDC (Section 7.5.3), but it is not clear if the Cumnor Conservation Area Appraisal 2011 has been referred to, which does include some locally interesting buildings within the designated area that should be included for assessment. The document can be accessed via the VWHDC website and should be included in an updated ES.	The Cumnor Conservation Area Appraisal 2011 was referenced in Volume 3, Appendix 7.1: Historic Environment Desk-based Assessment of the PEIR, and is similarly referenced in Volume 3, Appendix 7.1: Historic Environment Desk-based Assessment of the ES **[EN010147/APP/6.5]**. The scoping exercise described within Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]** found that the construction, operation and maintenance, and decommissioning of the Project would not have any impact on the significance of the Cumnor Conservation Area. The same assessment

Date	Consultee and type of response	Issues Raised	How and where considered in the ES
			applies to any buildings of local interest within that Conservation Area.
February 2024	Vale of White Horse Council – PEIR response	It is agreed that there would be no direct impacts to designated heritage assets (built heritage only, excluding archaeology). The landscape character changes as evidenced by the ZTV indicates that there is likely to be an impact to heritage assets and the way that they are understood within their setting, given the topography of the site and its open, rural character. Refinement of the final scheme, specifically the scale, design and location of the substation, will influence the scale of impacts and relevant mitigation needed. Whilst direct physical impacts are not anticipated, the overall level of impact will still need to be assessed in the context of a refined final scheme.	The assessment of impacts and effects arising from change within the settings of heritage assets is presented within Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. The assessment in respect of the NGET substation is based on the parameters set out in Volume 1, Chapter 6: Project Description of the ES **[EN010147/APP/6.5]**, and takes account of the mitigation proposed within the Outline Landscape and Ecology Mitigation Plan (oLEMP) **[EN010147/APP/7.6.3]**.
February 2024	West Oxfordshire District Council - PEIR response	Upon submission of the Environmental Statement, the applicant should provide a description of the heritage assets affected by the proposed development and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage assets and no more than is necessary to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the applicant should have consulted the relevant Historic Environment Record. It is noted that there is further assessment to be undertaken in this regard, to fully understand the impact on the setting and significance of heritage assets.	The assessment of impacts and effects arising from change within the settings of heritage assets is presented within Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. The Oxfordshire Historic Environment Record has been consulted and the results are reported on in Volume 3, Appendix 7.1: Historic Environment Desk-based Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	West Oxfordshire District Council - PEIR response	Key to this will be the impact on the Blenheim Palace WHS. The Blenheim Palace WHS is an internationally significant heritage asset and makes a significant contribution to the historic character and cultural heritage of West Oxfordshire as well as being of key importance to the local economy.	The impact on the Blenheim Palace WHS has been assessed in line with the appropriate guidance (UNESCO *et al*, 2022) and through consultation with Historic England. The results of this assessment are presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.

Date	Consultee and type of response	Issues Raised	How and where considered in the ES
February 2024	West Oxfordshire District Council - PEIR response	It is noted that the proposed masterplan has taken care to exclude development from key viewpoints into and out of the WHS and that a heritage impact assessment will be prepared to provide detail of the potential significant effects on the WHS.	The heritage impact assessment is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	West Oxfordshire District Council - PEIR response	Paragraph 7.9.4.1 of the PEIR recognises that the Blenheim Palace WHS does not have a formally identified buffer zone, but as with any heritage asset it has a setting and changes within that setting may harm the significance of the asset. It should be noted that the reason for Blenheim Palace WHS not having a formally identified buffer zone is that the WHS is already provided with a high degree of protection for the protection of the WHS Outstanding Universal Value (OUV). Given the strong statutory and local plan protection for heritage assets, the presence and extent of the Oxford Green Belt and natural environment features such as the Cotswolds National Landscape, coupled with the robust policies set out in the West Oxfordshire Local Plan 2031, an additional level of designated protection such as a buffer zone is regarded as unnecessary. Regard should therefore be had as to whether development proposals within the landscape surrounding the WHS and whether development in the Green Belt in particular would undermine the additional policy protection provided for the setting of the Blenheim Palace WHS.	These points are addressed within Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]** and also within Volume 1, Chapter 5: Alternatives Considered of the ES **[EN010147/APP/6.3]**.
February 2024	West Oxfordshire District Council - PEIR response	The current proposals for the Botley West Solar Farm provide a range of mitigation measures to minimise impacts on designated and non-designated heritage assets in proximity to the site. These measures include the avoidance and exclusion of heritage assets from the permanent project developable footprint and the adoption of no-dig approaches to development in areas of archaeological sensitivity.	The mitigation measures established for the avoidance and/or reduction of potential impacts on significant archaeological sites are set out within Section 7.8 of this ES chapter.
February 2024	West Oxfordshire District Council - PEIR response	The preparation of a Landscape Management Plan will include details of mitigation planting around the development, including the number, location, species and details of management and maintenance of planting. The Applicant explains that where	The details of the proposed mitigation planting for the Project are set out in the oLEMP **[EN010147/APP/7.6.3]**.

Date	Consultee and type of response	Issues Raised	How and where considered in the ES
		practical, landscape mitigation planting will be established as early as reasonably practicable in the construction phase. WODC cannot comment on the suitability and effectiveness of proposed mitigation planting at this stage and will await details of the Outline Landscape and Ecology Management Plan. The applicant should have regard to the comments made on the proposed masterplan, to identify where mitigation and enhancement measures should be focused, to minimise negative impact on the historic environment and heritage assets.	The proposed planting has been considered within the mitigation measures used for the assessment of impacts and effects presented in Section 7.9 of this ES chapter, also within Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	West Oxfordshire District Council - PEIR response	It is recognised that further archaeological assessment is required to assess the required mitigation of impacts on buried archaeological remains, It is the view of the council that in order to minimise harm to archaeological remains, further areas should be avoided and sufficiently buffered.	A total of 42 areas containing significant buried archaeological remains have been avoided and sufficiently buffered within the Project design as shown on the Illustrative Masterplan presented as Figures 2.1 – 2.3 within Volume 2, Figures of the ES **[EN010147/APP/6.4]**. The mitigation measures established for the avoidance and/or reduction of potential impacts on significant archaeological sites are set out within Section 7.8 of this ES chapter.
February 2024	West Oxfordshire District Council - PEIR response	No further mitigation is proposed to address cumulative impacts of the proposal with other planned developments in the area. The applicant claims that refinements to the project design will enable the magnitude of impacts to be reduced and the consequent level of effect to also be reduced to a point where it is no longer significant. WODC are concerned that the proposed mitigation measures will not be sufficient to adequately address the impacts on the significance of heritage assets.	The assessment of likely cumulative impacts on heritage assets is presented in Section 7.10 of this ES chapter. No significant cumulative effects have been identified.
February 2024	West Oxfordshire District Council - PEIR response	Although development has been removed from the conservation areas at Bladon and Church Hanborough, WODC consider that there is likely to be a residual impact on heritage assets in these locations, particularly on the setting of the conservation areas and	The assessment of impacts and effects arising from changes within the settings of designated heritage assets is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES

Date	Consultee and type of response	Issues Raised	How and where considered in the ES
		listed buildings. The fact that Churchill's grave is situated in Bladon Church should also be given due consideration.	**[EN010147/APP/6.5]**. This includes impacts and effects on Conservation Areas and listed buildings. The presence of Churchill's grave in the churchyard at Bladon is highlighted within that assessment.
February 2024	West Oxfordshire District Council - PEIR response	In terms of the Church Hanborough Area, the proposed masterplan includes opportunities for enhancement within the Conservation Area, although it is not clear what the nature of these enhancements might be at this stage. The applicant proposes a permissive path to the south of the Conservation Area which will improve connectivity through the countryside and linking to existing public rights of way to the east of Lower Road. As such, according to the proposed masterplan, it will be possible to move between the Conservation Areas at Church Hanborough and Cassington through an almost unbroken arrangement of panels.	The Illustrative Masterplan is presented as Figures 2.1 – 2.3 within Volume 2, Figures of the ES **[EN010147/APP/6.4]**. It shows a proposed permissive path along the southern edge of the Church Hanborough Conservation Area, with grassland to the north (within the Conservation Area) and solar panels to the south, separated from the permissive path by a new hedgerow. The permissive path continues on the eastern side of Lower Road, passing between two areas of solar panels with new hedgerows on either side of the path. The permissive path then enters the floodplain of the River Evenlode and crosses two channels of the river via new footbridges before linking to the existing public rights of way network. Where solar panels are proposed within land adjacent to the public rights of way, new hedgerows would be planted and existing ones reinforced where gaps currently exist. The proposed permissive path therefore establishes a new link between the Conservation Areas at Church Hanborough and Cassington.
February 2024	West Oxfordshire District Council - PEIR response	Regard should be had to the impact on the setting of the Conservation Areas and Grade I listed churches at both Cassington and Church Hanborough as a result of the scale and extent of the proposed development within the Central Area.	The assessment of impacts and effects arising from changes within the settings of designated heritage assets is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. This includes impacts

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			and effects on Conservation Areas and listed buildings.
February 2024	West Oxfordshire District Council - PEIR response	The PEIR Non Technical Summary (para 6.2.15) explains that effects on designated heritage assets as a result of change within their setting have been assessed as not significant. These effects are fully reversible in that they would cease following decommissioning of the Project.	The assessment of impacts and effects arising from changes within the settings of designated heritage assets is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. No significant adverse effects have been identified. All impacts would be fully reversible following decommissioning of the Project.
February 2024	West Oxfordshire District Council - PEIR response	WODC is concerned that there will be negative impacts on the setting of Conservation Areas and Listed buildings at Church Hanborough and Cassington. Consideration should be given to how these impacts can be minimised or effectively mitigated, having regard to the comments on the masterplan set out above.	Negative impacts on the settings of designated heritage assets at Church Hanborough and Cassington, including Conservations Areas and listed buildings, have been minimised through the design of the Project as indicated in the Illustrative Masterplan presented as Figures 2.1 – 2.3 within Volume 2, Figures of the ES. This has included removal of solar panels from certain areas and also mitigation planting as set out in the oLEMP **[EN010147/APP/7.6.3]**.
February 2024	Historic England – PEIR response	It is important that any statements made within the PEIR are clearly supported by evidence. Where statements are predictive, due to the preliminary nature if the document and supporting assessments, it should be clear that the statements need to be revised for the ES. This includes revisions beyond a predicated range e.g. where impacts are predicted as 'Up to Low'', further assessment may identify impacts that are greater than low.	The updated assessment of likely impacts on heritage assets is presented in Sections 7.9 and 7.10 of this ES chapter, with additional information in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. A separate heritage impact assessment in respect of potential impacts on the Blenheim Palace WHS is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.

Date	Consultee and type of response	Issues Raised	How and where considered in the ES
February 2024	Historic England – PEIR response	The Non-technical Summary (NTS) concludes that 'No significant effects in respect of any aspect of the historic environment have been identified within the PEIR.' (6.2.14). The Phase Two Community Consultation Leaflet repeats that statement. This is not supported by the contents of the PEIR. Chapter 7 on heritage assesses that impacts on designated heritage assets may up to moderate adverse, which is significant (7.9.5.6). (These impacts would be from change to the setting of the assets – the PEIR seems confident that the impacts can be reduced (7.9.5.7) but this is premature when detailed assessment has not been carried out).	The detailed assessment of impacts and effects arising from changes within the settings of designated heritage assets is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. No significant adverse effects have been identified.
February 2024	Historic England – PEIR response	Table 7.17 summarises potential environmental effects and monitoring. Impacts on archaeological remains are assessed as low, leading to minor adverse effect (not significant). This may need to be revised when the archaeological trench evaluation work has been carried out. We also note that some cable trenches are in road verges where evaluation is not possible and opportunity for mitigation by design (if the trench passes through archaeological remains) will be very limited. A greater effect could therefore also occur in that situation.	A total of 42 areas containing significant buried archaeological remains have been avoided and sufficiently buffered within the Project design as shown on the Illustrative Masterplan presented as Figures 2.1 – 2.3 within Volume 2, Figures of the ES **[EN010147/APP/6.4]**. The mitigation measures established for the avoidance and/or reduction of potential impacts on significant archaeological sites are set out within Section 7.8 of this ES chapter. Options for reducing impacts on buried archaeological remains during the construction of the 275 kV cable route are set out in Section 7.9 of this ES chapter. The assessment of likely impacts on buried archaeological remains concludes that any effects would be of minor adverse significance, i.e. not significant.
February 2024	Historic England – PEIR response	The project has an anticipated life span of 42 years and is described within the PEIR as temporary. The PEIR should approach this in a more nuanced way as the solar installation will be experienced by many people as permanent (e.g. for all of their remaining lifetime). In discussions of setting of heritage assets,	The consent sought for the Project is time-limited and covers the periods of construction, operation and maintenance, and decommissioning. UK government policy is that time-limited consents, where granted, should be

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		experience is a key factor and there are a range of experiences to be considered. These range from a single visit to Blenheim Palace, to a local person who has known the area all of their life and walks regularly in the countryside. The predicted life span of the project may be 42 years but can this be guaranteed for a point so far in the future when planning regimes and technology will be very different. The solar installation could have its life extended or be replaced by a different technology, particularly considering that it will have the advantage of already being connected to the grid. All these points should be considered.	described as temporary regardless of the duration of the consent (e.g. National Policy Statement for Renewable Energy Infrastructure (EN-3), paragraph 2.10.66). Notwithstanding this point, the assessment of impacts and effects presented in Section 7.9 of this ES chapter uses the terms 'short-term', 'medium-term', 'long-term' and 'permanent' to describe the duration of impacts, and not the term 'temporary'.
February 2024	Historic England – PEIR response	Throughout the PEIR many impacts are described as fully reversible (e.g. see NTS 6.7.15). Taking a cautious approach, we would note that such changes as planting to screen the solar plant are potentially reversible but in practice this is unlikely to happen after over forty years of growth. Although planting may be ecologically beneficial it is not always beneficial within the setting of heritage assets and could be a permanent effect.	This issue is discussed in some detail within in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**. It is correct that some of the landscape mitigation planting is unlikely to be removed at decommissioning due to its ecological benefits.
February 2024	Historic England – PEIR response	There is very limited discussion in the PEIR (and the HIA) of predicted positive impacts on heritage assets, or of benefits that could accrue from the scheme which would provide community benefit or directly benefit the WHS. There would appear to be scope for positive impacts including support of the WHS by the wider estate as has traditionally been the case.	Positive benefits with regard to buried archaeological remains are set out in Section 7.9 of this ES chapter. Positive benefits with regard to the Blenheim Palace WHS are set out in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**. Additional community benefits accruing from the Project are identified in Volume 1, Chapter 15: Socio Economics of the ES **[EN010147/APP/6.3]**.
February 2024	Historic England – PEIR response	<u>Impacts on the Blenheim Palace WHS</u> This is covered in a preliminary Heritage Impact Assessment (HIA) which is included within the PEIR as Appendix 7.4. The HIA is recommended in the Guidance and Toolkit for World Heritage	Engagement with Historic England has been ongoing throughout the reparation of the HIA, which is presented as Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage

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		Assessments in a World Heritage Context (UNESCO 2022). We welcome the use of this toolkit, and the use of the Blenheim Palace World Heritage Site Revised Management Plan 2017, Historic Landscape Management Ltd 2017 (WHSMP). We also welcome the commitment to an iterative approach and ongoing engagement with historic England. Detailed advice on the preliminary HIA has recently been given to the applicant for consideration and what follows is a summary of that advice.	Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	Historic England – PEIR response	Historic England has emphasised that impacts on the OUV of the WHS must be approached in a manner appropriate to this highest form of heritage designation. Great emphasis must be placed on avoiding (preferably) or minimising impacts through design or site selection (for example) rather than relying on mitigation. We remain concerned that throughout the HIA, impacts on the WHS are described as 'minor adverse', 'not significant' or 'acceptable'. The HIA process (in line with UNESCO guidance) should provide a more detailed understanding of impacts on OUV such that it identifies impacts that would not be considered acceptable in a WHS context (and are therefore potentially adverse and significant).	These points have been addressed within the assessment presented as Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**. This sets out how the design of the Project has sought to avoid impact where possible.
February 2024	Historic England – PEIR response	The question of considering alternative sites is also relevant here. The HIA does not currently include the detail on how the current site configuration has been arrived at. The extent to which a given negative impact is avoidable is therefore unclear. The process of identifying certain land parcels as potentially suitable to accommodate the proposed development is described in the HIA as being based on the principle of avoidance of significant adverse effects following the principle of EIA. In the absence of an HIA until this stage, and at this stage only at screening level, we would be cautious about any conclusions that have been reached on that basis.	These points have been addressed within the assessment presented as Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**. This sets out the consideration of alternative sites.
February 2024	Historic England – PEIR response	The attributes of the Overall Universal Value (OUV) of the WHS and the elements that support those attributes have not always	These points have been addressed within the assessment presented as Volume 3, Appendix

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		been given sufficient weight or have not been sufficiently assessed both in themselves, and in terms of the predicted impact on them. We therefore advise that the HIA is not currently sufficiently robust to support the conclusions reached, such as: *no element of the defined OUV of the Blenheim Palace WHS would be affected by the Project*, and *…lead the Applicant to conclude that overall there is no impact - described as a neutral effect in the overall evaluation table above.*	7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	Historic England – PEIR response	The scheme is entirely located outside of the WHS and its enclosing stone wall, meaning that the most important attributes, values and impacts to be considered are those concerning how the wider setting of the WHS contributes to its OUV. The Impact Identification Table of the HIA sets out attributes and predicted impacts on them. We advise that the table needs considerable revision, as follows: • Consider attributes individually before considering any groups of attributes. • Entries under impact should be directly relatable to the attribute and there should not be what appears as cut and paste. For example, the first attribute is: *It remains the home of the same aristocratic family, the successive Dukes of Marlborough, for whom it was built.* Under Impact the entry reads: *No direct effect upon the Palace or grounds within its walled boundary. No material change in traffic flows is predicted above existing levels on surrounding road network, nor significant change to visual impacts or landscape character or setting. Once decommissioned, land to return to agricultural use.* This does not seem relevant, and the same text is then repeated for various entries in the table. • Attributes of the OUV are supported by a number of elements. In relation to setting, these are given in 5.02 of the WHSMP; Appendix III: Setting Study. One highly relevant	These points have been addressed within the assessment presented as Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.

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		element of Blenheim's OUV: *The character of the setting as traditional English countryside, dotted with picturesque villages mainly built using a uniform palate of materials,* is mentioned in the HIA but then not assessed. • The table could usefully address the questions of authenticity and integrity so that the existing baseline can be understood, and the potential change.	
February 2024	Historic England – PEIR response	The WHSMP mentions solar farms under 'Managing the setting' notes on page 44. *Tall developments on the skyline, or large-scale development (particularly those of a non-residential nature which tend to be bulkier and non-vernacular, for example industrial development; wind turbines; solar farms etc) could detrimentally influence the character of the adjoining rural areas.* We advise that this impact has been given insufficient weight in the HIA, by not taking adequate account of attributes (see above), but also because the rural nature of the setting of the WHS has a particular historic value. In this context it is important that change to setting is considered in the widest sense, without over-reliance on consideration of intervisibility - we consider this to be a weakness of the HIA current draft.	These points have been addressed within the assessment presented as Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	Historic England – PEIR response	The wider setting of the park, part of the Blenheim Estate, has traditionally supported and protected what is now the WHS. Change to the setting has the potential to have a negative impact on the understanding of this close historic relationship if the rural character is eroded. This point needs to be considered in relation to the impact on the historic landscape character in the HIA (and PEIR) where the value of the historic landscapes may be higher than the current assessment of 'Generally low'. Enclosure landscapes, which are a large proportion of the areas considered, were enclosed due to the influence of the Dukes of Marlborough and they therefore have value in relation to the WHS which is higher than their intrinsic value.	These points have been addressed within the assessment presented as Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**, and within the assessment set out in Section 7.9 of this ES chapter.

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February 2024	Historic England – PEIR response	With regard to views, the HIA has assessed the impact on the WHS from two sites: the Column of Victory and Blenheim Palace; these are tightly defined. The WHS boundary is obviously far larger than that. Page eight states that 'Indeed, no part of the Site is visible from any location within the WHS'. The HIA will need to set out what other viewpoints have been assessed to support this statement. Chapter 4 of Appendix III of the WHSMP sets out a number of key and secondary views which should be considered. Whilst views out are limited now, it is important to remember the forty-two year lifetime of the scheme, especially where existing tree cover is to be relied on. Where there are views with less dense tree screening, the impact on these views and the natural life of the tree screening should be examined.	These points have been addressed within the assessment presented as Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	Historic England – PEIR response	We advised previously that the LVIA and HIA would need to be closely connected. The assertions in the HIA regarding potential visibility of the proposed development are presented, currently, without the detailed supporting evidence from the LVIA. We would recommend that you review the relevant sections of the PEIR (Chapter 8 and Figures) to understand the scope of representative viewpoints incorporated and to assess whether representative viewpoints are a robust basis for assessment of visual impacts relevant to OUV.	These points have been addressed within the assessment presented as Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**. Further visualisations are being prepared following consultation with Historic England and agreement of appropriate Viewpoints. These will be reviewed against the current detailed assessment of impacts and effects arising from changes within the settings of designated heritage assets which is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	Historic England – PEIR response	Positive impacts and benefits, including heritage benefit have already been mentioned above as being inadequately covered. This point applies particularly to the WHS, where communal value is part of the OUV and community benefit is therefore clearly desirable.	These points have been addressed within the assessment presented as Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	Historic England – PEIR response	Heritage assets outside of the World Heritage Site	The detailed assessment of impacts and effects arising from changes within the settings of

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		Individual designated heritage assets both inside and outside of the WHS have not yet been assessed (7.9.5.3) so our comments are limited at this time. We would have expected a more realistic and detailed assessment of the potential impacts of the proposals on these designated heritage assets to have been provided at this stage. We however do welcome the intention to avoid direct impacts on designated assets, meaning that the focus of future assessment will be on impact caused by change to their settings. On this matter paragraph 7.9.5.4 is too generalised and the term 'reasonable contribution' is too woolly to be useful. (7.9.5.4 *For most designated heritage assets, the greatest part of their significance comes from their physical fabric. However, for some designated heritage assets their setting may make a reasonable contribution to their significance.*) As noted above, the Non-technical summary is not in step with the Heritage Chapter 7 - which predicts that: *Overall, the magnitude of the adverse impact is up to **low** and the sensitivity of the receptor is up to **high**. The effect will, therefore, be of up to **moderate adverse** significance, which is significant.* (7.9.5.6). The chapter goes on to suggest that there is uncertainty on this but that design changes would enable the effect to be reduced - this seems premature when the values and impacts have not yet been assessed. Our comments above on the reversibility of impacts from change to setting apply equally to these assets.	designated heritage assets is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	Historic England – PEIR response	As part of that further examination of the setting of designated heritage assets (7.9.5.3), as highlighted above, there should be a close connection with the LVIA in order to provide the evidence base for the conclusions that are drawn. We are pleased to hear that photomontage visualisations will be prepared, and we recommend that the precise locations of these are reviewed so that any visual impacts on the historic environment can be fully assessed. These photomontages should illustrate not only the solar panels themselves, but also any associated infrastructure proposed (e.g. fencing, lighting, CCTV towers and battery storage) so the full visual impact of the proposal can be	The detailed assessment of impacts and effects arising from changes within the settings of designated heritage assets is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES. The assessment included review of visualisations prepared for the LVIA and presented in Volume 2, Figures 8.12 - 8.127 of the ES **[EN010147/APP/6.4]**. Further visualisations are being prepared following consultation with Historic England and agreement of appropriate Viewpoints. These will

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		understood. Historic England would be happy to work alongside the local authority in identifying these key viewpoints.	be reviewed against the current detailed assessment of impacts and effects arising from changes within the settings of designated heritage assets which is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	Historic England – PEIR response	For non-designated heritage assets we welcome the approach taken thus far which has included extensive consultation with the Oxfordshire County Archaeology Team and desk-based assessment followed by geophysical survey. Discussions regarding the scope of evaluation work (trial trenching) are in progress. The research done so far has already found below-ground archaeological remains which may well be of equivalent (national) importance to designated sites, including a possible Roman temple. The approach taken to such remains, of avoiding direct impacts and assessing the impact of change to their setting, is welcome. However, predicting that the magnitude of impact will be negligible seems premature (7.9.3.10). We would appreciate involvement in future discussions regarding assets of potential national importance.	A total of 42 areas containing significant buried archaeological remains have been avoided and sufficiently buffered within the Project design as shown on the Illustrative Masterplan presented as Figures 2.1 – 2.3 within Volume 2, Figures of the ES **[EN010147/APP/6.4]**. The mitigation measures established for the avoidance and/or reduction of potential impacts on significant archaeological sites are set out within Section 7.8 of this ES chapter. The assessment of the consequent likely impacts and effects on buried archaeological remains is set out in Section 7.9 of this ES chapter.
February 2024	Historic England – PEIR response	We note that the results of the evaluation trenching will be incorporated into the Environmental Statement (ES) and this will be valuable, as is the intention to use these results in adjusting the design of the scheme to reduce or remove impacts.	The programme of trial trenching commenced in August 2024. The reports on the results of this work will be submitted to the Examining Authority at the earliest possible opportunity.
February 2024	Historic England – PEIR response	<u>Policy</u> There is a very full summary of national and local heritage policy and guidance in Section 1.3 of Appendix 7.1 (Desk-based Assessment). A summary of policy and guidance is in Chapter 7 of the PEIR - please note that during this consultation process the NPPF has been updated (December 2023) and the paragraph numbers referred to above have now changed. We recommend these are updated to reflect the latest version of the NPPF.	The detailed summary of national and local heritage policy and guidance is set out in Section 1.3 of Volume 3, Appendix 7.1: Historic Environment Desk-based Assessment of the ES **[EN010147/APP/6.5]**. It takes account of any changes to the NPPF since the production of the PEIR.

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February 2024	Historic England – PEIR response	We have also noted below for your reference a number of policy areas of relevance to development within the setting of a WHS, particularly for renewable energy. In the main we did not identify reference to these in either the HIA or PEIR. The relevant National Policy Statements, in addition to policies in relation to the impacts on designated heritage assets (including World Heritage Sites), include policies with similar intent to that at paragraph 2 of the NPPF: *"Planning policies and decisions must also reflect relevant international obligations and statutory requirements."* Amongst those international obligations are the UK Government's duties under the Convention Concerning the Protection of the World Cultural and Natural Heritage (1972) - the World Heritage Convention. NPS-EN1 (1.1.4): The Planning Act 2008 also requires that, where an NPS has effect, the Secretary of State must decide an application for energy infrastructure in accordance with the relevant NPSs except to the extent the Secretary of State is satisfied that to do so would lead to the UK being in breach of its international obligations. We noted that Chapter 7 of the PEIR makes no reference to Section 1.1.4 of NPS-EN1, nor paragraph 2 of the NPPF.	These policies are refenced in Section 1.3 of Volume 3, Appendix 7.1: Historic Environment Desk-based Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	Historic England – PEIR response	UNESCO's Policy Document on Climate Action for World Heritage <https://whc.unesco.org/en/climatechange/> (2023) was adopted by the General Assembly of States Parties at its 24th session in November 2023. It represents UNESCO's latest resource tool on responding to climate change. The policies within this document cover not only the impact of climate change on world heritage but also the effects of projects associated with climate action, such as renewable energy. They highlight the need for impact assessment with the aim of ensuring that the OUV of a World Heritage property is not negatively impacted. *"94. Implementation of climate actions related to World Heritage Climate Action Goal 3 (Mitigation) … at the national level could be*	This policy document is discussed within Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.

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		supported by…Developing frameworks that identify and promote the co-benefits of climate action and heritage safeguarding and which reduce real and perceived tensions between climate action and safeguarding Outstanding Universal Value, for example through impact assessment tools, environmental and social standards and taxonomies which take into account the cultural and social dimension of climate action projects; as well as through planning processes and methodologies for proactively avoiding and mediating conflicts. Such frameworks may be particularly relevant in addressing proposed renewable energy projects…" *"35. …Impact assessments must also be carried out as a pre-requisite for adaptation and mitigation responses within or around a World Heritage property to ensure that the Outstanding Universal Value is not negatively impacted."*	
February 2024	ICOMOS – PEIR response	According to the EIA Scoping Report, the project is planned for implementation starting 2025-2027 and for operation from 2027-2067, following which all above-ground infrastructure is planned to be removed. Chapter 7 of the EIA Scoping report is of interest, specifically sections 7.1 'Historic environment' and 7.2 'Landscape and Visual Resources'. It is notable that the Section 7.1 'Historic environment' reporting on the Legislative and Policy Context does not include the 1972 *World Heritage Convention* and the commitment of signatory States Parties to the Convention to: *ensure: …the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage referred to in Articles 1 and 2 and situated on its territory…* ' and that it will: '*do all it can to this end, to the utmost of its own resources and, where appropriate, with any international assistance and co-operation, in particular, financial, artistic, scientific and technical, which it may be able to obtain*.'	The 1972 World Heritage Convention is now referenced within Section 1.3 of Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	ICOMOS – PEIR response	Section 7.1 'Historic environment' also does not mention the *Operational Guidelines*, though it does refer to the *2022 Guidance and Toolkit for Impact Assessments in a World Heritage context*.	The OUV of the Blenheim Palace WHS is discussed within Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage

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		Its description of the Blenheim Palace World Heritage property in the Baseline Assessment refers only to the property – not to its Outstanding Universal Value nor to the potential importance of the setting of the property. The baseline assessment does however propose that a historic environment desk-based assessment baseline study be conducted to: '… *identify designated heritage assets whose significance may be affected through changes in their settings resulting from the construction, operation and decommissioning of the Project*'.	Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	ICOMOS – PEIR response	Section 7.1 'Historic environment' also proposed to limit the area to be assessed for visual impacts on Heritage assets to 2km from the boundaries of the development area and identifies potential effects on the settings of designated heritage assets during construction, operation and decommissioning of the project. It is notable that the Scoping Report includes an 'Approach to Mitigation, Enhancement and Monitoring,' which states that: '*Consideration will be given to any situation where the Project will lead to effects on the significance of heritage assets as a result of change within their settings. It may be possible that mitigation could be proposed that would eliminate or reduce any adverse effects*.	The detailed assessment of impacts and effects arising from changes within the settings of designated heritage assets is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. This includes consideration of heritage assets beyond the 2 km settings study area where appropriate.
February 2024	ICOMOS – PEIR response	The Historic Environment chapter of the PEIR continues on from the Scoping Report and indicates that the proximity of the Blenheim Palace World Heritage property was identified as a constraining factor to the development of the project throughout the identification and selection of areas for solar development. It also outlines the process towards the selection of areas for the solar farm development, effectively arguing that the process of land selection has shown that no other viable and available locations exist. In the section: Need, National Planning Policy, and Alternatives Considered it refers to the State Party's commitments to the Kyoto Protocol (1997), the United Nations Paris Agreement (COP21) and COP26, the UK Climate Change Act (2008, as amended) etc. It does not consider the State Party's	Volume 1, Chapter 5: Alternatives considered of the ES includes reference to the State Party's commitments under the 1972 UNESCO World Heritage Convention.

Date	Consultee and type of response	Issues Raised	How and where considered in the ES
		commitments under the 1972 UNESCO World Heritage Convention.	
February 2024	ICOMOS – PEIR response	The Blenheim Palace World Heritage property is of international significance, amongst others, as a historical designed landscape park, which is emblematic of the Arcadian landscape ideals associated with the English Romantic movement. The Arcadian Landscape presents an idealisation of a bucolic pastural landscape. As such, landscape parks like that at Blenheim should not be seen in isolation but rather as inextricably linked to the rural vestiges of its wider setting. This linage goes beyond the visual, and includes, as defined in the Operational Guidelines, *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*. Blenheim and the experience of Blenheim is linked to the Oxfordshire landscape. ICOMOS therefore does not agree that the 'Overall character of the historic Landscape' can be typified as 'Generally Low'. Such a typification, made in the PEIR, cannot be supported when the landscape is seen as the setting of the Outstanding Universal Value of the Blenheim Palace World Heritage property. Consequently, ICOMOS considers that the assessment of the impact of the proposed solar development, which will transform for a period of at least 40 years of roughly 1000 ha of land and see the installation of 107 km of 2,1 high fences on the wider setting of the OUV of the Blenheim Palace World Heritage property as 'Minor Adverse' to be inaccurate. ICOMOS considers that both the historical legibility of and the perception of the property may be dramatically altered by as significant a conversion of the predominantly rural wider setting of the property to effectively a semi-industrial landscape. ICOMOS also notes the concerning erosion of the landscape character of the immediate	The assessment of the likely impacts and effects on the overall historic landscape is set out in Section 7.9 of this ES chapter. The assessment of effects arising from the change within the setting of the Blenheim Palace WHS is discussed within Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.

Date	Consultee and type of response	Issues Raised	How and where considered in the ES
		and wider settings of the property, which indicate a possible ineffective management and aligned uncoordinated planning.	
February 2024	ICOMOS – PEIR response	The preventative steps undertaken by the project proponent to ensure that the project will not have any direct visual impact on the World Heritage property are appropriate and commendable. These actions however do not eliminate all potential impacts on the World Heritage property. ICOMOS considers that the possible impact of the project on the setting of the property has not been fully investigated. ICOMOS also assess that the PEIR seems not to have taken sufficient note of the State Party's international obligations under the 1972 World Heritage Convention in assessing the proposed development. ICOMOS therefore advises that the PEIR remains limited in its consideration of the Outstanding Universal Value of the property including the contribution of the wider setting of the property to its Outstanding Universal Value. This is an aspect that should be further explored.	The assessment of effects arising from the change within the setting of the Blenheim Palace WHS is discussed within Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	ICOMOS – PEIR response	ICOMOS also notes that Historic England has advised that the preliminary standalone HIA should be further developed. ICOMOS concurs with this assessment. ICOMOS advises that such a further development should focus on: • The revision and more thorough inventory of the attributes that contribute to the Outstanding Universal Value, as this is very underdeveloped in the November 2023 version of this document, • A further development of the relationship between property and its setting, including its wider setting, that explores the linkages between property and (wider) setting beyond only direct visual relationships, but also establishes how the wider setting supports the maintenance, legibility and experience of the property from the perspective of land use, spatial organization, social and cultural practices, perceptions and associations,	The assessment of effects arising from the change within the setting of the Blenheim Palace WHS is discussed within Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**. This has been developed through consultation with Historic England.

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		• The fact that the property has no defined buffer zone to provide an additional layer of protection to the property, • The setting and wider setting are under threat from diverse development proposals, meaning the cumulative impacts should be carefully considered	
February 2024	ICOMOS – PEIR response	To achieve the above, ICOMOS additionally advises that the proponent of the development commission a Landscape Character Assessment, specifically focussed on the relationship between the wider setting of the property and its Outstanding Universal Value as a baseline assessment from which a further assessment of the impact on the Outstanding Universal Value of the property can be further developed. Such a Landscape Character Assessment should: • Be undertaken as a foundational study to allow for the further development of the HIA, noted above, • Assess the efficacy of the management of the immediate and wider setting in maintaining the landscape character of the immediate and wider setting of the property, and • Clearly explore the importance of the wider setting, also in the understanding of the immediate setting and wider setting as what is passed through in the approach to the Park and Palace that cumulatively may have a large negative impact on the Outstanding Universal Value of the property.	The assessment of effects arising from the change within the setting of the Blenheim Palace WHS is discussed within Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**. This has been developed through consultation with Historic England.
February 2024	CPRE - PEIR response	This preliminary report fails to provide a good initial outline, even at a generic level, of the nature and scale of impacts and how they would be avoided, prevented or reduced and, if possible, offset, both in themselves and with regard to heritage and interactions with other factors, including the settings of heritage assets.	The updated assessment of likely impacts on heritage assets is presented in Sections 7.9 and 7.10 of this ES chapter, with additional information in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. A separate heritage impact assessment in respect of potential impacts on the Blenheim Palace WHS is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage

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			Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	CPRE - PEIR response	For example, the sections dealing with the 'Magnitude of Impact' make no reference at all to the total ground disturbance or its distribution within different components. The statement that 'It is anticipated that the footprint of activities associated with decommissioning will not exceed the footprint required for construction' is not credible unless all footings were to be left in the ground or could be extracted with no additional disturbance: neither is remotely likely.	The updated assessment of likely impacts on buried archaeological remains is presented in Section 7.9 of this ES chapter. It makes clear how impacts have been avoided through careful design. The footings required for the solar panels, the Main Project Substation and the Secondary Project Substations can be removed without any additional disturbance. This is set out in Table 3.1 in the Outline Decommissioning Plan **[EN010147/APP/7.6.4]**.
February 2024	CPRE - PEIR response	The full significance of archaeological sites that would be affected has yet to be established. Three scheduled monuments are adjacent to or surrounded by the development including cable runs which would be deep enough to disturb archaeology. The immediate surroundings (i.e. 'setting') would be physically disturbed, potentially destroying buried remains highly relevant to their significance, and prior archaeological investigation would clearly be warranted.	The updated assessment of likely impacts on buried archaeological remains is presented in Section 7.9 of this ES chapter. It makes clear how impacts have been avoided through careful design, including locations which comprises the settings of Scheduled Monuments.
February 2024	CPRE - PEIR response	Information on the effects on the Blenheim World Heritage Site (which includes a landmark monument visible from well outside the WHS and therefore has a wide setting) is not yet provided.	A separate heritage impact assessment in respect of potential impacts on the Blenheim Palace WHS is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	CPRE - PEIR response	There are four Conservation Areas (CAs) that are immediately adjacent to the proposed locations of solar panel arrays, and in two cases the development impinges on the CA. Conservation Areas seek to maintain the historic character of rural villages that have been set amongst fields throughout their existence. Where	The updated assessment of likely impacts on heritage assets is presented in Sections 7.9 and 7.10 of this ES chapter, with additional information in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**.

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		they have been extended by more recent suburban development the areas where CAs are still abutted by fields is where their setting is best preserved. This applies in several cases and the loss of the remaining open farmland to industrial development would be a major change to their setting and how their historic role relates to their surroundings.	These include assessment of impacts and effect on Conservation Areas. No development would occur within any Conservation Area.
February 2024	CPRE - PEIR response	In order to establish the full 'likely significant effects' in terms of setting issues and identify suitable mitigation measures to avoid, prevent or offset any harm it will be necessary to establish the future use of listed farmhouses and associated historic farm buildings and their future viability.	The updated assessment of likely impacts on heritage assets is presented in Sections 7.9 and 7.10 of this ES chapter, with additional information in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. It is not within the remit of the Applicant to determine the future use of listed farmhouses and associated historic farm buildings, or their future viability – this is a matter for the owners and occupiers of such buildings.
February 2024	CPRE - PEIR response	Contrary to the methodology proposed there is no discussion of historical importance of different Historic Landscape character types, only their relative rarity which is not the same.	This is addressed within Section 7.9 of this ES chapter and also within Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	CPRE - PEIR response	Cumulative Impacts The approach here is flawed in that the only reference to the scale of impact is the bizarre suggestion that the numerous other solar and housing developments considered as cumulative effects would not noticeably add to the impact of the proposal because it is so large. This claim is not supported by any figures for the total areas concerned, nor their locality both of which are key to the overall cumulative effect. The map of cumulative projects (which is very limited in spatial scope to the immediate surroundings of the proposed development) shows that a key effect of the cumulation of solar and other (mainly housing) developments would be to	The updated assessment of likely cumulative impacts on heritage assets is presented in Section 7.10 of this ES chapter. The short listed developments are shown on Figures 19.1, 19.2 and 19.3 (see Volume 2, Figures) **[EN010147/APP/6.4]**. The Applicant does not agree with the assertion that the Project would contribute towards the establishment of an 'urbanised' swathe of countryside – solar farms are not part of the urban environment.

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		create an urbanised swathe of countryside from Wootton in the north east almost to Cumnor in the south west. But this fails to consider further cumulative effects – for example the major developments proposed around Didcot, Harwell and Abingdon, including the proposed Abingdon Reservoir; or further east around Bicester, whose proximity all fall well within the overall length of this development.	
February 2024	Freeland Parish Council - PEIR response	This development would represent a massive change to the historic landscape of the area, which has been farmland at least since the middle ages. Again – it is the scale of change that is so concerning. Although the development is presented as temporary, 40 years represents two generations of children growing up within an industrialised landscape. At the end of that period, will the historic character be capable of restoration.	The updated assessment of likely impacts on heritage assets, including the historic landscape, is presented in Sections 7.9 and 7.10 of this ES chapter. Following decommissioning of the Project, the historic landscape character would be restored, albeit that elements of the mitigation planting would remain in place due to their ecological benefits.
February 2024	Freeland Parish Council - PEIR response	We are also seriously concerned about the effect on the landscape setting to Blenheim Palace, which has until now been the traditional estate farmlands of the palace. The proposed development could clearly result in Blenheim losing its WHS status following the precedent of Liverpool Docks.	A separate heritage impact assessment in respect of potential impacts on the Blenheim Palace WHS is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
January 2024	Evenlode Catchment Partnership - PEIR response	The main route from Oxford to Blenheim World Heritage Site, proposed panels are shown right up to the road which will have a significant impact on the gateway route, especially if visitors arrive in coaches with elevated views of the countryside.	This issue is addressed in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	Gardens Trust and Oxfordshire Gardens Trust – PEIR response	We are aware a full Heritage Impact Statement has not yet been produced. The PEIR includes an inventory of the designated heritage assets in the Site and wider 1 km and 2 km study area/search radius. These contribute to the character, sensitivity and value of the overall rural landscape on which the solar farm is proposed, that landscape also contributing to their own settings.	The updated assessment of likely impacts on heritage assets is presented in Sections 7.9 and 7.10 of this ES chapter, with additional information in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**.

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		The assets include RPGs, Listed Buildings, Scheduled Monuments and Conservation Areas. Apart from Blenheim there are two other RPGs within the 2 km wide study area around the Site: Yarnton Manor (Grade II) and Tackley Park and Water Garden (Grade II*).	
February 2024	Gardens Trust and Oxfordshire Gardens Trust – PEIR response	UK planning policy legislation can allow development to take place if 'public benefit' can be shown to outweigh harm. However, such a test does not apply to a WHS. The evaluation process of UNESCO/World Heritage Committee of the impacts on the OUV of a WHS does not allow for adverse impact to be balanced or mitigated by public benefit. In such a situation it is for the UK to make a final decision whether to issue a development consent order (DCO). This risks UNESCO choosing to place Blenheim on their List of World Heritage Sites in Danger and even deleting it from the World Heritage List as was the case for the Liverpool WHS in 2021.	A separate heritage impact assessment in respect of potential impacts on the Blenheim Palace WHS is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	Gardens Trust and Oxfordshire Gardens Trust – PEIR response	The GT/OGT are, however, concerned that the proposal does not respond to an overarching national spatial strategy to guide appropriate land use including for solar sites countrywide. The choice of energy sites is currently unplanned and opportunistic. Nor does it provide a national picture of the significance of heritage, ecology, and landscape against which the selection of the Botley West proposal can be seen to have been sequentially evaluated and then selected as an appropriate location. Where are the other potential sites and why have they been ruled out?	Site selection is discussed within Volume 1, Chapter 5: Alternatives Considered of the ES **[EN010147/APP/6.3]**.
February 2024	Gardens Trust and Oxfordshire Gardens Trust – PEIR response	The assessment of views (PEIR non-Technical Summary and LVIA) is incomplete and does not fully assess the effects in operation. Views are in one direction only but should be to and from viewpoints on PROW and of key heritage assets including Blenheim Palace, listed buildings, archaeology, and ancient woodland etc. There are only 18 photomontage visualizations so far and many of the most severe impacts are not illustrated. For example, viewpoints with high visual impact and no	The updated assessment of likely impacts on heritage assets is presented in Sections 7.9 and 7.10 of this ES chapter, with additional information in Volume 3, Appendix 7.5: Settings Assessment of the ES. The assessment included review of visualisations prepared for the LVIA and presented in Volume 2, Figures 8.12 - 8.127 of the ES. Further visualisations

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		photomontage include viewpoint 9 near Grade II* Hordley House and historic landscape; a reverse of this view looking towards the house is also needed to establish the impact on setting. The value of Historic Routes is also an omission that has yet to be assessed: Akeman Street, Dornford drove road, Eynsham toll road, and long-distance routes such as Oxford Greenbelt Way and the Oxfordshire Way. Another omission is the lack of assessment of non-registered sites contained in the draft Gazetteer of Parks and Gardens in Oxfordshire compiled by OGT. Lower Dornford, a landscape designed by Capability Brown which is on the OGT Gazetteer, has not been assessed in the PEIR. The PEIR also fails to assess the impacts of the proposed solar farm on the significance of heritage assets and their settings as required in NPPF 2023, paragraph 194. Despite the available guidance, it is our opinion the PEIR fails to adequately define, assess, and give appropriate weight to the value of setting and its contribution to the significance of designated assets, in particular the WHS and RPG as advised by policy and other national guidance. The PEIR acknowledges that as part of a compliant HIA, a full analysis including the 'Impact on the Blenheim Palace WHS as a result of change within its setting' is still work in progress and recognizes the importance of the HIA process being iterative. It is also stated that there are 'uncertainties' about some of the impact conclusions (particularly those concerning the WHS) but that these impacts can be dealt with by further mitigation if they arise. This is disingenuous and underlines the need for a fuller evaluation before further decisions in the NSIP process are taken. We consider the conclusions of the Preliminary Heritage Assessment in relation to the WHS and its setting are oversimplified and flawed when the heritage assessment method relies primarily on visual criteria and ignores the sensitivity and value of the wider landscape setting and the contribution this makes to the OUV of the WHS and other designated assets. Potential impacts on the OUV and setting of the WHS should not	are being prepared following consultation with Historic England and agreement of appropriate Viewpoints. These will be reviewed against the current detailed assessment of impacts and effects arising from changes within the settings of designated heritage assets which is presented in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. A separate heritage impact assessment in respect of potential impacts on the Blenheim Palace WHS is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.

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		be screened out at this stage and should be reconsidered in a comprehensive HIA prepared using UNESCO guidance. The large scale and wide spread of the solar farm and its intervisibility with the wider landscapes would severely impact on the character of a sequence of local and distinctive landscape character areas. These are interconnected with subtle transitions and form a coherent whole of high value and sensitivity. This quality is in large part a result of the presence of features and patterns in the landscape that create a time depth and historical dimension.	
February 2024	Gardens Trust and Oxfordshire Gardens Trust – PEIR response	The Blenheim Palace WHS was placed on the World Heritage List in 1987. Like some other WHSs of this period the inscription for Blenheim did not include a formal buffer zone. In the case of Blenheim, the OUV of the WHS was focused on the Palace with the Park being perceived as the setting for this. Today, the concept of setting is fully appreciated with many WHSs now also having a recognized 'buffer zone' which is a material consideration in decision taking. This has brought WHS more into line with national guidance which emphasises the importance of defining and protecting the setting of heritage assets. In response, UK WHSs including Blenheim, have retrogressively refined their Statements of OUV and related attributes (significance) and had these adopted by UNESCO. The most recent WHS Management Plan (2017) adopted by Blenheim and UNESCO incorporates these refinements and incorporates, as Appendix III, a Setting Study. This important document follows best practice and guidance. It uses both views and intervisibility as well as landscape character and quality as a basis for describing in detail the definition of, and value of the Blenheim WHS setting and its components. Crucially, the study acknowledges that the wider landscape setting beyond the Park contributes to the OUV of the WHS and considers in Para 5.02 that the elements that most directly related to this are: • *'The connection with the River Glyme -the management of this river as it runs through the setting of the WHS directly*	A separate heritage impact assessment in respect of potential impacts on the Blenheim Palace WHS is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.

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		affects the character, ecological value and water quality of Lancelot Brown's lake within the WHS; • *The links with the much larger and ancient Wychwood Forest area;* • *The value of the boundary wall and plantations which mainly hide the park from outside views, but also form important woodland elements in the wider landscape;* • *The key visual linkages between Blenheim and its setting - to Bladon church in the south and from Old Woodstock to the Column of Victory in the east;* • *The character of the setting as traditional English countryside, dotted with picturesque villages mainly built using a uniform palate of materials.'* The last of the points above essentially acknowledges that the rural agricultural character of the wider landscape, including the extensive areas proposed for the solar farm, have a value that as a setting is both in contrast to and complimentary to the historic designed parkland of Blenheim Park. Para 5.03 goes on to say that: '*These significances are important individually and together in achieving a strong sense of place, which helps foster a sense of community through pride in the WHS and connecting with the local area. Landscape character, views and the historic environment, together with recreational opportunities and biodiversity are all important parts of feeling connected and belonging with local community*.'	
February 2024	Gardens Trust and Oxfordshire Gardens Trust – PEIR response	We therefore feel the sensitivity of the landscape of the Site is undervalued by the PEIR analysis (Ch 8 Table 8.9). The rating fails to reflect the high value of the landscape as a setting for designated heritage assets including the WHS and the presence of numerous undesignated heritage sites, landscape features and patterns that create a time depth and historic dimension in the landscape. It also fails to take proper account of the current and cumulative development pressures and threats that are changing	A separate heritage impact assessment in respect of potential impacts on the Blenheim Palace WHS is presented in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.

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		the character of the emerging 'in between' landscapes and creating an even greater sense of sensitivity for these areas as perceived by local communities and stakeholders. For example, Salt Cross Garden Village, with its 2,200 new homes and a new science business park, is due to be built immediately to the north of Eynsham. It shares a north-eastern boundary with Botley West solar farm and currently appears as open countryside on the accompanying maps, giving a false impression of unchanged landscape area. The PEIR acknowledges that the wider landscape including the Site has a role as setting for the WHS as described above and that there will be '*potential impacts and residual effects*' on 'the Blenheim WHS as a result of change within its setting' (Table 7.17 Para 7.14 .1.2 of Vol 1 Ch 7 (Historic Environment). However, these critically important impacts on setting have not yet been defined and evaluated but will be examined in a separate HIA which '*is being undertaken to review the potential for the Project to harm the significance of the WHS as a result of change within its setting'*. If the concept of a valuable and sensitive setting for the WHS is accepted and the large scale and wide extent of the project is imposed on this, there seems little doubt that a severe and adverse impact on the character and functions of the WHS setting would result.	
February 2024	Bladon Parish Council – PEIR response	The PEIR does not appear to take into account the Conservation Area Character Appraisal for Bladon's Conservation Area, which identifies important views out of the village towards the south. BPC asks that the Conservation Character Appraisal is taken into account when assessing the impact of the development on the area.	This issue is addressed in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	Bladon Parish Council – PEIR response	The PEIR does not acknowledge that St Martin's Church in Bladon is of historical significance. St Martin's is the resting place of Sir Winston Churchill and is visited by a large number of tourists annually and plays host to several memorial events every	This issue is addressed in Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**.

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		year. BPC asks that the impact of the proposal on St Martin's and its visitors is assessed as part of the application.	
February 2024	Bladon Parish Council – PEIR response	BPC is also concerned that proposal will have detrimental impact on Blenheim World Heritage Site and other historic and heritage sites in the area due to the visibility of the proposal by all visitors approaching the area along the A44.	This issue is addressed in Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	Oxfordshire Architectural and Historical Society - PEIR response	We note that you have consulted various sources including the Archaeology Data Services' Archsearch and County Historic Environment Record systems. There is a good possibility that these sources do not contain all the information concerning known remains. The Archsearch system is due to be replaced in September 2024 and it not known when the HER will contain the range of information envisaged in section 230 of the Levelling-up and Regeneration Act 2023.	The acquisition of baseline data is described within Volume 3, Appendix 7.1: Historic Environment Desk-based Assessment of the ES. This has included data sources beyond the HERs and Archsearch, such as the PAS, historic maps, aerial photographic review, LiDAR imagery and geophysical survey. Section 230 of the Levelling-up and Regeneration Act 2023 has not yet been enacted, and no timetable for its enactment has been put forward by the Government.
February 2024	Oxfordshire Architectural and Historical Society - PEIR response	We note that a magnetometry survey has been carried out over much of the area. Other schemes, such as the West Oxford flood relief channel, have used other methods in addition to magnetometry. Magnetometry on this type of soil is likely to locate ditches, but less likely to locate limestone walls or burials and won't locate flint scatters. We understand that some 1350 hectares of magnetometry is proposed and have been able to examine the draft report by Atlas Geophysics on 470 hectares. A smaller survey of the Red House farm area was received by Botley library on 24 January, but has not been considered here. Our observations on the Atlas survey interim report are: a) It has been carried out using equipment where several sensors are towed behind a vehicle. This is efficient but can leave a ripple in the data and small gaps between tracks which have not been	The methodology for the geophysical survey was discussed in advance with the Archaeology Team Leader at Oxfordshire County Council. A Written Scheme of Investigation (WSI) was submitted to, and agreed with, the Archaeology Team Leader at Oxfordshire County Council prior to commencement of the survey. The methodology for the survey, and for reporting, is in accordance with the relevant guidance prepared by the Archaeology Team at Oxfordshire County Council. It is agreed that the geophysical survey has resulted in the identification of buried archaeological remains that were previously unknown. The results of the survey are presented within Volume 3, Appendix 7.3:

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		surveyed. The reading density is not clearly stated, but is assumed to be 4 per square metre. b) The printed versions are on A4 paper with the survey plots saying they are 1:5000 at A3, (although linear scales are also shown). This is too small to be of much use and a long way from the 1:1000 suggested in the EAC Guidelines. c) Many anomalies are identified as being 'ferrous points'. Whilst many might be horseshoes and similar, some of the larger ones may be tree throw holes, corn driers or hearths. Trace plots, as suggested in the EAC Guidance could help distinguish these. d) There is a tendency to attribute some responses as being of natural origin when 'unknown' may be more appropriate and may indicate the need for further investigation. e) This survey has located, probably Bronze Age, round ditches, a possible Romano-British farmstead and other remains which would have otherwise have been unknown.	Geophysical Survey Report of the PEIR **[EN010147/APP/6.5]**.
February 2024	Oxfordshire Architectural and Historical Society - PEIR response	There appears to be a conflict between the applicants who allocate a 'low to negligible sensitivity to Heritage assets with importance to local interest groups or that contribute to local research objectives'. This varies from the views of the County Archaeology section, although the applicants claim to have taken account of those views. If only National Scheduled monuments and similar are to be considered relevant, (as this is apparently a nationally important infrastructure project), avoiding consideration of non-nationally important remains may account for the applicants swerving the usual Local Authority planning route.	The assessment of impacts and effects on buried archaeological remains is presented in Section 7.9 of this ES chapter. It addresses archaeological remains of all levels of importance. The requirement to seek a Development Consent Order is a consequence of the Project being classed as a Nationally Significant Infrastructure Project (NSIP) under the criteria established in the Planning Act 2008 (refer to Volume 1, Chapter 1: Introduction of the ES).
February 2024	Oxfordshire Architectural and Historical Society - PEIR response	There are 16 farmsteads close to the proposed arrays of panels. The list of the affected farmsteads, given in Appendix 1, includes 8 sites containing a total of 18 listed buildings. (n/l = not listed). For all the listed buildings, an assessment should be made of the effect of the proposed development on its setting – in ‘normal’	The updated assessment of likely impacts on heritage assets is presented in Sections 7.9 and 7.10 of this ES chapter. This includes effects arising from changes within the settings of listed buildings (including farmhouses). Additional

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		planning applications, consent would be refused if the development had a major deleterious affect of its setting (sic) – unless of course the 'public benefit' outweighed the harm.	information is presented within Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	Oxfordshire Architectural and Historical Society - PEIR response	Experience of recording farm buildings has shown that even if a structure is not listed, it has potential for shedding light on datable constructional features (materials, roof structures, fittings etc) and hence past (and current) agricultural practices. It should, therefore, not be assumed that an unlisted building is of no significance in terms of the definitions used by Historic England. Regardless of their listed status, therefore, all the affected buildings should be fully recorded before the plans for the development are decided upon.	No buildings (historic or otherwise) would be physically impacted by the construction, operation and maintenance, or decommissioning of the Project. No historic building recording is therefore proposed.
February 2024	Oxfordshire Architectural and Historical Society - PEIR response	The effects on the historic environment have been assessed by the RPS Group (a Tetra Tech company) and are set out in Chapter 7 of the project PEIR (Preliminary Environmental Information Report) It is clear from that document that: 1. It seems that none of the relevant conservation officers has been consulted 2. the report does not consider Grade II listed or unlisted buildings to be of significance 3. those that compiled the report have not studied local neighbourhood plans or conservation area appraisals to identify non-designated heritage assets (and indeed have considered these of such minor importance that the effects of the scheme on them can be ignored).	The Project is located in land that falls within the administrative areas of three local planning authorities. Consultation with these local planning authorities has been ongoing throughout the preparation of the DCO application. The Conservation Officers at these local planning authorities have therefore been able to offer advice and comment as necessary. The methodology used for the assessment of impacts and effects on the historic environment is set out in Section 7.4 of this ES chapter. Grade II listed buildings are generally allocated a Medium level of value/sensitivity, whilst non-listed or locally listed buildings are generally allocated a Low level of value/sensitivity. This is in line with similar methodologies established by UK Government agencies (e.g. National Highways). No adverse comments on the methodology and its application have been received from Historic England or Oxfordshire County Council.

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			All relevant Conservation Area Appraisals and Neighbourhood Plans have been reviewed as part of the assessment. These are identified within Volume 3, Appendix 7.1: Historic Environment Desk-based Assessment of the ES and further discussed where appropriate within Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	Oxfordshire Architectural and Historical Society - PEIR response	The report states that no designated heritage assets will be directly impacted by the development. This is somewhat disingenuous. All the sites listed in Appendix 1 have farmhouses, which are probably in domestic use. The report is silent as to who owns these buildings – but while we understand two are freehold, the Blenheim Estate owns the remainder, and we believe that they are currently tenanted, perhaps by those who also lease agricultural land and farm it as an occupation. These people will presumably lose their livelihoods as a result of the development and may be compelled to leave the properties. But who is going to live in the farmhouses surrounded by solar panels? It seems likely that neither farming families (who will not have anything to farm) nor people wishing to exchange town life for the countryside will be interested in living in these places. To the extent that there are historic buildings, these could be at serious risk of neglect and deterioration.	It is not within the remit of the Applicant to determine the future use of listed farmhouses and associated historic farm buildings, or their future viability – this is a matter for the owners and occupiers of such buildings.
February 2024	Oxfordshire Architectural and Historical Society - PEIR response	Overall, the general view taken by the PEIR is that there are few adverse consequences for the historic built environment. This is based on a very narrow legalistic definition of what constitutes significance and ignores context and unintended consequences. They also state that there are 'uncertainties' about the impacts and think that these can be dealt with by further efforts of mitigation if they arise. This is disingenuous and it is necessary for as full as possible an assessment be made BEFORE decisions are taken. We should ask for an assessment showing	The updated assessment of likely impacts on heritage assets is presented in Sections 7.9 and 7.10 of this ES chapter. No information is presented with regard to the potential future use of agricultural buildings adjacent to the Site– this is a matter for the owners and occupiers of such buildings.

Date	Consultee and type of response	Issues Raised	How and where considered in the ES
		which buildings will be needed to support the limited agricultural use on the site (lambing barns etc.) and which will be redundant.	
February 2024	Oxfordshire Architectural and Historical Society - PEIR response	The 'setting' of the WHS, listed buildings and conservation areas is usually defined in terms of visual impact measured at ground level, or, as with the Oxford view cones, from specific points in the landscape. There is scope here for arguing that the impact has been minimised only through ground-level mitigation measures such as hedge-planting, while the viewpoints and aerial aspects of setting have been ignored. This is a lot narrower than the factors potentially contributing that the historic England guidance which covers: • *physical* surroundings (e.g. topography, vegetation/landuse, other historic features, historic character of the vicinity) that may be changed • *perceptual* characteristics (e.g. visual interrelationships and noise context) and • *associative* factors (e.g. historical, artistic, traditional). It might also be taken to suggest that settings cannot be affected unless there is a direct visible link – whereas it is about how historic attributes and relationships to physical surroundings are 'experienced' which can involve the experience of moving through the landscape.	The detailed assessment of impacts and effects arising from changes within the settings of designated heritage assets is presented within Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. Where relevant, these non-visual elements of setting have been considered, although it is noted that the Historic England guidance as set out in their Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2nd edition, December 2017) states that '*The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across or including that asset*.' (paragraph 10). The assessment of impacts and effects on the Blenheim Palace WHS is presented within Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**. This includes consideration of many of the perceptual and associative factors linked with the Outstanding Universal Value of the WHS.
February 2024	Oxfordshire Architectural and Historical Society - PEIR response	There are four Conservation Areas immediately adjacent to the proposed locations of solar panel arrays, two of which are impinged by the development. These and other CAs are rural villages, historically reliant on farming containing several listed buildings, including in some cases churches with towers or spires intended to be seen from the surrounding landscape.	The detailed assessment of impacts and effects arising from changes within the settings of designated heritage assets is presented within Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. This includes

Date	Consultee and type of response	Issues Raised	How and where considered in the ES
			the assessment of impacts and effects on Conservation Areas. No development is proposed within any Conservation Area.
February 2024	Stop Botley West – PEIR response	The proposed project would have a dramatic impact on the setting of the UNESCO World Heritage Site of Blenheim Palace. A Heritage Impact Assessment for the WHS at Blenheim Palace is required by Historic England and UNESCO but none has so far been done.	The assessment of impacts and effects on the Blenheim Palace WHS is presented within Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**.
February 2024	Stop Botley West – PEIR response	The proposed project would have a detrimental impact on numerous other important heritage assets such as the Historic England Protected Monument site of Sansom's Platt, the burial place of Sir Winston Churchill in Bladon, and many historic and listed buildings in the 15 villages and towns bordering the proposed sites. Immediately adjacent to the proposed sites there are also four Conservation Areas which are intended to maintain the historic character and setting of these rural communities.	The detailed assessment of impacts and effects arising from changes within the settings of designated heritage assets is presented within Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. This includes the assessment of impacts and effects on Scheduled Monuments and Conservation Areas.
February 2024	Stop Botley West – PEIR response	Historic sites of national and international importance and their settings should be removed from the proposed Site.	A total of 42 areas containing significant buried archaeological remains have been avoided and sufficiently buffered within the Project design as shown on the Illustrative Masterplan presented as Figures 2.1 – 2.3 within Volume 2, Figures of the ES **[EN010147/APP/6.5]**.

7.4 Assessment Methodology

Relevant Guidance

7.4.1 The following guidance documents have been considered in the compilation of the historic environment baseline and the subsequent assessment of impacts and effects.

- Conservation Principles, Policies and Guidance for the sustainable management of the historic environment (English Heritage, 2008).
- Standard and guidance for historic environment desk-based assessment (Chartered Institute for Archaeologists (CIfA), 2020a).
- Standard and guidance for archaeological geophysical survey (CIfA, 2020b).
- Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015).
- The Setting of Heritage Assets (Historic England, 2017).
- Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England, 2019).
- Principles of Cultural Heritage Impact Assessment in the UK (Institute of Environmental Management and Assessment (IEMA), Institute of Historic Building Conservation and CIfA, 2021).

7.4.2 Detailed information regarding relevant guidance is presented within Section 1.3 of Volume 3, Appendix 7.1: Historic Environment Desk-Based Assessment of the ES **[EN010147/APP/6.5]**.

Scope of the Assessment

7.4.3 The scope of this ES has been developed in consultation with relevant statutory and non-statutory consultees as detailed in **Table 7.4** and **Table 7.5**.

7.4.4 The historic environment baseline has been established through a review of available information acquired from appropriate sources including the National Heritage List for England (NHLE) and the Oxfordshire HER, and through a number of site visits. The study areas for the acquisition of baseline information extends beyond the land required for the construction, operation and maintenance and decommissioning of the Project. These study areas have been agreed with stakeholders via the Scoping Report and the Scoping Opinion as well as through subsequent consultation (see **Table 7.4**).

7.4.5 The acquisition of available baseline information has been supplemented by a programme of geophysical survey as set out below. The scope and extent of this survey has been developed with, and approved by, the appropriate stakeholders.

7.4.6 Taking into account the scoping and consultation process, **Table 7.6** summarises the effects considered as part of this assessment.

Table 7.6: Effects considered within this assessment

Activity	Potential effects scoped into the assessment
Construction Phase	
Construction of the Project including haul roads and temporary construction compounds	Effects arising from damage to or permanent loss of buried archaeological and geoarchaeological resources.
	Effects arising from changes within the settings of designated heritage assets.
	Effects arising from changes to the character of the historic landscape.
Operation and Maintenance Phase	
Operation and maintenance of the Project	Effects arising from changes within the settings of designated heritage assets.
	Effects arising from changes to the character of the historic landscape.
Decommissioning Phase	
Decommissioning of the Project	Effects arising from damage to or permanent loss of buried archaeological and geoarchaeological resources.
	Effects arising from changes within the settings of designated heritage assets.
	Effects arising from changes to the character of the historic landscape.

7.4.7 Effects which are not considered likely to be significant have been scoped out of the assessment. A summary of the effects scoped out is presented in **Table 7.7**.

Table 7.7: Effects scoped out of the assessment

Effect	Justification
Effects arising from impacts on buried archaeological resources during operation and maintenance.	Activities associated with the operation and maintenance of the Project are unlikely to damage or result in the permanent loss of buried archaeological resources.

Study area

7.4.8 The historic environment study area is made up as follows.

- For all types of designated heritage assets – a buffer zone extending for 2 km from the edge of the Order Limits for the Project. This is also referred to as the settings study area. Designated heritage assets beyond the 2 km buffer zone have been included within the assessment where they fall within the Zone of Theoretical Visibility (ZTV) established for the Project and where they have designed views towards the Project or where it is considered that have a particular iconic status that may be affected by the Project: and
- For all types of non-designated heritage assets – a buffer zone extending for 1 km from the boundaries of the Northern, Central and Southern Sites, also a buffer extending for 500 m from the edge of the Order Limits

for the 275kV cable corridor where this falls outside the 1 km buffer zone for the Northern, Central and Southern Site Areas.

7.4.9 The extents of these study areas are indicated on Figure 7.1 (see Volume 2, Figures) **[EN010147/APP/6.4]**.

Methodology for Baseline Studies

Desk studies

7.4.10 A comprehensive desk-based review was undertaken to inform the baseline for historic environment. Key sources of data include the Oxfordshire HER and the NHLE maintained by Historic England. A detailed account of the results of this review is presented within Volume 3, Appendix 5.1: Historic Environment Desk-Based Assessment of this ES **[EN010147/APP/6.5]**.

7.4.11 A detailed review of available historical aerial photographs and also all available data output from Light Detecting and Ranging (LiDAR) surveys has been undertaken. The results of this review are presented within Volume 3, Appendix 5.2: Assessment of Airborne Remote Sensing and Satellite Imagery for Archaeology of this ES **[EN010147/APP/6.5]**.

Site-specific surveys

7.4.12 An archaeological geophysical survey (fluxgate magnetometry) has been undertaken across all land within the Site that is suitable for this type of survey. The methodology for the survey was set out in a detailed Written scheme of Investigation that was approved in advance by the archaeological advisor to the local authorities. The results of the survey are presented in Volume 3, Appendix 7.3: Geophysical Survey Report of the ES.

7.4.13 A programme of archaeological trial trenching has been agreed via a Written scheme of Investigation approved by the archaeological advisor to the local authorities. This programme commenced in August 2024 and a report on the results of the work will be submitted into the examination of the DCO application for the Project as soon as it is available.

7.5 Assessment Criteria and Assignment of Significance

Overview

7.5.1 The significance of an effect is determined based on the sensitivity or value of a receptor and the magnitude of an impact. This section describes the criteria applied in this chapter to characterise the sensitivity/value of receptors and magnitude of potential impacts. The terms used to define magnitude and sensitivity are based on and have been adapted from those used in the Design Manual for Roads and Bridges (DMRB) methodology (Highways England *et al.,* 2020).

7.5.2 The approach to determining the significance of effects is a two-stage process that involves defining the magnitude of the impact and the sensitivity of the receptor. This section describes the criteria applied in this chapter to assign values to the magnitude of potential impacts and the sensitivity of the

receptors. The terms used to define magnitude and sensitivity are based on those which are described in further detail in Volume 1, Chapter 4: Approach to Environmental Assessment of the ES **[EN010147/APP/6.3]**.

Receptor Value and Sensitivity

7.5.3 The criteria for defining sensitivity/value in this chapter are outlined in **Table 7.8** below.

Table 7.8: Sensitivity/value criteria

Sensitivity/Value	Definition
Very High	Historic assets of international importance. World Heritage Sites and the individual attributes that convey their Outstanding Universal Value. Areas associated with intangible heritage and areas with associations with particular innovations, scientific developments, movements or individuals of global importance. Assets that can contribute significantly to acknowledged international research objectives.
High	Scheduled Monuments, Listed Buildings (Grade I, II*), Registered Historic Parks and Gardens (Grade I, II*), Registered Battlefields, Protected Wrecks, Protected Military Remains. Other listed buildings that can be shown to have exceptional qualities in their fabric or historical association not adequately reflected in the listing grade. Unscheduled sites and monuments of schedulable quality and/or importance including those discovered through the course of evaluation or mitigation. Archaeological assets that can contribute significantly to acknowledged national research objectives. Conservation Areas containing very important buildings (Grade I and II* Listed Buildings). Non-designated structures of clear national importance. Palaeogeographic features with a demonstrable high potential to include artefactual and/or palaeoenvironmental material, possibly as part of a prehistoric site or landscape. Non-designated sites of wrecked ships and aircraft that are demonstrably of equivalent archaeological importance to those already designated.
Medium	Conservation Areas, Grade II Listed Buildings and Grade II Registered Historic Parks and Gardens. Non-designated archaeological assets that can contribute to regional research objectives. Historic townscapes and landscapes with reasonable coherence, time depth and other critical factor(s). Unlisted assets that can be shown to have exceptional qualities or historic association. Non-designated historic landscapes that would justify special historic landscape designation, landscapes of regional value. Averagely well-preserved historic landscapes with reasonable coherence, time-depth or other critical factors. Prehistoric deposits with moderate potential to contribute to an understanding of the palaeoenvironment.

Sensitivity/Value	Definition
	Undesignated wrecks of ships or aircraft that have moderate potential based on a formal assessment of their importance in terms of build, use, loss, survival and investigation.
Low	Heritage assets with importance to local interest groups or that contribute to local research objectives. Locally Listed Buildings and Sites of Importance within a district level. Non-designated assets compromised by poor preservation and/or poor contextual associations. Non-designated historic landscapes. Historic landscapes with importance to local interest groups. Historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations. Prehistoric deposits with low potential to contribute to an understanding of the palaeoenvironment. Undesignated wrecks of ships or aircraft that have low potential based on a formal assessment of their importance in terms of build, use, loss, survival and investigation.
Negligible	Assets with little or no archaeological or historical interest due to poor preservation or survival. Buildings of little or no architectural or historic note; buildings of an intrusive character. Landscapes with little or no significant historical interest.

Magnitude of impact

7.5.4 The criteria for defining magnitude in this chapter are outlined in **Table 7.9** below.

Table 7.9: Impact magnitude criteria

Magnitude of impact		Definition
High	Adverse	Change to most or all key elements of the heritage asset, or changes within the setting of the asset, such that the heritage significance of the asset is lost or substantially harmed.
	Beneficial	Change to most or all key elements of the heritage asset, or changes within the setting of the asset, such that the heritage significance of the asset is substantially enhanced.
Medium	Adverse	Change to elements of the heritage asset, or changes within the setting of the asset, such that the heritage significance of the asset is clearly harmed.
	Beneficial	Change to elements of the heritage asset, or changes within the setting of the asset, such that the heritage significance of the asset is clearly enhanced.
Low	Adverse	Change to elements of the heritage asset, or changes within the setting of the asset, such that the heritage significance of the asset is slightly harmed.

Magnitude of impact		Definition
	Beneficial	Change to elements of the heritage asset, or changes within the setting of the asset, such that the heritage significance of the asset is slightly enhanced.
Negligible	Adverse	Change to elements of the heritage asset, or changes within the setting of the asset, such that the heritage significance of the asset is barely affected.
	Beneficial	Change to elements of the heritage asset, or changes within the setting of the asset, such that the heritage significance of the asset is barely affected.
No change		No discernible changes to elements of the heritage asset, or within the setting of the asset.

Significance of effect

7.5.5 The significance of the effect upon a heritage asset has been determined by taking into account the sensitivity/value of the receptor and the magnitude of the impact. The method employed for this assessment is presented in **Table 7.10**. Where a range of significance levels is presented, the final assessment for each effect is based upon expert judgement.

7.5.6 In all cases, the evaluation of receptor sensitivity, impact magnitude and significance of effect has been informed by professional judgement and is underpinned by narrative to explain the conclusions reached.

7.5.7 For the purpose of this assessment, any effects with a significance level of minor or less are not considered to be significant in terms of the EIA Regulations.

Table 7.10: Assessment matrix

Sensitivity/value of Receptor	Magnitude of Impact				
	No Change	Negligible	Low	Medium	High
Negligible	No change	Negligible	Negligible or Minor	Negligible or Minor	Minor
Low	No change	Negligible or Minor	Negligible or Minor	Minor	Minor or Moderate
Medium	No change	Negligible or Minor	Minor	Moderate	Moderate or Major
High	No change	Minor	Minor or Moderate	Moderate or Major	Major
Very High	No change	Minor	Moderate or Major	Major	Substantial

7.5.8 Where the magnitude of impact is ‘no change’, no effect would arise.

7.5.9 The definitions for significance of effect levels are described as follows.

- Substantial: Only adverse effects are normally assigned this level of significance. These effects are generally, but not exclusively, associated

with sites or features of international importance that are likely to suffer a most damaging impact and loss of resource integrity. However, a major change in a site or feature of national importance may also enter this category.

- Major: These beneficial or adverse effects are considered to be very important considerations and are likely to be material in the decision-making process. These effects are generally, but not exclusively, associated with sites or features of international, national or regional importance that are likely to suffer a most damaging impact and loss of resource integrity. However, a major change in a site or feature of local importance may also enter this category. Effects upon human receptors may also be attributed this level of significance.
- Moderate: These beneficial or adverse effects have the potential to be important and may influence the key decision-making process. The cumulative effects of such factors may influence decision-making if they lead to an increase in the overall adverse or beneficial effect on a particular resource or receptor.
- Minor: These beneficial or adverse effects are generally, but not exclusively, raised as local factors. They are unlikely to be critical in the decision-making process but are important in enhancing the subsequent design of the project.
- Negligible: No effects or those that are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error.
- No change: No loss or alteration of characteristics, features or elements; no observable impact in either direction.

Assumptions and limitations of the assessment

7.5.10 All readily available data required for the assessment have been acquired, collated and critically examined.

7.5.11 One limitation is with regard to the presence, absence, extent, nature and significance of buried archaeological remains within the Site. A number of non-intrusive methodologies have been utilised in order to gain as much information as possible, including geophysical survey, but no site-specific intrusive surveys have yet been reported on. However, this limitation has been addressed through the measures incorporated into the design of the Project as set out in Section 7.8 of this chapter.

7.6 Baseline Environment Conditions

Desk study

7.6.1 Information on the historic environment baseline within the study areas was collected through a detailed review of existing studies and datasets. The following sources were reviewed.

- The regional Historic Environment Record (HER) maintained by Oxfordshire County Council.
- Historic England's National Heritage List for England (NHLE) for information on World Heritage Sites, Scheduled Monuments, Listed Buildings, and Registered Parks and Gardens and Landscapes of Special Historic Interest.
- Documents held by the Oxfordshire History Centre (Oxford).
- 19th century tithe maps, historic county maps and early Ordnance Survey (OS) maps.
- British Geological Survey (BGS) data.
- Data held by the Archaeology Data Service (ADS).
- Portable Antiquities Scheme (PAS).
- British History Online.
- The 1086 Domesday Survey.

7.6.2 The separate study of historic aerial photographs and LiDAR data (Volume 3, Appendix 7.2: Assessment of Airborne Remote Sensing and Satellite Imagery for Archaeology of the ES **[EN010147/APP/6.5]**) included review of additional appropriate sources.

7.6.3 A detailed appraisal of the historic environment baseline is set out in Volume 3, Appendix 7.1: Historic Environment Desk-Based Assessment of the ES **[EN010147/APP/6.5]**, with a summary provided here. **Table 7.11** presents the defined timescales used within this summary.

Table 7.11: Defined timescales

Term	Timescale
Prehistoric	
Palaeolithic	900,000 – 12,000 BC
Mesolithic	12,000 – 4,000 BC
Neolithic	4,000 – 1,800 BC
Bronze Age	1,800 – 600 BC
Iron Age	600 BC – AD 43
Historic	
Roman	AD 43 - 410
Early Medieval	AD 411 - 1066
Medieval	AD 1067 - 1485
Post-medieval	AD 1486 - 1799
Modern	AD 1800 - present

Designated heritage assets

7.6.4 No designated heritage assets would be directly physically impacted by the construction, operation and maintenance, or decommissioning of the Project. Any impacts on designated heritage assets would arise from a change within the setting of the asset. Elements of two Conservation Areas extend into the Order Limits for the Project (at Bladon and Church Hanborough within the Central Site Area). However, no development is proposed within any part of either of these two Conservation Areas, nor any other Conservation Area

7.6.5 The locations of all designated heritage assets within the defined 2 km settings study area are indicated on Figure 7.1 (see Volume 3, Figures **[EN010147/APP/6.4]**). A Project-specific Site Number prefixed BW (Botley West) is used to identify each designated heritage asset on Figure 7.1; additional information on each asset is set out in Volume 3, Appendix 7.1: Historic Environment Desk-Based Assessment of the ES and in Annex A of that document**[EN010147/APP/6.5]**.

7.6.6 The Blenheim Palace WHS is located to the north-west of the Central Site Area and to the south-west of the Northern Site Area (**BW0021**). It was inscribed as a WHS in 1987. Blenheim Palace was built between 1705 and 1722 as the home of the Dukes of Marlborough. It is named after the Battle of Blenheim (1704) and was intended to be a reward to John Churchill (1st Duke of Marlborough) for his successes in the War of the Spanish Succession. The palace is one of the largest houses in England and was designed in the rare and short-lived English Baroque style by the architect Sir John Vanbrugh.

7.6.7 The Grade I listed Blenheim Palace (**BW0028**) sits within an extensive park in the classic English landscape garden style. This was initially laid out by Vanbrugh but was subsequently altered by Lancelot 'Capability' Brown who created two conjoined substantial ornamental lakes by damming the River Glyme. Both the house and the surrounding park were created from a preceding manor house and estate known as Woodstock Park which had been established as far back as the reign of Henry I (1100 – 1135).

7.6.8 The boundary of the WHS is almost contiguous with the boundary of the Blenheim Palace Grade I Registered Park and Garden (**BW0022**). In addition to the Palace itself, the WHS contains numerous listed buildings including six listed at Grade I and five listed at Grade II*. It also contains five Scheduled Monuments including the possible site of a Romano-Celtic temple (**BW0011**) and a section of a Roman Road known as Akeman Street (**BW0005**).

7.6.9 Two more Registered Parks and Gardens are present within the defined 2 km settings study area. One of these is the Grade II* Registered Tackley Water Garden (**BW0023**) which dates back to the early 17th century. The second is the Grade II Registered garden at Yarnton Manor (**BW0024**).

7.6.10 Three of the five Scheduled Monuments within the Blenheim Place WHS are also within the defined 2 km settings study area, along with a further 17 Scheduled Monuments. These include: a Neolithic long barrow (**BW0006**); a pair of ring ditches likely representing the remains of Bronze Age round barrows (**BW0014**); an Iron Age hillfort (BW0015); a Roman villa or possibly a small settlement (**BW0004**), another Roman villa (**BW0012**) and two

enclosures likely to be of Roman date (**BW0003**; **BW0008**); three shrunken Medieval settlements (**BW0002**; **BW0010**; **BW0020**); three Medieval stone crosses (**BW0009**; **BW0013**; **BW0016**); the site of Eynsham Abbey (**BW0017**); elements of the 17th century water garden at Tackley (**BW0023**); an 18th century bridge over the River Thames (**BW0018**); and a group of undated enclosures and other features recorded as cropmarks on aerial photographs (**BW0019**).

7.6.11 A total of thirteen Conservation Areas are wholly or partially within the defined 2 km settings study area. These comprise eight within West Oxfordshire District (Bladon; Cassington; Church Hanborough; Eynsham; Long Hanborough; Tackley; Woodstock; Wootton), one within Vale of White Horse District (Cumnor) and four within Cherwell District (Begbroke; Hampton Gay, Shipton-on-Cherwell and Thrupp; The Rookery (Kidlington); High Street (Kidlington)). They indicate the locations of historic settlements in the area, and most have their origins in the Early Medieval period, possibly earlier in some cases.

7.6.12 Listed buildings are present within all of the Conservation Areas, with a further group located within the Blenheim Palace WHS as reported above. Most of the listed buildings within the Conservation Areas are listed at Grade II, although within each one there are often one or more listed at Grade I or II*, including several Medieval churches.

7.6.13 There are also some listed buildings within the defined 2 km settings study area that are outside of any designated historic area such as the WHS or a Conservation Area. Most of these are farmhouses and farm buildings which are all listed at Grade II; examples of other building types with a higher grade of listing include Hordley House (**BW0038**) and Yarnton Manor (**BW0056**), both listed at Grade II*.

Non-designated heritage assets

7.6.14 None of the three district planning authorities within which the Site is located currently maintains a District-wide list of non-designated buildings of local historical importance (otherwise known as ‘locally listed buildings’). Some buildings within three of the Conservation Areas designated by West Oxfordshire District Council are identified as ‘Locally Listed Buildings’ on maps produced as part of Conservation Area Appraisal documents, although there is no information regarding this non-statutory designation process. The Cumnor Neighbourhood Development Plan 2021 to 2031 includes a ‘Local List of Heritage Assets’ which includes a number of historic buildings.

7.6.15 The locations of all non-designated heritage assets within the defined 1 km study area are indicated on Figure 7.2 (see Volume 3, Figures), although the ‘Locally Listed Buildings’ identified within the Conservation Area Appraisal documents are not included on that figure, nor are the historic buildings identified in the Cumnor Neighbourhood Development Plan 2021 to 2031. A Project-specific Site Number prefixed BW (Botley West) is used to identify each designated heritage asset on Figure 7.2; additional information on each asset is set out in Volume 3, Appendix 7.1: Historic Environment Desk-Based Assessment of the ES and in Annex A of that document **[EN010147/APP/6.5]**.

7.6.16 The Site is located within the Thames Valley, an area rich in buried archaeological remains of all periods. A considerable amount of investigation of these remains has taken place, often in connection with development activity including large-scale extraction of sands and gravels within the Thames floodplain.

7.6.17 In the vicinity of the Site, major programmes of archaeological work have been undertaken on the Thames floodplain to the east of the Central Site Area, most significantly to the east of Cassington and south of Yarnton. This work identified evidence of settlement from the early Neolithic period onwards, along with ceremonial sites and burials.

7.6.18 Immediately to the south-west of Cassington, rescue excavations ahead of and during gravel extraction examined the site of a possible fortified late Iron Age settlement (or 'oppidum') known as Cassington Big Ring. Neolithic features were also present here, along with possibly as many as 35 ring ditches indicative of Bronze Age round barrows (burial mounds).

7.6.19 A detailed investigation was undertaken ahead of the construction of Farmoor Reservoir on the Thames floodplain to the west of the Southern Site Area. This work resulted in the identification of a limited amount of activity of Early Iron Age date, followed by the establishment during the middle Iron Age of a small settlement with three or four unenclosed farmsteads. Settlement in this area was renewed in the later part of the 3rd century AD and a well-ordered landscape developed at that time with extensive drove and trackway systems, field boundaries, stock enclosures and horticultural plots.

7.6.20 Up until the programme of geophysical survey initiated for the Project, purposive archaeological fieldwork within any part of the Site has been limited mostly to investigations in the vicinity of Purwell Farm, in the southern part of the Central Site Area. Extraction of sand and gravel from to the south and east of the farm during the middle part of the 20th century resulted in the exposure and investigation of archaeological features in several locations. The discoveries here included a burial dated to what is known as the Beaker Period (the transition from the Neolithic to the Bronze Age), along with evidence for activity during the Iron Age and Roman periods. Early Medieval settlement activity was also found here along with at least one cemetery of the same period.

7.6.21 Material of Palaeolithic date has been found within the defined 1 km study area around the main elements of the Site in the form of flint tools. These are most likely to have come from secondary contexts rather than from a primary place of deposition, having been moved to their discovered locations through fluvial action. Similar artefacts may be present in gravels and sands within the Site, particularly within the valleys of the Rivers Thames and Evenlode, but are unlikely to be disturbed from their current positions by the construction, operation and maintenance, or decommissioning of the Project.

7.6.22 Mesolithic activity within the defined study area is also attested predominantly by the presence of flint tools. These are less likely to have moved far from their primary deposition location (when compared to the Palaeolithic examples) but are often found during programmes of surface artefact collection or as

background finds during investigations of archaeological features dating to later periods.

7.6.23 However, a small pit examined during an archaeological investigation of land immediately adjacent to the Northern Site Area could be of Mesolithic date, and similar features may be present within any part of the Site. Evidence for settlement or other more permanent activities is most likely to be found in areas that have the potential for waterlogged deposits, such as palaeochannels within the floodplain of the River Evenlode.

7.6.24 Evidence for Neolithic and Bronze Age activity is widespread within the defined 1 km study area. There is a particular focus on the gravels within the floodplain of the River Thames, but also plenty of sites and features on the gently undulating ground beyond these areas. Ring ditches representing burial monuments of Bronze Age date are widespread, with cemeteries made up of multiple examples but also small groups as well as isolated individual instances. The larger groups are most likely to occur on the river floodplains, but small groups and isolated examples are known from the more elevated land within the Site.

7.6.25 Sites and features representing Iron Age activity are also present across much of the defined 1 km study area, with larger sites such as hillforts and substantial enclosures as well as smaller settlements including unenclosed examples. There are also sites comprising groups of pits that may represent farmsteads for which the evidence of the buildings has now been lost.

7.6.26 Key features for the Roman period include the important military road known as Akeman Street which crosses the Northern Site Area and adjacent to which is a villa or possible a small settlement containing several buildings including a potential temple. Other Roman villas are known or postulated in the vicinity of the Northern Site Area.

7.6.27 The potential for significant Roman remains to be present in this area is emphasised by the discovery during the Project-specific geophysical survey of a probable Romano-Celtic temple complex in an elevated location overlooking the valley of the River Evenlode (in the Central Site Area). This site has not been previously identified and does not appear to show up on any historical aerial photographs. Some of the settlement enclosures that have been recorded as cropmarks on aerial photographs, including examples within the Site, may have originated during the later prehistoric period but continued in use well into the Roman period.

7.6.28 Evidence for Early Medieval activity within the defined 1 km study area includes areas of settlement, but also several inhumation cemeteries are known including examples where the mounds representing Bronze Age round barrows were reused by Anglo-Saxons. These can be found on the river floodplains but are also known from more elevated areas such as Purwell Farm.

7.6.29 There is a reduced potential for remains of Medieval, Post-medieval and Modern activity to be present within the Site given the well-documented history of settlement in the area. However, some settlements have reduced in size or even disappeared altogether and remains associated with these may be present. Elements of the Medieval and Post-medieval landscapes have been

identified through a review of available LiDAR data, and in some areas are retained in the current landscape within and around the Site. This can include areas of woodland as well as boundaries and other earthworks.

7.6.30 Examination has been made of the programme of Historic Landscape Characterisation (HLC) that has been undertaken for Oxfordshire. HLC is an aspect of more general landscape characterisation which seeks to provide an additional element of 'time-depth', allowing the historic evolution of the landscape to be perceived and understood.

7.6.31 Overall, most of the Site falls within defined HLC Types that represent land which has been enclosed (usually formally) and much of which has been subject to boundary loss and reorganisation since the time at which it was enclosed. These HLC Types are regarded as 'Common or even 'Abundant' within Oxfordshire.

7.6.32 There are a few exceptions to this overall position with regard to historic landscape character. These include one field in the Northern Site Area which represents an isolated area of HLC Type 'Ancient Enclosure', one field in the Central Site of HLC Type 'Unenclosed – Rough Ground' and an area of three fields in the Central Site Area adjacent to the River Evenlode which form part of an area of HLC Type 'Water Meadow'. These HLC Types are considered to be Rare or Very Rare within Oxfordshire. The locations of these HLC Types are indicated on Figure 7 in Appendix 7.1: Historic Environment Desk-Based Assessment of the ES **[EN010147/APP/6.5]**.

Site-specific surveys

7.6.33 The results of the geophysical survey work within the Site are presented in Volume 3, Appendix 7.3: Geophysical Survey Report of the ES and summarised within Appendix 7.1: Historic Environment Desk-Based Assessment of the ES **[EN010147/APP/6.5]**. This survey has confirmed the presence of some of the archaeological sites identified from the desk-based studies and in a few cases has provided further details regarding the extent and nature of these sites.

7.6.34 The geophysical survey has also identified the presence of archaeological sites and features of potential archaeological interest, which were not previously known from any other sources.

Future baseline conditions

7.6.35 Future changes to the historic environment baseline could include additions to the list of designated historic assets, e.g. additional designations of Scheduled Monuments, Listed Buildings etc. or amendments to the descriptions of the assets and the area covered by the designation.

7.6.36 Other changes could occur as a result of further information being discovered regarding archaeological sites, possibly through programmes of intrusive fieldwork. As described above, a programme of archaeological trial trenching is ongoing within the Site. This will provide additional information regarding known and potential buried archaeological remains, and may also result in the identification of previously unknown archaeological sites and features.

7.6.37 No substantive changes in statutory legislation on historic environment issues are currently anticipated. Section 102 of the Levelling-up and Regeneration Act 2023 includes provisions relating to the consideration of the settings of certain types of heritage asset within the exercise of planning functions, however, this Section of the Act is not yet in force. Additional guidance may be issued by national statutory advisors or others, including guidance on the assessment process.

7.6.38 No significant change to the historic environment baseline in this area is anticipated to occur as a result of climate change. Drier weather in the summer months may lead to the discovery of as yet unknown archaeological sites that become visible as cropmarks or parchmarks. However, this could also lead to some drying out of deposits (within palaeochannels) which are currently waterlogged or damp and this may result in some loss of significance of these deposits in terms of palaeoenvironmental potential.

Key receptors

7.6.39 **Table 7.12** identifies the receptors taken forward into the assessment.

Table 7.12: Key receptors taken forward to assessment

Receptor	Description	Sensitivity/value
Blenheim Palace WHS	Designed landscape surrounding 18th century grand house.	Very High
Grade I and II* listed buildings	Mostly within historic settlements or the WHS but with a few more isolated examples.	High (or Very High if within or associated with the WHS)
Grade II listed buildings	Mostly within historic settlements or the WHS but with a several more isolated examples.	Medium (or Very High if within or associated with the WHS)
Scheduled Monuments	A wide date range is represented, from Neolithic through to Post-medieval.	High (could be Very High if within the WHS)
Conservation Areas	Thirteen are present within 2 km of the Site.	Medium or High
Buried archaeological remains	Known to be present at numerous locations within the Site.	Up to High
Overall character of the historic landscape	The landscape within the Site is mostly the result of enclosure in the late 18th and early 19th centuries with subsequent boundary losses.	Generally Low but could be higher if part of the setting of the WHS.

7.7 Key Parameters for Assessment

Maximum design scenario

7.7.1 The maximum design scenarios identified in **Table 7.13** have been selected as those having the potential to result in the greatest effect on an identified receptor or receptor group. These scenarios have been selected from the

Project Design Envelope provided in Volume 1, Chapter 6: Project Description of the ES **[EN010147/APP/6.3]**. Any other development scenario is considered to have less significant effects, based on details within the Project Design Envelope (e.g. different infrastructure layout), to that assessed here being taken forward in the final design scheme.

Table 7.13: Maximum design scenario considered for the assessment of potential impacts

Potential Impact Phase	Phase C	Phase O	Phase D	Maximum Design Scenario	Justification
Loss of, or harm to, buried archaeological remains during the construction and decommissioning phases.	✓		✓	**Construction phase** • Construction, operation and maintenance and decommissioning phase – 42 years. • Maximum total developable area for solar arrays – Northern Site Area approximately 247.3 ha. • Maximum total developable area for solar arrays – Central Site Area approximately 545.2 ha. • Maximum total developable area for solar arrays – Southern Site Area approximately 50 ha (without NGET substation), 46 ha (with NGET substation). • Maximum number of solar photovoltaic (PV) modules – approximately 2,200,000. • Maximum height above ground level of solar PV modules – 2.2 m at higher edge • Maximum total number of piles – 1,600,000. • Maximum depth of piles below ground level – 3 m • Maximum number of power converter stations (PCSs) – 156 • Maximum size of PCSs – height 3.5m, length 14.0 m, width 2.9 m. • Applicant Main Project Substation – 1 no. with 2 High Voltage Transformers: height 11 m, length 156 m and width 63 m. • Applicant Secondary Project Substations – 6 no. with 5 High Voltage Transformers and the 6th housing two Medium Voltage Transformers – height 6 m (including isolator), length 18 m, width 10 m. • Cables from the Secondary Project Substations to the Main Substation – maximum depth in roadways 0.85 m, maximum depth in fields 1.2 m, maximum depth in footpaths and verges 0.9 m.	Greatest developable area for solar arrays; number of solar PV modules; number of piles; depth of piles below ground, number and size of PCSs; number and footprint of Secondary Project Substations: footprint of Main Substation; length and width of easement for cable construction; and size of construction compounds represents the greatest potential for impacts on buried archaeological remains. Greatest developable area for solar arrays; number of solar PV modules; height of solar PV modules, number and size of PCSs; number and size of Secondary Project Substations: size of Main Substation; and size of NGET substation represents the greatest potential for impacts on buried archaeological remains and designated heritage assets (including the Blenheim Palace WHS) as a result of change within their setting. Greatest developable area for solar arrays; number of solar PV modules; height of solar PV modules, number and size of PCSs; number and size of Secondary Project Substations: size of Main Substation; and size of NGET substation represents the greatest potential for impacts on the character of the historic landscape.
The impact of construction, operation and maintenance and decommissioning of the Project on the Blenheim Place World Heritage Site as a result of change within its setting.	✓	✓	✓		
The impact of construction, operation and maintenance and decommissioning of the Project on designated and non-designated heritage assets as a result of change within their setting.	✓	✓	✓		
The impact of construction,	✓	✓	✓		

Potential Impact Phase	Phase C O D	Maximum Design Scenario	Justification
operation and maintenance and decommissioning of the Project on the character of the historic landscape.		• National Grid Electricity Transmission (NGET) substation – site area 3.8 ha., footprint of main building 87 m x 30 m, height 12.5 m. **Operation and maintenance phase** • Construction, operation and maintenance and decommissioning phase – 42 years. • Maximum total developable area for solar arrays – Northern Site Area approximately 247.30 ha. • Maximum total developable area for solar arrays – Central Site Area approximately 545.2 ha. • Maximum total developable area for solar arrays – Southern Area Site approximately 50 ha (without NGET substation), 46 ha (with NGET substation). • Maximum number of solar photovoltaic (PV) modules – approximately 2,200,000. • Maximum height above ground level of solar PV modules – 2.2 m at higher edge • Maximum total number of piles – 1,600,000. • Maximum depth of piles below ground level – 3 m • Maximum number of power converter stations (PCSs) – 156 • Maximum size of PCSs – height 3.5m, length 14.0 m, width 2.9 m. • Applicant Main Project Substation – 1 no. with 2 High Voltage Transformers: height 11 m, length 156 m and width 63 m. • Applicant Secondary Project Substations – 6 no. with 5 High Voltage Transformers and the 6th housing two Medium Voltage Transformers – height 6 m (including isolator), length 18 m, width 10 m. • Cables from High Voltage Transformers (Secondary Project Substations) to High Voltage Transformer (Main Substation) – maximum depth in roadways 0.85 m, maximum depth in fields 1.20 m, maximum depth in footpaths and verges 0.9 m.	

Potential Impact Phase	Phase C O D	Maximum Design Scenario	Justification
		• National Grid Electricity Transmission (NGET) substation – site area 3.8 ha., footprint 87 m x 30 m, height 12.5 m. • Nature and maximum height of fencing around areas of solar PV panels – up to 2.1 m • Frequency and maximum height of CCTV cameras – up to 4.0 m • Frequency and maximum height of motion sensor lighting - manually operated lighting and Passive Infra-Red (PIR) motion sensor activated security/emergency lighting, no lights permanently switched on. **Decommissioning phase** • Decommissioning of the Project is expected to last 24 months.	

[a] C=construction, O=operational and maintenance, D=decommissioning

7.8 Mitigation and Enhancement Measures Adopted as Part of the Project

7.8.1 The design process for the Project has been heavily influenced by the findings of early environmental appraisals and the EIA process. The Project has had several measures incorporated into the design to avoid or minimise environmental impacts.

7.8.2 The key aspects where the design has evolved are described in ES Volume 1, Chapter 5: Alternatives Considered **[EN010147/APP/6.3]**. These include measures required for legal compliance, as well as measures that implement the requirements of good practice guidance documents. The assessment has been undertaken on the basis that these measures are incorporated in the design and construction practices (i.e. they are 'embedded mitigation').

7.8.3 Embedded mitigation measures for the construction phase are set out in the ES Volume 1, Chapter 6: Project Description **[EN010147/APP/6.3]**, Appendix 6.1: Project Mitigation Measures and Commitments Schedule **[EN010147/APP/6.5]** and the various management plans outlined in this chapter **[EN010147/APP/7.6]**.

7.8.4 Implementation of embedded mitigation relied upon in the assessment will be secured in the DCO, including by ensuring the works described in Schedule 1 of the DCO are restricted to their corresponding works areas shown on the Works Plans **[EN010147/APP/2.3]**, a DCO requirement requiring compliance of detailed design of the Project to accord with the Outline Design Principles **[EN010147/APP/7.7]**, or through specific DCO requirements requiring compliance with a management strategy, plan, or other requirement document.

7.8.5 Consideration has been given to any ‘additional mitigation’ over and above the embedded mitigation that may be required and has the potential to mitigate any significant adverse effects identified following the assessment of the Project inclusive of its embedded mitigation. Where significant effects remain following the implementation of embedded mitigation and achievable further measures could lower the identified effect, the topic chapter identifies additional mitigation and explains how the additional mitigation is secured, for example via a specific DCO requirement, via a management plan, or document secured by a DCO requirement like the Project Mitigation Measures and Commitments Schedule **[EN010147/APP/6.5]**.

7.8.6 To the extent any likely significant effects are anticipated following the assessment of the Project after the implementation of embedded and additional mitigation, each topic chapter will report these as residual effects. Residual effects for all topics are summarised in Chapter 21: Summary of Significant Environmental Effects of the ES **[EN010147/APP/6.3]**.

7.8.7 Where relevant, measures have also been identified that may result in enhancement of environmental conditions. Enhancement measures are not required to mitigate significant effects of the Project and are not factored into the determination of residual effects. They are further measures which would have additional beneficial outcomes should they be implemented.

7.8.8 Both embedded and additional mitigation measures relevant to this chapter are summarised in **Table 7.14.**

Table 7.14: Mitigation measures intended to be adopted as part of the Project

Commitment number	Measure adopted	How the measure will be secured
Embedded Mitigation		
7.1	A range of designated heritage assets have been directly avoided by the design of the permanent Project developable footprint.	Committed with the project design and secured through the DCO Works Plans **[EN010147/APP/2.3]**
7.2	Other areas containing significant non-designated buried archaeological remains have been directly avoided by the permanent Project developable footprint.	Committed with the project design and secured through the DCO Works Plans **[EN010147/APP/2.3]**
7.3	Areas within the Site containing significant non-designated buried archaeological remains and avoided by the permanent Project developable footprint will be fenced off during construction to ensure that there are no physical impacts within such areas. Any cables required for the Project which need to cross such areas will be placed within protective ducting on the current ground surface.	Committed with the project design and secured through the DCO Works Plans **[EN010147/APP/2.3]**
7.4	Areas within the Site containing significant non-designated buried archaeological remains and avoided by the permanent Project developable footprint will be retained as grassland during the operation and maintenance phase of the Project.	Outline Landscape and Ecology Management Plan **[EN010147/APP/7.6.3]**
7.5	The solar panel type to be used has been selected on the basis of requiring the fewest piles, thereby minimising below-ground impacts of piling.	Committed within the Project design set out in the Outline Design Principles **[EN010147/APP/7.7]**
7.6	Buried archaeological remains of a lower level of significance will be protected through the implementation of a 'no-dig' construction methodology in which any cables required for the Project which need to cross such remains will be placed within protective ducting on the current ground surface.	Outline Code of Construction Practice **[EN010147/APP/7.6.1]**
7.7	Construction haul roads will be established without stripping of topsoil. Terrafirma-type matting may be required in areas of high vehicle	Committed within the Project design set out in the Outline Design Principles **[EN010147/APP/7.7]**

Commitment number	Measure adopted	How the measure will be secured
	usage, on saturated ground and/or to avoid damage to soil structure.	
7.8	Maintenance roads, required for occasional access during the operational phase, will follow routes around the edges of each solar array field and will have a self-compacting 'farm track' type surface. Other internal maintenance routes between solar panels will use the natural ground surface.	Committed within the Project design set out in the Outline Design Principles **[EN010147/APP/7.7]**
7.9	All hedgerows and mature vegetation within the Site will be retained (with limited exceptions where existing field accesses need to be widened) as this provides a major contribution to the character of the historic landscape and also screens views into and across the Project developable footprint.	Outline Landscape and Ecology Management Plan **[EN010147/APP/7.6.3]**
7.10	Additional planting within the Site is designed in part to further screen views into and across the Project developable footprint.	Outline Landscape and Ecology Management Plan **[EN010147/APP/7.6.3]**
7.11	All land used for temporary satellite compounds during construction will be managed as grassland if not required for solar installations.	Committed within the Project design set out in the Outline Design Principles **[EN010147/APP/7.7]**
7.12	Detailed Landscape and Ecology Management Plan (LEMP) will be developed in accordance with the Outline Landscape and Ecology Management Plan (oLEMP). Detailed LEMP will include details of mitigation planting, including the number, location, species and details of management and maintenance of planting. Where practicable, landscape mitigation planting will be established as early as reasonably practicable in the construction phase.	Outline Code of Construction Practice **[EN010147/APP/7.6.1]** and Outline Landscape and Ecology Management Plan **[EN010147/APP/7.6.3]**
7.13	An Outline Code of Construction Practice (CoCP) has been prepared and submitted with the application for development consent. Detailed CoCP(s) will be developed in accordance with the outline CoCP.	Outline Code of Construction Practice **[EN010147/APP/7.6.1]**
7.14	The oCOCP includes a commitment to prepare a Construction Noise and Vibration Management Plan, which will form part of the CoCP and will be approved by the relevant planning	Outline Code of Construction Practice **[EN010147/APP/7.6.1]**

Commitment number	Measure adopted	How the measure will be secured
	authority prior to the start of construction. It will include measures to mitigate noise from construction activities associated with the Project.	
7.15	No permanent operational lighting will be installed. Lighting around the solar arrays and transformers will a combination of manually operated and PIR motion sensor lighting.	Committed within the Project design set out in the Outline Design Principles **[EN010147/APP/7.7]**
7.16	A Decommissioning Plan or Plans will be developed prior to decommissioning. The Decommissioning Plan(s) will include provisions for the removal of all above ground infrastructure and the decommissioning of below ground infrastructure (if and where relevant and practicable), and details relevant to avoidance of ground disturbance. The Decommissioning Plan(s) will be in line with the latest relevant available guidance. The Decommissioning Plan will include provision for the protection (during decommissioning) of areas within the Site which contain significant archaeological remains.	Outline Decommissioning Plan **[EN010147/APP/7.6.4]**
Additional Mitigation		
7.17	One or more Written Scheme(s) of Investigation (WSIs) will be developed in line with the Outline WSI. The WSI(s) will provide details on the archaeological work required ahead of and during construction of the Project.	Secured through an Outline Written Scheme of Investigation **[EN010147/APP/7.6.5]**

7.9 Assessment of effects

7.9.1 The impacts of the construction, operation and maintenance, and decommissioning phases of the Project have been assessed. The potential impacts arising from the construction, operation and maintenance and decommissioning phases of the Project are listed in **Table 7.13**, along with the maximum design scenario against which each impact has been assessed.

7.9.2 A description of the potential effect on receptors caused by each identified impact is given below.

Loss of, or harm to, significant buried archaeological remains

Construction phase

7.9.3 Loss of, or harm to, buried archaeological remains can occur as a result of construction activities including (but not limited to): the installation of panels;

the placement of cables within trenches; the works required to form foundations for the PCSs, the Secondary Project Substations and the Main Project Substation; the works required for the NGET substation; the establishment of internal accesses, movement of construction vehicles within the Site, the planting of new areas of woodland; and the establishment of construction compounds and field compounds.

7.9.4 The construction could also result in any changes to the groundwater regime and/or the compression or compaction of any sub-surface sediments, including deposits of geoarchaeological interest including waterlogged deposits that may contain well-preserved artefacts and ecofacts.

Sensitivity/value of the receptor

7.9.5 The desk-based studies and the programme of geophysical survey has identified that the Site contains buried archaeological remains of likely national importance, and certainly remains of regional and local importance.

7.9.6 The sensitivity/value of the significant buried archaeological remains is therefore **high**.

Magnitude of impact

7.9.7 The desk-based studies and the programme of geophysical survey undertaken within the Site has identified several areas containing buried archaeological remains of likely national and/or regional importance. Each of these areas, along with an appropriate buffer zone, have been taken out of the developable land within the Site. They would be fenced off during construction and any cables required for the Project which need to cross such areas would be placed within protective ducts placed on the surface of the ground. Consequently, there would be no impact on known buried archaeological remains of the highest significance/value during construction.

7.9.8 Further pre-construction geophysical survey and/or trial trenching along the proposed route of the 275 kV cable (where this is outside the three main areas of the Site) could result in the identification of the presence of additional areas containing buried archaeological remains of likely national and/or regional importance. In such situations the design of the construction activities in these areas would seek to avoid or minimise physical impacts on the buried archaeological remains. Design adjustments could include optimisation of the alignment of the cable trench within the Order Limits, also restrictions on topsoil stripping and the use of a geotextile membrane and crushed stone to establish routes for construction traffic. Additional mitigation could be in the form of the implementation of an appropriate programme of archaeological investigation ahead of construction with the subsequent publication of the results and the deposition of the archive.

7.9.9 However, it is also possible that buried archaeological remains of likely national and/or regional importance could be present within the easement required for construction of the 275 kV cable where this is within areas not accessible for pre-construction archaeological surveys, such as roadside verges and within the highway. In this situation the buried archaeological remains would only be discovered during construction and therefore avoidance

through design would not be possible, although impacts would be limited geographically due to other constraints, and it may be feasible to further reduce the impact depending on the nature and extent of the archaeological remains. Additional mitigation could be in the form of the implementation of an appropriate programme of archaeological investigation ahead of and/or during construction with the subsequent publication of the results and the deposition of the archive.

7.9.10 The construction of the Project would not result in any changes to the groundwater regime nor in the compression or compaction of any sub-surface sediments, therefore no impacts are predicted with regard to deposits of significant geoarchaeological interest including waterlogged deposits that may contain well-preserved artefacts and ecofacts.

7.9.11 The impact is predicted to be of local spatial extent and permanent duration. The magnitude is therefore no greater than **low adverse**.

Significance of the effect

7.9.12 Overall, the magnitude of the impact is up to **low adverse** and the sensitivity/ value of the receptor is **high**. The effect will, therefore, be of **minor adverse** significance, which is not significant.

Operation and maintenance phase

Sensitivity/value of the receptor

7.9.13 The desk-based studies and the programme of geophysical survey has identified that the Site contains buried archaeological remains of likely national and/or regional importance.

7.9.14 The sensitivity/value of the significant buried archaeological remains is therefore **high**.

Magnitude of impact

7.9.15 Following completion of construction, each of the identified areas containing buried archaeological remains of likely national and/or regional importance, along with their appropriate buffer zone, would be retained within the Site as grassland. No activities would occur within these areas other than the conservation grazing as set out within Volume 1, Chapter 6: Project Description of the ES.

7.9.16 All of the identified areas containing buried archaeological remains of likely national and/or regional importance are located in land that is currently used for arable farming. This means that the archaeological remains are at risk of damage from cultivation-related activities including regular ploughing. The change in use of these areas containing significant archaeological remains from arable farming to grassland is therefore beneficial as it removes the risk of cultivation-related harm.

7.9.17 This potential beneficial impact is noted within government policy as set out in NPS EN-3 (Department for Energy Security and Net Zero, 2023b), in which paragraph 2.10.110 states: '*Equally, solar PV developments may have a*

positive effect, for example archaeological assets may be protected by a solar PV farm as the site is removed from regular ploughing and shoes or low-level piling is stipulated'.

7.9.18 There would not be any impacts during the operation and maintenance phase with regard to areas containing buried archaeological remains of likely national and/or regional importance along the 275 kV cable route (where this is outside the three main areas of the Site).

7.9.19 The impact is predicted to be of local spatial extent and long-term duration. The magnitude is therefore **low beneficial**.

Significance of the effect

7.9.20 Overall, the magnitude of the impact is **low beneficial** and the sensitivity/ value of the receptor is **high**. The effect will, therefore, be of **minor beneficial** significance, which is not significant.

Decommissioning phase

7.9.21 Loss of, or harm to, buried archaeological remains can occur as a result of decommissioning activities including (but not limited to): the removal of panels and cables, the removal of foundations for the PCSs, the Secondary Project Substations and the Main Project Substation; movement of vehicles within the Site; and establishment and removal of compounds and laydown areas.

7.9.22 The decommissioning could also result in changes to the groundwater regime and/or the compression or compaction of any sub-surface sediments, including deposits of geoarchaeological interest including waterlogged deposits that may contain well-preserved artefacts and ecofacts. No such deposits have been identified within the Site.

Sensitivity/value of the receptor

7.9.23 The desk-based studies and the programme of geophysical survey has identified that the Site contains buried archaeological remains of likely national and/or regional importance.

7.9.24 The sensitivity/value of the significant buried archaeological remains is therefore **high**.

Magnitude of impact

7.9.25 The Decommissioning Plan(s) would include measures for the protection of buried archaeological remains of likely national and/or regional importance. An Outline Decommissioning Plan has been prepared (document reference 7.6.4) and this explains that a Decommissioning Environmental Management Plan (DEMP) and a Decommissioning Traffic Management Plan (DTMP) would be produced and approved prior to the decommissioning phase of the Project.

7.9.26 The Outline Decommissioning Plan contains information regarding the nature of the decommissioning and includes consideration of the measures proposed for the protection of the historic environment (see Table 3.1: Decommissioning Mitigation and Management Measures in document reference 7.6.4).

7.9.27 The decommissioning of the Project would not result in any changes to the groundwater regime nor in the compression or compaction of any sub-surface sediments, therefore no impacts are predicted with regard to deposits of significant geoarchaeological interest including waterlogged deposits that may contain well-preserved artefacts and ecofacts.

7.9.28 The magnitude of impact is predicted to be **no change**.

Significance of the effect

7.9.29 Overall, the magnitude of the impact is **no change** and the sensitivity/value of the receptor is **high**. The effect will, therefore, be **no change**, which is not significant.

Loss of, or harm to, less significant buried archaeological remains

Construction phase

7.9.30 Loss of, or harm to, buried archaeological remains can occur as a result of construction activities including (but not limited to): the installation of panels; the placement of cables within trenches; the works required to form foundations for the PCSs, the Secondary Project Substations and the Main Project Substation; the works required for the NGET substation; the establishment of internal accesses and maintenance routes, movement of construction vehicles within the Site, the planting of new areas of woodland; and the establishment of construction compounds and field compounds.

Sensitivity/value of the receptor

7.9.31 The desk-based studies and the programme of geophysical survey has identified that the Site contains buried archaeological remains of likely local importance.

7.9.32 The sensitivity/value of the significant buried archaeological remains is therefore **low**.

Magnitude of impact

7.9.33 Areas identified as containing buried archaeological remains of likely local importance will be further examined through the programme of trial trenching. Once further information is available regarding the nature and extent of such remains, appropriate strategies to reduce impacts during construction would be agreed with the archaeological advisor to the local authorities via the Written Scheme of Investigation. This could include the placement of any cables required for the Project which need to cross such remains being placed within protective ducts placed on the surface of the ground, or the implementation of an appropriate programme of archaeological investigation ahead of construction with the subsequent publication of the results and the deposition of the archive.

7.9.34 Further pre-construction geophysical survey and/or trial trenching along the proposed route of the 275 kV cable (where this is outside the three main areas of the Site) could result in the identification of the presence of additional areas

containing buried archaeological remains of likely local importance. In such situations the design of the construction activities in these areas would seek to avoid or minimise physical impacts on the buried archaeological remains. Design adjustments could include optimisation of the alignment of the cable trench within the Order Limits, also restrictions on topsoil stripping and the use of a geotextile membrane and crushed stone to establish routes for construction traffic. Additional mitigation could be in the form of the implementation of an appropriate programme of archaeological investigation ahead of construction with the subsequent publication of the results and the deposition of the archive.

7.9.35 However, it is also possible that buried archaeological remains of likely local importance could be present within the easement required for construction of the 275 kV cable where this is within areas not accessible for pre-construction archaeological surveys, such as roadside verges and within the highway. In this situation the buried archaeological remains would only be discovered during construction and therefore avoidance through design would not be possible, although impacts would be limited geographically due to other constraints, and it may be feasible to further reduce the impact depending on the nature and extent of the archaeological remains. Additional mitigation could be in the form of the implementation of an appropriate programme of archaeological investigation ahead of and/or during construction with the subsequent publication of the results and the deposition of the archive.

7.9.36 The impact is predicted to be of local spatial extent and permanent duration, and the heritage significance of these buried archaeological remains may be slightly harmed. The magnitude is therefore no greater than **low adverse**.

Significance of the effect

7.9.37 Overall, the magnitude of the impact is up to **low adverse** and the sensitivity/ value of the receptor is **low**. The effect will, therefore, be of up to **minor adverse** significance, which is not significant.

Operation and maintenance phase

Sensitivity/value of the receptor

7.9.38 The desk-based studies and the programme of geophysical survey has identified that the Site contains buried archaeological remains of likely local importance.

7.9.39 The sensitivity/value of the significant buried archaeological remains is therefore **low**.

Magnitude of impact

7.9.40 All of the identified areas containing buried archaeological remains of likely local importance are located in land that is currently used for arable farming. This means that the archaeological remains are at risk of damage from cultivation-related activities including regular ploughing. The change in use of these areas containing significant archaeological remains from arable farming

to solar farm with conservation grazing grassland is therefore beneficial as it removes the risk of cultivation-related harm.

7.9.41 This potential beneficial impact is noted within government policy as set out in NPS EN-3 (Department for Energy Security and Net Zero, 2023b), in which paragraph 2.10.110 states: '*Equally, solar PV developments may have a positive effect, for example archaeological assets may be protected by a solar PV farm as the site is removed from regular ploughing and shoes or low-level piling is stipulated*'.

7.9.42 There would not be any impacts during the operation and maintenance phase with regard to areas containing buried archaeological remains of likely local importance along the 275 kV cable route (where this is outside the three main areas of the Site).

7.9.43 The impact is predicted to be of local spatial extent and long-term duration. The magnitude is therefore **low beneficial**.

Significance of the effect

7.9.44 Overall, the magnitude of the impact is **low beneficial** and the sensitivity/ value of the receptor is **low**. The effect will, therefore, be of up to **minor beneficial** significance, which is not significant.

Decommissioning phase

7.9.45 Loss of, or harm to, buried archaeological remains can occur as a result of decommissioning activities including (but not limited to): the removal of panels and cables, the removal of foundations for the PCSs, the Secondary Project Substations and the Main Project Substation; movement of vehicles within the Site; and establishment and removal of compounds and laydown areas.

Sensitivity/value of the receptor

7.9.46 The desk-based studies and the programme of geophysical survey has identified that the Site contains buried archaeological remains of likely local importance.

7.9.47 The sensitivity/value of the significant buried archaeological remains is therefore **low**.

Magnitude of impact

7.9.48 The Decommissioning Plan(s) would include measures for the protection of buried archaeological remains of likely local importance. An Outline Decommissioning Plan has been prepared **[EN010147/APP/7.6.4]** and this explains that a Decommissioning Environmental Management Plan (DEMP) and a Decommissioning Traffic Management Plan (DTMP) would be produced and approved prior to the decommissioning phase of the Project.

7.9.49 The Outline Decommissioning Plan contains information regarding the nature of the decommissioning and includes consideration of the measures proposed for the protection of the historic environment (see Table 3.1: Decommissioning Mitigation and Management Measures **[EN010147/APP/7.6.4]**).

7.9.50 The magnitude of impact is predicted to be **no change**.

Significance of the effect

7.9.51 Overall, the magnitude of the impact is **no change** and the sensitivity/value of the receptor is **low**. The effect will, therefore, be **no change**, which is not significant.

Harm to the significance of the Blenheim Place World Heritage Site as a result of change within its setting

7.9.52 No part of the Site is located within the defined boundary of the Blenheim Palace WHS, therefore any impact would arise as a result of change within the setting of the WHS. It is considered that any impact would be the same for each of the construction, operation and maintenance, and decommissioning phases.

Sensitivity/value of the receptor

7.9.53 The sensitivity/value of the Blenheim Palace WHS is **very high**.

Magnitude of impact

7.9.54 A separate Heritage Impact Assessment (HIA) has been undertaken for the Blenheim Palace WHS, in accordance with the appropriate guidance produced on behalf of the United Nations Educational, Scientific and Cultural Organisation (UNESCO). This is presented as Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES.

7.9.55 The HIA identified that the construction, operation and maintenance, and decommissioning of the Project would result in a minor negative impact on one of the seven defined attributes which contribute towards the Outstanding Universal Value (OUV) of the WHS. On this basis, the magnitude of impact on the significance of the WHS is predicted to be **negligible adverse**. This impact would be time-limited and fully reversible.

Significance of the effect

7.9.56 Overall, the magnitude of the impact is **negligible adverse** and the sensitivity/value of the receptor is **very high**. The effect will, therefore, be of **minor adverse** significance, which is not significant.

Harm to the significance of designated heritage assets as a result of change within their setting

7.9.57 The Site is within the settings of designated heritage assets including Scheduled Monuments, listed buildings, Conservation Areas and a Registered Park and Garden.

7.9.58 Changes within the settings of designated heritage assets could include visual change arising from the various elements of the Project such as solar PV

panels, PCSs, Secondary Project Substations, Main Project Substation, NGET substation (if this is located within the Site), fencing (temporary and permanent), lighting, access and maintenance tracks, compounds etc. There could also be impacts from noise and possibly from dust during construction.

7.9.59 The scale of visual change would increase throughout the construction phase as the development progresses. Some of the visual changes may decrease during the early part of the operation and maintenance phase as new planting matures and screens elements of the development when viewed from some locations. The scale of visual change would then decrease throughout the decommissioning phase as elements of the Project are removed.

7.9.60 Mitigation of impacts during the construction phase would be achieved through the implementation of the measures set out in the Outline Code of Construction Practice (oCoCP) **[EN010147/APP/7.6.1]** and the Outline Construction Traffic Management Plan (which is an annex to the oCoCP **[EN010147/APP/7.6.1])**. Mitigation of impacts during the operation and maintenance phase would be achieved through the implementation of the measures set out in the Outline Landscape and Environmental Management Plan **[EN010147/APP/7.6.3]** and the Outline Operational Management Plan **[EN010147/APP/7.6.2]**.

7.9.61 An Outline Decommissioning Plan has been prepared **[EN010147/APP/7.6.4]** and this explains that a Decommissioning Environmental Management Plan (DEMP) and a Decommissioning Traffic Management Plan (DTMP) would be produced and approved prior to the decommissioning phase of the Project.

7.9.62 The Outline Decommissioning Plan contains information regarding the nature of the decommissioning and includes consideration of the measures proposed for the protection of the historic environment (see Table 3.1: Decommissioning Mitigation and Management Measures **[EN010147/APP/7.6.4]**).

7.9.63 For the purposes of this assessment it is considered that any impact arising from change within the settings of designated heritage assets would be the same for each of the construction, operation and maintenance, and decommissioning phases.

7.9.64 The detailed assessment of impacts and effects is presented within Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]**. **Table 7.15** presents the results of that assessment in summary form. The detailed assessment found that the construction, operation and maintenance, and decommissioning of the Project would result in effects of **minor adverse** significance in respect of three Scheduled Monuments, one Grade I Registered Park and Garden, two Grade I listed buildings, two Grade II* listed buildings, eleven Grade II listed buildings and four Conservation Areas, also effects of **negligible adverse** significance in respect of one Grade II listed building and one Conservation Area. In all cases the effect would be long-term and fully reversible.

Table 7.15: Impact of the Project on designated heritage assets

Asset name	NHLE number	Asset type	Sensitivity/value	Magnitude of impact	Significance of effect
Sansom's Platt Roman Villa	1006346	Scheduled Monument	High	Negligible adverse	Minor adverse
Rectangular earthwork, Hensington	1006357	Scheduled Monument	High	Negligible adverse	Minor adverse
Blenheim Villa and associated field system	1021367	Scheduled Monument	High	Negligible adverse	Minor adverse
Blenheim Palace	1000434	Grade I Registered Park and Garden	Very High	Negligible adverse	Minor adverse
Church of St Peter and St Paul, Church Hanborough	1052991	Grade I listed building	High	Negligible adverse	Minor adverse
Church of St Peter, Cassington	1367949	Grade I listed building	High	Negligible adverse	Minor adverse
Hordley House, Wootton	1283262	Grade II* listed building	High	Negligible adverse	Minor adverse
Church of St Michael, Begbroke	1291232	Grade II* listed building	High	Negligible adverse	Minor adverse
Swinford Bridge, Oxford Road	1284764	Grade II* listed building	High	No change	No change
Group of buildings at Lower Dornford Farm	1052906 1199705 1052907 1199714	Grade II listed buildings	Medium	Negligible adverse	Minor adverse
Two buildings at Shipton Slade Farm	1210435 1290426	Grade II listed buildings	Medium	Negligible adverse	Minor adverse

Asset name	NHLE number	Asset type	Sensitivity/value	Magnitude of impact	Significance of effect
Column of Victory, Blenheim Park	1368002	Grade II listed building	Very High	No change	No change
Church of St Martin, Bladon	1053025	Grade II listed building	Very High	No change	No change
Spring Hill, Yarnton	1210637	Grade II listed building	Medium	Negligible adverse	Minor adverse
Burleigh Farmhouse	1198551	Grade II listed building	Medium	Low adverse	Minor adverse
Mill Farmhouse and attached mill building	1283600	Grade II listed building	Medium	Low adverse	Minor adverse
Dunbar (New Farm Farmhouse), Church Hanborough	1198923	Grade II listed building	Medium	Low adverse	Minor adverse
Group of Grade II listed buildings at City Farm, Eynsham	1052428 1198172 1052429 1198161	Grade II listed buildings	Medium	No change	No change
Toll Gate House attached to Swinford Bridge	1048311	Grade II listed building	Medium	No change	No change
Milestone at NGR SP 4468 0725, Oxford Road	1181978	Grade II listed building	Medium	Low adverse	Minor adverse
Red House Farmhouse, Eynsham Road	1048341	Grade II listed building	Medium	Negligible adverse	Negligible adverse
Upper Whitley Farmhouse, Cumnor	1368588	Grade II listed building	Medium	No change	No change
Wootton Conservation Area	N/A	Conservation Area	Medium	Low adverse	Minor adverse

Asset name	NHLE number	Asset type	Sensitivity/value	Magnitude of impact	Significance of effect
Bladon Conservation Area	N/A	Conservation Area	Medium	Low adverse	Minor adverse
Begbroke Conservation Area	N/A	Conservation Area	Medium	Negligible adverse	Negligible adverse
Church Hanborough Conservation Area	N/A	Conservation Area	Medium	Low adverse	Minor adverse

Harm to the significance of non-designated heritage assets as a result of change within their setting

7.9.65 It is considered that any impact arising from change within the settings of non-designated heritage assets would be the same for each of the construction, operation and maintenance, and decommissioning phases.

7.9.66 The defined 2 km settings study area contains numerous non-designated heritage assets in the form of historic buildings which are not on the statutory list maintained by Historic England. The detailed assessment of impacts and effects presented as Volume 3, Appendix 7.5: Settings Assessment of the ES **[EN010147/APP/6.5]** considered historic buildings which have been identified within a Conservation Area Appraisal or Neighbourhood Plan as being of local interest and which could be affected by the Project in terms of the change within their setting. Only one such building was identified. This is Tumbledown Cottage at Filchampstead, which is included on a 'Local List of Heritage Assets' established as part of the Cumnor Neighbourhood Development Plan 2021 to 2031. The location of this non-designated historic building is indicated on Figure 7.2l of the ES **[EN010147/APP/6.4]**.

Sensitivity/value of the receptor

7.9.67 As a non-designated historic building, Tumbledown Cottage is of **low** sensitivity/value.

Magnitude of impact

7.9.68 The detailed assessment of impacts and affects resulting from changes within the settings of designated heritage assets presented as Volume 3, Appendix 7.5: Settings Assessment of the ES identified that the heritage significance of the building would be slightly harmed, therefore the magnitude of impact as a result of the change within its setting is considered to be **low adverse**.

Significance of the effect

7.9.69 Overall, the magnitude of the impact is **low adverse** and the sensitivity/value of the receptor is **low**. This has been assessed as resulting in a long-term and fully reversible effect of **minor adverse** significance, which is not significant.

Harm to the character of the historic landscape

Construction phase

Sensitivity/value of the receptor

7.9.70 The character of the historic landscape across almost all of the Site is typical of much of Oxfordshire, with the individual Historic Landscape Character (HLC) Types being common or abundant within the county. The locations of these HLC Types are indicated on Figure 7 in Appendix 7.1: Historic Environment Desk-Based Assessment of the ES **[EN010147/APP/6.5]**.

7.9.71 The HLC Types are predominantly different types of enclosure; this was a gradual process occurring within the Post-medieval and Modern periods through which the larger open fields, commons and areas of 'waste' that had been established largely during the Medieval period were divided into smaller fields with straight boundaries. Often the adjacent roads and tracks were also straightened as part of this process, which was aimed at making farming easier (and more profitable) for individual landowners and their tenant farmers following the removal of common rights.

7.9.72 HLC Types within the Site include 'Planned Enclosure' which often covers land enclosed via a Parliamentary Act, and 'Prairie/Amalgamated Enclosure' which represents the removal of boundaries from within enclosed land to create larger fields (a process which usually occurred in the period after the Second World War). There are also areas of 'Reorganised Enclosures' which again reflect adaptation of enclosed land and boundary loss.

7.9.73 Other HLC Types within the Site are defined as 'Piecemeal Enclosure' and 'Ancient Enclosure' which both represent enclosure through informal agreement and this is likely to have occurred prior to the 18th century.

7.9.74 There are two isolated fields that have historic landscape character types considered to be rare within the county and a small group of three fields that share a historic landscape character type considered to be very rare within the county. This latter group lies outside the land within which development is proposed and would remain unchanged.

7.9.75 Enclosure landscapes are common within most of Oxfordshire. Where the enclosed fields have been subject to reorganisation and boundary loss (as is the case with much of the land within the Site), the sensitivity/value of the character of the historic landscape would usually be considered to be **low**.

7.9.76 However, the historic landscape within the Northern Site Area and the Central Site Area forms part of the setting of the Blenheim Palace WHS. The enclosure of the land here was strongly linked to the strategies of land acquisition and disposal carried out by or on behalf of the dukes of Marlborough (additional information on this is provided within Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES **[EN010147/APP/6.5]**). This association enhances the sensitivity/value of the character of the historic landscape in these areas, which is therefore considered to be **medium**.

Magnitude of impact

7.9.77 Any impact on the character of the historic landscape during construction would occur through the visual changes as the development progresses. There would also be some construction noise, although this is unlikely to differ significantly from the noise associated with the current agricultural activities. An assessment of the impacts of construction noise is presented within Chapter 13: Noise and Vibration of the ES **[EN010147/APP/6.3]**. No significant construction noise effects are predicted.

7.9.78 No physical components of the historic landscape would be removed in order to construct the Project. All woodland, field boundaries, public footpaths, bridleways etc would remain in place. Consequently, the major part of the

change to the historic landscape during construction would be the establishment and use of the temporary construction compounds and construction access routes along with the gradual replacement of the visible arable and pastoral farmland with solar PV panels and the associated elements such as PCS units and Secondary Project Substations. There would also be planting of new hedgerows and trees, along with planting to reinforce existing hedgerows. Impacts on the character of the historic landscape would be fully reversible and medium-term, and the heritage significance of the historic landscape would be slightly harmed. The magnitude of impact has been assessed as **low adverse**.

Significance of the effect

7.9.79 Overall, the magnitude of the impact is **low adverse** and the sensitivity/value of the receptor is **medium**. The effect will, therefore, be of **minor adverse** significance, which is not significant.

Operation and maintenance phase

Sensitivity/value of the receptor

7.9.80 As set out above in the assessment of construction impacts on the character of the historic landscape, this character across almost all of the Site is typical of much of Oxfordshire. The sensitivity/value of the character of the historic landscape would therefore usually be considered to be **low**.

7.9.81 However, the historic landscape within the Northern Site Area and the Central Site Area forms part of the setting of the Blenheim Palace WHS. This association enhances the sensitivity/value of the character of the historic landscape in these areas, which is therefore considered to be **medium**.

Magnitude of impact

7.1.1.1 Any impact on the character of the historic landscape during operation and maintenance would occur through the visual changes as the current arable and pastoral use of the land would be replaced by areas predominantly comprising solar PV panels along with associated elements such as PCS units and Secondary Project Substations and also internal maintenance tracks. There would also be deer-proof fencing 1.8 m to 2.1 m high around each area of solar PV panels along with security cameras and motion-activated lighting. The NGET substation might be located within the Southern Site Area, although the historic landscape here has a **low** sensitivity/value.

7.1.1.2 No physical components of the historic landscape would be removed in order to operate and maintain the Project. Some components of the historic landscape may be strengthened through reinforcement of existing hedgerows, whilst some existing footpaths may be more visually prominent as a result of the planting of new hedgerows along each side. The planting of new blocks of woodland as part of the landscape and ecological mitigation would not affect the character of the historic landscape as similar woodland blocks are already present. An assessment of the impacts of operational noise is presented within Chapter 13: Noise and Vibration of the ES **[EN010147/APP/6.3]**. No

significant operational noise effects are predicted. Impacts on the character of the historic landscape would be long-term and fully reversible (although areas of landscape planting are likely to be retained), and the heritage significance of the historic landscape would be slightly harmed. The magnitude of impact has been assessed as **low adverse**.

Significance of the effect

7.9.82 Overall, the magnitude of the impact is **low adverse** and the sensitivity/value of the receptor is **medium**. The effect will, therefore, be of **minor adverse** significance, which is not significant.

Decommissioning phase

7.9.83 As set out above in the assessment of construction impacts on the character of the historic landscape, this character across almost all of the Site is typical of much of Oxfordshire. The sensitivity/value of the character of the historic landscape would therefore usually be considered to be **low**.

7.9.84 However, the historic landscape within the Northern Site Area and the Central Site Area forms part of the setting of the Blenheim Palace WHS. This association enhances the sensitivity/value of the character of the historic landscape in these areas, which is therefore considered to be **medium**.

Magnitude of impact

7.9.85 An Outline Decommissioning Plan **[EN010147/APP/7.6.4]** has been prepared and this explains that a Decommissioning Environmental Management Plan (DEMP) and a Decommissioning Traffic Management Plan (DTMP) would be produced and approved prior to the decommissioning phase of the Project.

7.9.86 The Outline Decommissioning Plan contains information regarding the nature of the decommissioning and includes consideration of the measures proposed for the protection of the historic environment (see Table 3.1: Decommissioning Mitigation and Management Measures **[EN010147/APP/7.6.4]**.

7.9.87 No physical components of the historic landscape would be removed in order to decommission the Project. Any impact on the character of the historic landscape during decommissioning construction would occur through the visual changes as the work progresses. There would also be some noise, although this is unlikely to be significant. An assessment of the impacts of decommissioning noise is presented within Chapter 13: Noise and Vibration of the ES **[EN010147/APP/6.3]**. No significant decommissioning noise effects are predicted.

7.9.88 Impacts on the character of the historic landscape during decommissioning would be medium-term and fully reversible (although areas of landscape planting are likely to be retained) and the heritage significance of the historic landscape would be slightly harmed. The magnitude of impact has been assessed as **low adverse**.

Significance of the effect

7.9.89 Overall, the magnitude of the impact is **low adverse** and the sensitivity/value of the receptor is **medium**. The effect will, therefore, be of up to **minor adverse** significance, which is not significant.

Future monitoring

7.9.90 No monitoring to test the predictions made within the impact assessment is considered necessary.

7.10 Cumulative Effects

7.10.1 The historic environment CEA methodology has followed the methodology set out in Volume 1, Chapter 4: Approach to Environmental Assessment **[EN010147/APP/6.3]**. As part of the assessment; all projects and plans considered alongside the Project have been allocated into 'tiers' reflecting their current stage within the planning and development process.

- Tier 1
  - Under construction
  - Permitted application
  - Submitted application
  - Those currently operational that were not operational when baseline data were collected, and/or those that are operational but have an ongoing impact
- Tier 2
  - Scoping report has been submitted
- Tier 3
  - Scoping report has not been submitted
  - Identified in the relevant Development Plan
  - Identified in other plans and programmes.

7.10.2 This assessment is followed by all other relevant projects, identified by tier.

7.10.3 This tiered approach is adopted to provide a clear assessment of the Project alongside other projects, plans and activities.

7.10.4 The specific projects, plans and activities scoped into the CEA, are outlined in **Table 7.16**.

7.10.5 It is acknowledged that some 90 potential cumulative schemes were identified, forming the CEA long list. This list of schemes has been reviewed as part of the assessment, with 79 being discounted for one or more of the following reasons:

- The cumulative development is outwith the defined 2 km study area identified for the assessment of impacts arising from change within the setting of designated heritage assets;

- The cumulative scheme is of a scale/type which is anticipated to not cause a significant or any cumulative effect; and
- The cumulative scheme has already been completed and therefore forms part of the current baseline.

7.10.6 None of the cumulative schemes are located within the Site, therefore there is no potential for cumulative effects in respect of buried archaeological remains.

Table 7.16: List of other projects, plans and activities considered within the CEA

Project/Plan	Status	Distance from the Project (nearest point, km)	Description of project/plan	Dates of construction (if applicable)	Dates of operation (if applicable)	Overlap with the Project
Tier 1						
20/01734/OUT	Outline Planning Application – decision pending	Immediately adjacent to Central Site Area	Outline application for Salt Cross Garden Village – 2,200 dwellings and 40 ha. of employment land.	To be confirmed	To be confirmed	To be confirmed
20/0187/FUL Land between Woodstock Sewage Works and B4027	Full Planning Application – permitted	Immediately adjacent to Northern Site Area	Blenheim Net Zero solar farm, 5MW generating capacity on 11 ha. of land.	Under construction	To be confirmed	To be confirmed
21/00189/FUL	Full Planning Application - permitted	1.0 km west of Northern Site Area	Land north of Hill Rise, Woodstock, residential development of 180 dwellings.	To be confirmed	To be confirmed	To be confirmed
21/00127/OUT	Outline Planning Application – decision pending	0.3 km west of Northern Site Area	Land north of Banbury Road, Woodstock, residential development of 235 dwellings.	To be confirmed	To be confirmed	To be confirmed
16/01364/OUT	Under construction	0.8 km south west of Northern Site Area	Land east of Woodstock, residential development of 300 dwellings.	Commenced		
21/03522/OUT	Outline Planning Application – decision pending	0.35 km west of Central Site Area	West of Rutten Lane, Yarnton, residential development of up to 540 dwellings.	To be confirmed	To be confirmed	To be confirmed

Project/Plan	Status	Distance from the Project (nearest point, km)	Description of project/plan	Dates of construction (if applicable)	Dates of operation (if applicable)	Overlap with the Project
22/01008/CCREG	Under construction	Immediately adjacent to Central Site Area	Eynsham Park and Ride and Science Transit	Commenced		
Tier 2						
P22/V0144/SCR Red House Farm, Botley	Application withdrawn	Immediately adjacent to Southern Site Area	Request for a Scoping Opinion regarding a proposed solar farm on approximately 63.1 ha. of land.	To be confirmed	To be confirmed	To be confirmed
Tier 3						
EW4	Allocation – West Oxfordshire DC	1.0 km west of Northern Site Area	Land north of Hill Rise, Woodstock, residential development of 180 dwellings – same site as Tier 1 application 21/00189/FUL	To be confirmed	To be confirmed	To be confirmed
EW5	Allocation – West Oxfordshire DC	0.3 km west of Northern Site Area	Land north of Banbury Road, Woodstock, residential development of 180 dwellings – same site as Tier 1 application 21/00127/OUT	To be confirmed	To be confirmed	To be confirmed
P9	Allocation – Cherwell DC	Immediately adjacent to Central Site	Land west of Yarnton, residential development of 540 dwellings – same site as Tier 1 application 21/03522/OUT (although the allocation extends further west to the boundary of the Botley West site).	To be confirmed	To be confirmed	To be confirmed
N/A	N/A	Adjacent/within the Order Limits	The NGET substation is not part of the Project but may be located within or adjacent to the Site.	To be confirmed	To be confirmed	To be confirmed

Maximum design scenario – cumulative effects assessment

7.10.7 The maximum design scenarios identified in **Table 7.17** have been selected as those having the potential to result in the greatest effect on an identified receptor or receptor group. The cumulative effects presented and assessed in this section have been selected from the Project Design Envelope provided in Volume 1, Chapter 6: Project Description, of the ES as well as the information available on other projects and plans, in order to inform a 'maximum design scenario'. Any other development scenario is considered to have less significant effects, based on details within the Project Design Envelope (e.g., different foundation type or substation layout), to that assessed here, being taken forward in the final design scheme.

Table 7.17: Maximum design scenario for the assessment of cumulative effects

Potential cumulative effect	Phase			Maximum Design Scenario	Justification
	C	O	D		
The impact of the Project on the significance of designated heritage assets arising from changes within their settings during construction, operation and maintenance, and decommissioning. The impact of the Project on the character of the historic landscape during construction, operation and maintenance, and decommissioning.	✓	✓	✓	Maximum design scenario as described for the Project (**Table 7.13**) assessed cumulatively with the following other projects/plans: **Tier 1** • 20/0187/FUL Land between Woodstock Sewage Works and B4027 – Blenheim Net Zero solar farm. • 21/00189/FUL Land north of Hill Rise, Woodstock, residential development of 180 dwellings. • 21/00127/OUT Land north of Banbury Road, Woodstock, residential development of 235 dwellings. • 16/01364/OUT Land east of Woodstock, residential development of 300 dwellings. • 21/03522/OUT West of Rutten Lane, Yarnton, residential development of up to 540 dwellings. • 20/01734/OUT Outline application for Salt Cross Garden Village – 2,200 dwellings and 40 ha. of employment land. • 22/01008/CCREG Eynsham Park and Ride and Science Transit. **Tier 2** • P22/V0144/SCR Red House Farm solar farm on c. 63.1 ha. of land. **Tier 3** • EW4 WODC Allocation - Land north of Hill Rise, Woodstock, residential development of 180 dwellings (same site as Tier 1 application 21/00189/FUL).	Outcome of the CEA will be greatest when the greatest number of other schemes are considered.

Potential cumulative effect	Phase			Maximum Design Scenario	Justification
	C	O	D		
				• EW5 WODC Allocation - Land north of Banbury Road, Woodstock, residential development of 180 dwellings (same site as Tier 1 application 21/00127/OUT). • P9 CDC Allocation - Land west of Yarnton, residential development of 540 dwellings (same site as Tier 1 application 21/03522/OUT, although the allocation extends further west to the boundary of the Botley West site. • The NGET substation has been assessed as part of the Project but alternatively it may be located adjacent to the Site. In this situation the land identified within the Site for the NGET substation would be developed with solar PV panels. The placement of the NGET substation outside the Order Limits could give rise to cumulative effects.	

[a] C=construction, O=operational and maintenance, D=decommissioning

7.11 Cumulative effects assessment

7.11.1 A description of the significance of cumulative effects upon the historic environment receptors arising from each identified impact is given below.

Harm to the significance of the Blenheim Place World Heritage Site as a result of change within its setting

Tier 1 projects

20/0187/FUL Land between Woodstock Sewage Works and B4027 – Blenheim Net Zero solar farm.

7.11.2 This small solar farm is within the setting of the Blenheim Palace WHS. It is currently under construction and should be operational ahead of the construction of the Project. It would appear to be part of the Project as it would be very similar in appearance and is directly adjacent to the Project.

Construction phase

7.11.3 Should there be any temporal overlap between the construction phase of the Project and the operation and maintenance or decommissioning phases of the Blenheim New Zero solar farm, the cumulative impact on the significance of the Blenheim Palace WHS would be no greater than for the Project when considered on its own.

Sensitivity/value of the receptor

7.11.4 The sensitivity/value of the Blenheim Palace WHS is **very high**.

Magnitude of impact

7.11.5 The magnitude of impact on the significance of the WHS is predicted to be **negligible adverse**. This impact would be time-limited and fully reversible.

Significance of the effect

7.11.6 Overall, the magnitude of the impact is **negligible adverse** and the sensitivity/value of the receptor is **very high**. The effect will, therefore, be of **minor adverse** significance, which is not significant.

Operation and maintenance phase

7.11.7 Should there be any temporal overlap between the operation and maintenance phase of the Project and the operation and maintenance or decommissioning phases of the Blenheim New Zero solar farm, the cumulative impact on the significance of the Blenheim Palace WHS would be no greater than for the Project when considered on its own.

Sensitivity/value of the receptor

7.11.8 The sensitivity/value of the Blenheim Palace WHS is **very high**.

Magnitude of impact

7.11.9 The magnitude of impact on the significance of the WHS is predicted to be **negligible adverse**. This impact would be time-limited and fully reversible.

Significance of the effect

7.11.10 Overall, the magnitude of the impact is **negligible adverse** and the sensitivity/value of the receptor is **very high**. The effect will, therefore, be of **minor adverse** significance, which is not significant.

Decommissioning phase

7.11.11 Should there be any temporal overlap between the decommissioning phase of the Project and the operation and maintenance or decommissioning phases of the Blenheim New Zero solar farm, the cumulative impact on the significance of any designated heritage asset would be no greater than for the Project when considered on its own.

Sensitivity/value of the receptor

7.11.12 The sensitivity/value of the Blenheim Palace WHS is **very high**.

Magnitude of impact

7.11.13 The magnitude of impact on the significance of the WHS is predicted to be **negligible adverse**. This impact would be time-limited and fully reversible.

Significance of the effect

7.11.14 Overall, the magnitude of the impact is **negligible adverse** and the sensitivity/value of the receptor is **very high**. The effect will, therefore, be of **minor adverse** significance, which is not significant.

21/00189/FUL Land north of Hill Rise, Woodstock, residential development of 180 dwellings

21/00127/OUT Land north of Banbury Road, Woodstock, residential development of 235 dwellings

16/01364/OUT Land east of Woodstock, residential development of 300 dwellings

Construction phase

7.11.15 These three areas of predominantly residential development are all located around the edge of Woodstock. One of these (16/01364/OUT Land east of Woodstock) has been consented and is currently under construction. A second one (21/00189 Land north of Hill Rise) has been consented but construction has not yet commenced. The third one (21/00127/OUT Land north of Banbury Road) has not yet been consented but is allocated for residential development in the local plan.

7.11.16 These three developments can all be seen as falling within the setting of the Blenheim Palace WHS, therefore there is the potential for cumulative impacts to occur. The contribution of the Project to any cumulative impacts would be time-limited and fully reversible.

7.11.17 Should there be any temporal overlap between the construction phase of the Project and the construction or operation of these three residential developments, the cumulative impact on the significance of the Blenheim Palace WHS would be no greater than for the Project when considered on its own.

Sensitivity/value of the receptor

7.11.18 The sensitivity/value of the Blenheim Palace WHS is **very high**.

Magnitude of impact

7.11.19 The magnitude of impact on the significance of the WHS is predicted to be **negligible adverse**. This impact would be time-limited and fully reversible.

Significance of the effect

7.11.20 Overall, the magnitude of the impact is **negligible adverse** and the sensitivity/value of the receptor is **very high**. The effect will, therefore, be of **minor adverse** significance, which is not significant.

Operation and maintenance phase

7.11.21 Should there be any temporal overlap between the operation and maintenance phase of the Project and the construction or operation of these three residential developments, the cumulative impact on the significance of the Blenheim Palace WHS would be no greater than for the Project when considered on its own.

Sensitivity/value of the receptor

7.11.22 The sensitivity/value of the Blenheim Palace WHS is **very high**.

Magnitude of impact

7.11.23 The magnitude of impact on the significance of the WHS is predicted to be **negligible adverse**. This impact would be time-limited and fully reversible.

Significance of the effect

7.11.24 Overall, the magnitude of the impact is **negligible adverse** and the sensitivity/value of the receptor is **very high**. The effect will, therefore, be of **minor adverse** significance, which is not significant.

Decommissioning phase

7.11.25 Should there be any temporal overlap between the decommissioning phase of the Project and the construction or operation of these three residential developments, the cumulative impact on the significance of the Blenheim Palace WHS would be no greater than for the Project when considered on its own. The residential developments are not expected to be decommissioned therefore there is no requirement to assess the potential cumulative effects that may occur during the decommissioning phase of the Project and the decommissioning phases of these developments.

Sensitivity/value of the receptor

7.11.26 The sensitivity/value of the Blenheim Palace WHS is **very high**.

Magnitude of impact

7.11.27 The magnitude of impact on the significance of the WHS is predicted to be **negligible adverse**. This impact would be time-limited and fully reversible.

Significance of the effect

7.11.28 Overall, the magnitude of the impact is **negligible adverse** and the sensitivity/value of the receptor is **very high**. The effect will, therefore, be of **minor adverse** significance, which is not significant.

21/03522/OUT West of Rutten Lane, Yarnton, residential development of up to 540 dwellings

20/01734/OUT Outline application for Salt Cross Garden Village – 2,200 dwellings and 40 ha. of employment land

22/01008/CCREG Eynsham Park and Ride and Science Transit

7.11.29 These projects are not within the setting of the Blenheim Palace WHS therefore there is no potential for cumulative effects.

Tier 2 projects

P22/V0144/SCR Red House Farm solar farm on c. 63.1 ha. of land

7.11.30 This project is not within the setting of the Blenheim Palace WHS therefore there is no potential for cumulative effects.

Tier 3 projects

Three of the Tier 3 projects identified above in **Table 7.16** are allocations for residential development set out in adopted local plans. Applications for such developments have been submitted in all three cases and are discussed above in the section regarding Tier 1 projects, therefore it is not necessary to provide any further assessment.

NGET Botley West substation

7.11.31 This project is not within the setting of the Blenheim Palace WHS therefore there is no potential for cumulative effects.

Harm to the significance of designated heritage assets as a result of change within their setting

Tier 1 projects

20/0187/FUL Land between Woodstock Sewage Works and B4027 – Blenheim Net Zero solar farm.

Construction Phase

7.11.32 This small solar farm may be located within the settings of some of the same designated heritage assets which also have visibility of the Project, specifically

the Rectangular Earthwork at Hensington Scheduled Monument (NHLE 1006357) and the two Grade II listed buildings at Shipton Slade Farm (NHLE 1210435; NHLE 1290435). If that is the case, then the Blenheim Net Zero solar farm would just appear to be part of the Project as it would be very similar in appearance and is directly adjacent to the Project.

7.11.33 Should there be any temporal overlap between the construction phase of the Project and the construction or operation and maintenance or decommissioning phases of the Blenheim New Zero solar farm, the cumulative impact on the significance of any designated heritage asset would be no greater than for the Project when considered on its own.

7.11.34 The detailed assessment of impacts and effects presented as Volume 3, Appendix 7.5: Settings Assessment of the ES found that the construction, operation and maintenance, and decommissioning of the Project would result in effects of **minor adverse** significance in respect of the Scheduled Monument and the two Grade II listed buildings. In all cases the effect would be long-term and fully reversible.

Sensitivity/value of the receptor

7.11.35 The sensitivity/value of the receptor is up to **high**.

Magnitude of impact

7.11.36 The assessed magnitude of impact is **negligible adverse**.

Significance of the effect

7.11.37 Overall, the magnitude of the adverse impact is **negligible adverse** and the sensitivity of the receptor is up to **high**. The effect will, therefore, be of **minor adverse** significance, which is not significant.

Operation and maintenance phase

7.11.38 Should there be any temporal overlap between the operation and maintenance phase of the Project and the construction or operation and maintenance or decommissioning phases of the Blenheim New Zero solar farm, the cumulative impact on the significance of any designated heritage asset would be no greater than for the Project when considered on its own.

7.11.39 The detailed assessment of impacts and effects presented as Volume 3, Appendix 7.5: Settings Assessment of the ES found that the construction, operation and maintenance, and decommissioning of the Project would result in effects of **minor adverse** significance in respect of the Scheduled Monument and the two Grade II listed buildings. In all cases the effect would be long-term and fully reversible.

Sensitivity/value of the receptor

7.11.40 The sensitivity/value of the receptor is up to **high**.

Magnitude of impact

7.11.41 The assessed magnitude of impact is **negligible adverse**.

Significance of the effect

7.11.42 Overall, the magnitude of the adverse impact is **negligible adverse** and the sensitivity of the receptor is up to **high**. The effect will, therefore, be of **minor adverse** significance, which is not significant.

Decommissioning phase

7.11.43 Should there be any temporal overlap between the decommissioning phase of the Project and the construction or operation and maintenance or decommissioning phases of the Blenheim New Zero solar farm, the cumulative impact on the significance of any designated heritage asset would be no greater than for the Project when considered on its own.

7.11.44 The detailed assessment of impacts and effects presented as Volume 3, Appendix 7.5: Settings Assessment of the ES found that the construction, operation and maintenance, and decommissioning of the Project would result in effects of **minor adverse** significance in respect of the Scheduled Monument and the two Grade II listed buildings. In all cases the effect would be long-term and fully reversible.

Sensitivity/value of the receptor

7.11.45 The sensitivity/value of the receptor is up to **high**.

Magnitude of impact

7.11.46 The assessed magnitude of impact is **negligible adverse**.

Significance of the effect

7.11.47 Overall, the magnitude of the adverse impact is **negligible adverse** and the sensitivity of the receptor is up to **high**. The effect will, therefore, be of **minor adverse** significance, which is not significant.

21/00189/FUL Land north of Hill Rise, Woodstock, residential development of 180 dwellings

21/00127/OUT Land north of Banbury Road, Woodstock, residential development of 235 dwellings

16/01364/OUT Land east of Woodstock, residential development of 300 dwellings

7.11.48 These residential developments are not located within the settings of any designated heritage assets which also have visibility of the Project; there is no potential for any cumulative effects.

21/03522/OUT West of Rutten Lane, Yarnton, residential development of up to 540 dwellings

Construction Phase

7.11.49 This residential development may be located within the settings of some of the same designated heritage assets which also have visibility of the Project, specifically the Grade II listed building known as Spring Hill (NHLE 1210367). The contribution of the Project to any cumulative impacts would almost

certainly be greater than the contribution of the residential development. This is due to the locations of the two schemes and the presence of existing vegetation which would largely screen the residential development in views from or across the listed building. However, the contribution of the Project would be time-limited and fully reversible, unlike the residential development.

7.11.50 Should there be any temporal overlap between the construction phase of the Project and the construction or operation of the residential development, the cumulative impact on the significance of the Grade II listed Spring Hill would be no greater than for the Project when considered on its own.

7.11.51 The detailed assessment of impacts and effects presented as Volume 3, Appendix 7.5: Settings Assessment of the ES found that the construction, operation and maintenance, and decommissioning of the Project would result in an effect of **minor adverse** significance in respect of the Grade II listed Spring Hill. The effect would be long-term and fully reversible.

Sensitivity/value of the receptor

7.11.52 The sensitivity/value of the receptor is **medium**.

Magnitude of impact

7.11.53 The assessed magnitude of impact is **negligible adverse**.

Significance of the effect

7.11.54 Overall, the magnitude of the adverse impact is **negligible adverse** and the sensitivity of the receptor is **medium**. The effect will, therefore, be of **minor adverse** significance, which is not significant.

Operation and maintenance phase

7.11.55 Should there be any temporal overlap between the operation and maintenance phase of the Project and the construction or operation of the residential development, the cumulative impact on the significance of any designated heritage asset would be no greater than for the Project when considered on its own.

7.11.56 The detailed assessment of impacts and effects presented as Volume 3, Appendix 7.5: Settings Assessment of the ES found that the construction, operation and maintenance, and decommissioning of the Project would result in an effect of **minor adverse** significance in respect of the Grade II listed building. The effect would be long-term and fully reversible.

Sensitivity/value of the receptor

7.11.57 The sensitivity/value of the receptor is **medium**.

Magnitude of impact

7.11.58 The assessed magnitude of impact is **negligible adverse**.

Significance of the effect

7.11.59 Overall, the magnitude of the adverse impact is **negligible adverse** and the sensitivity of the receptor is **medium**. The effect will, therefore, be of **minor adverse** significance, which is not significant.

Decommissioning phase

7.11.60 Should there be any temporal overlap between the decommissioning phase of the Project and the construction or operation of the residential development, the cumulative impact on the significance of any designated heritage asset would be no greater than for the Project when considered on its own.

7.11.61 The detailed assessment of impacts and effects presented as Volume 3, Appendix 7.5: Settings Assessment of the ES found that the construction, operation and maintenance, and decommissioning of the Project would result in an effect of **minor adverse** significance in respect of the Grade II listed building. The effect would be long-term and fully reversible.

Sensitivity/value of the receptor

7.11.62 The sensitivity/value of the receptor is **medium**.

Magnitude of impact

7.11.63 The assessed magnitude of impact is **negligible adverse**.

Significance of the effect

7.11.64 Overall, the magnitude of the adverse impact is **negligible adverse** and the sensitivity of the receptor is **medium**. The effect will, therefore, be of **minor adverse** significance, which is not significant.

20/01734/OUT Outline application for Salt Cross Garden Village – 2,200 dwellings and 40 ha. of employment land

22/01008/CCREG Eynsham Park and Ride and Science Transit

7.11.65 These two schemes are adjacent to each other, with the proposed garden village also being directly adjacent to the Site (immediately south west of the Central Site Area). The park and ride scheme has been consented and is under construction whilst the outline application for the garden village has not yet been determined although the land is allocated for this purpose in the West Oxfordshire Local Plan 2031.

7.11.66 These schemes may be located within the settings of some of the same designated heritage assets which have been assessed in respect of the Project, specifically the four Grade II listed buildings at City Farm (NHLE 1052428; NHLE 1198172; NHLE 1052429; NHLE 1198161).

7.11.67 The detailed assessment of impacts and effects presented as Volume 3, Appendix 7.5: Settings Assessment of the ES found that the construction, operation and maintenance, and decommissioning of the Project would result in no change within the setting of this group of Grade II listed buildings. Consequently, there would be no cumulative effects.

Tier 2 projects

P22/V0144/SCR Red House Farm solar farm on *c*. 63.1 ha. of land.

Construction phase

7.11.68 This proposed solar farm is located within the settings of some of the same designated heritage assets which also have visibility of the Project, specifically the Grade II listed Red House Farmhouse (NHLE 1048341). The proposed Red House Farm solar farm is located between the Grade II listed building and the Project, and if both solar farms were consented they would appear to be one larger scheme. The contribution made by the Red House Farm solar farm to any harm to the significance of the Grade II listed Red House Farmhouse may be slightly greater than the contribution made by the Project due to proximity, but this difference would be marginal. The contribution of both schemes would be time-limited and fully reversible.

7.11.69 Should there be any temporal overlap between the construction phase of the Project and the construction or operation and maintenance or decommissioning phases of the Red House Farm solar farm, the cumulative impact on the significance of the Grade II listed Red House Farmhouse would be greater than for the Project when considered on its own.

7.11.70 The detailed assessment of impacts and effects presented as Volume 3, Appendix 7.5: Settings Assessment of the ES found that the construction, operation and maintenance, and decommissioning of the Project would result in an effect of **negligible adverse** significance in respect of the Grade II listed building. The effect would be long-term and fully reversible.

Sensitivity/value of the receptor

7.11.71 The sensitivity/value of the receptor is **medium**.

Magnitude of impact

7.11.72 The assessed magnitude of impact is **low adverse**.

Significance of the effect

7.11.73 Overall, the magnitude of the adverse impact is **low adverse** and the sensitivity of the receptor is **medium**. The cumulative effect will, therefore, be of **minor adverse** significance, which is not significant.

Operation and maintenance phase

7.11.74 Should there be any temporal overlap between the operation and maintenance phase of the Project and the construction or operation and maintenance or decommissioning phases of the Red House Farm solar farm, the cumulative impact on the significance of the Grade II listed Red House Farmhouse would be greater than for the Project when considered on its own.

7.11.75 The detailed assessment of impacts and effects presented as Volume 3, Appendix 7.5: Settings Assessment of the ES found that the construction, operation and maintenance, and decommissioning of the Project would result in an effect of **negligible adverse** significance in respect of the Grade II listed building. The effect would be long-term and fully reversible.

Sensitivity/value of the receptor

7.11.76 The sensitivity/value of the receptor is **medium**.

Magnitude of impact

7.11.77 The assessed magnitude of impact is **low adverse**.

Significance of the effect

7.11.78 Overall, the magnitude of the adverse impact is **low adverse** and the sensitivity of the receptor is **medium**. The cumulative effect will, therefore, be of **minor adverse** significance, which is not significant.

Decommissioning phase

7.11.79 Should there be any temporal overlap between the decommissioning phase of the Project and the construction or operation and maintenance or decommissioning phases of the Red House Farm solar farm, the cumulative impact on the significance of the Grade II listed Red House Farmhouse would be greater than for the Project when considered on its own.

7.11.80 The detailed assessment of impacts and effects presented as Volume 3, Appendix 7.5: Settings Assessment of the ES found that the construction, operation and maintenance, and decommissioning of the Project would result in an effect of **negligible adverse** significance in respect of the Grade II listed building. The effect would be long-term and fully reversible.

Sensitivity/value of the receptor

7.11.81 The sensitivity/value of the receptor is **medium**.

Magnitude of impact

7.11.82 The assessed magnitude of impact is **low adverse**.

Significance of the effect

7.11.83 Overall, the magnitude of the adverse impact is **low adverse** and the sensitivity of the receptor is **medium**. The cumulative effect will, therefore, be of **minor adverse** significance, which is not significant.

Tier 3 projects

7.11.84 Three of the Tier 3 projects identified above in **Table 7.16** are allocations for residential development set out in adopted local plans. Applications for such developments have been submitted in all three cases and are discussed above in the section regarding Tier 1 projects, therefore it is not necessary to provide any further assessment.

NGET Botley West substation (if located outside the Order Limits for the Project)

7.11.85 The potential alternative location for the NGET Botley West substation is directly adjacent to the Order Limits for the Project and is within the settings of some of the same designated heritage assets which also have visibility of the Project, specifically the Grade II listed Red House Farmhouse (NHLE 1048341). However, the distance between the designated heritage assets and

the potential alternative location for the NGET Botley West substation is such that the cumulative impact on the significance of the Grade II listed Red House Farmhouse would be no greater than for the Project when considered on its own.

Harm to the character of the historic landscape

7.11.86 The historic landscape is a receptor that covers the whole of the Site and the wider area, including all of the land impacted by the schemes considered within the CEA (across all three Tiers). None of the schemes considered within the CEA would directly impact land that has a historic character type considered rare or very rare within the county.

7.11.87 Although there is potential for cumulative impacts on the character of the historic landscape to occur with regard to all of the schemes considered within the CEA, the overall magnitude of impact and level of effect would remain the same as for the Project when considered on its own. This is because all of the other schemes are relatively small in comparison, although in most cases the impacts of the other schemes are not time-limited and reversible as they are for the Project. The other schemes may also require removal of elements of the historic landscape such as field boundaries, which is not the case for the Project.

7.12 Transboundary effects

7.12.1 As per the Scoping Report, it was concluded that the Project is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State (EEA state) and therefore a transboundary assessment is not proposed in the ES.

7.13 Inter-related effects

7.13.1 Inter-relationships are the impacts and associated effects of different aspects of the Project on the same receptor. These are as follows.

- Project lifetime effects: Assessment of the scope for effects that occur throughout more than one phase of the Project (construction, operation and maintenance, and decommissioning), to interact to potentially create a more significant effect on a receptor than if just assessed in isolation in these three phases (e.g., construction noise effects from piling, operational substation noise, and decommissioning disturbance).
- Receptor-led effects: Assessment of the scope for all effects (including inter-relationships between environmental topics) to interact, spatially and temporally, to create inter-related effects on a receptor. As an example, all effects on the historic environment, such as loss of vegetation etc., may interact to produce a different, or greater effect on this receptor than when the effects are considered in isolation. Receptor-led effects may be short term, temporary or transient effects, or incorporate longer term effects.

7.13.2 A description of the likely inter-related effects arising from the Project on the historic environment is provided in Volume 1, Chapter 20: Cumulative Effects and Inter-relationships of the ES **[EN010147/APP/6.3]**.

7.13.3 No project lifetime effects are predicted to arise with regard to historic environment receptors. **Table 7.18** lists the receptor-led inter-related effects that are predicted to arise for historic environment receptors.

Table 7.18: Summary of likely significant inter-related effects

Description of impact	Phase[a] C	O	D	Likely significant inter-related effects	Significance
Receptor-led effects					
Loss of vegetation to facilitate access for construction, maintenance and decommissioning	✓	✓	✓	The removal of short sections of hedgerow at key access points (approximately 706 metres of loss) could lead to increased visibility of elements of the Project and therefore changes within the settings of designated heritage assets and the character of the historic landscape, as well as effects relating to landscape and visual impacts and ecology.	Negligible adverse

[a] C=construction, O=operational and maintenance, D=decommissioning

7.14 Summary of impacts, mitigation measures and monitoring

7.14.1 Information on the historic environment within the study areas was collected through desk-based assessment, site visits and geophysical surveys.

7.14.2 **Table 7.1919** presents a summary of the potential impacts, measures adopted as part of the Project and residual effects in respect to the historic environment. The impacts assessed include:

- Loss of, or harm to, significant buried archaeological remains;
- Loss of, or harm to, less significant buried archaeological remains;
- Harm to the significance of the Blenheim Palace WHS as a result of change within its setting;
- Harm to the significance of designated heritage assets as a result of change within their setting; and
- Harm to the character of the historic landscape.

7.14.3 Overall, it is concluded that there will be no significant effects arising from the Project during the construction, operation and maintenance or decommissioning phases.

7.14.4 **Table 7.19** presents a summary of the potential cumulative impacts, mitigation measures and residual effects. The cumulative impacts assessed include:

- Harm to the significance of the Blenheim Palace WHS as a result of change within its setting;
- Harm to the significance of designated heritage assets as a result of change within their setting; and

- Harm to the character of the historic landscape.

7.14.5 Overall, it is concluded that there will be no significant cumulative effects from the Project alongside other projects/plans.

7.14.6 No potential transboundary impacts have been identified in regard to effects of the Project.

Table 7.19: Summary of potential environmental effects, mitigation and monitoring.

Description of impact	Phase C	Phase O	Phase D	Magnitude of impact	Sensitivity of the receptor	Significance of effect	Further mitigation	Residual effect	Proposed monitoring
Loss of, or harm to, significant buried archaeological remains	✓	✓	✓	C: Low adverse O: Low beneficial D: No change	C: High O: High D: High	C: Minor adverse O: Minor beneficial D: No change	n/a	C: Minor adverse O: Minor beneficial D: No change	C: None O: None D: None
Loss of, or harm to, less significant buried archaeological remains	✓	✓	✓	C: Low adverse O: Low beneficial D: No change	C: Low O: Low D: Low	C: Minor adverse O: Minor beneficial D: No change	n/a	C: Minor adverse O: Minor beneficial D: No change	C: None O: None D: None
Harm to the significance of the Blenheim Place World Heritage Site as a result of change within its setting	✓	✓	✓	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: Very high O: Very high D: Very high	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None
Harm to the significance of designated heritage assets as a result of change within their setting	✓	✓	✓	C: Low adverse O: Low adverse D: Low adverse	C: Very high O: Very high D: Very high	C: Minor adverse O: Minor adverse D: Minor adverse		C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None
Harm to the significance of the Sansom's Platt Roman Villa Scheduled Monument	✓	✓	✓	C: Negligible adverse O: Negligible adverse	C: High O: High D: High	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse O: Minor adverse	C: None O: None D: None

Description of impact	Phase C	Phase O	Phase D	Magnitude of impact	Sensitivity of the receptor	Significance of effect	Further mitigation	Residual effect	Proposed monitoring
as a result of change within its setting				D: Negligible adverse				D: Minor adverse	
Harm to the significance of the rectangular earthwork, Hensington Scheduled Monument as a result of change within its setting	✓	✓	✓	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: High O: High D: High	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None
Harm to the significance of the Blenheim Villa and associated field system Scheduled Monument as a result of change within its setting	✓	✓	✓	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: High O: High D: High	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None
Harm to the significance of the Blenheim Palace Grade I Registered Park and Garden as a result of change within its setting	✓	✓	✓	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: Very High O: Very High D: Very High	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None
Harm to the significance of the Church of St Peter and St Paul, Church Hanborough Grade I listed building as a result of change within its setting	✓	✓	✓	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: High O: High D: High	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None

Description of impact	Phase C	Phase O	Phase D	Magnitude of impact	Sensitivity of the receptor	Significance of effect	Further mitigation	Residual effect	Proposed monitoring
Harm to the significance of the Church of St Peter Cassington Grade I listed building as a result of change within its setting	✓	✓	✓	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: High O: High D: High	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None
Harm to the significance of Hordley House, Wootton, Grade II* listed building as a result of change within its setting	✓	✓	✓	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: High O: High D: High	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None
Harm to the significance of the Church of St Michael, Begbroke, Grade II* listed building as a result of change within its setting	✓	✓	✓	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: High O: High D: High	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None
Harm to the significance of Swinford Bridge, Oxford Road, Grade II* listed building as a result of change within its setting	✓	✓	✓	C: No change O: No change D: No change	C: High O: High D: High	C: No change O: No change D: No change	n/a	C: No change O: No change D: No change	C: None O: None D: None
Harm to the significance of four Grade II listed buildings at Lower	✓	✓	✓	C: Negligible adverse	C: Medium O: Medium D: Medium	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse	C: None O: None D: None

Description of impact	Phase C	Phase O	Phase D	Magnitude of impact	Sensitivity of the receptor	Significance of effect	Further mitigation	Residual effect	Proposed monitoring
Dornford Farm as a result of change within their setting				O: Negligible adverse D: Negligible adverse				O: Minor adverse D: Minor adverse	
Harm to the significance of two Grade II listed buildings at Shipton Slade Farm as a result of change within their setting	✓	✓	✓	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: Medium O: Medium D: Medium	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None
Harm to the significance of the Column of Victory, Blenheim Park, Grade II listed building as a result of change within its setting	✓	✓	✓	C: No change O: No change D: No change	C: Very High O: Very High D: Very High	C: No change O: No change D: No change	n/a	C: No change O: No change D: No change	C: None O: None D: None
Harm to the significance of the Church of St Martin, Bladon, Grade II listed building as a result of change within its setting	✓	✓	✓	C: No change O: No change D: No change	C: Very High O: Very High D: Very High	C: No change O: No change D: No change	n/a	C: No change O: No change D: No change	C: None O: None D: None
Harm to the significance of Spring Hill, Yarnton, Grade II listed building as a result of change within its setting	✓	✓	✓	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: Medium O: Medium D: Medium	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None

Description of impact	Phase C	Phase O	Phase D	Magnitude of impact	Sensitivity of the receptor	Significance of effect	Further mitigation	Residual effect	Proposed monitoring
Harm to the significance of Burleigh Farmhouse, Grade II listed building as a result of change within its setting	✓	✓	✓	C: Low adverse O: Low adverse D: Low adverse	C: Medium O: Medium D: Medium	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None
Harm to the significance of Mill Farmhouse and attached mill building, Grade II listed building as a result of change within its setting	✓	✓	✓	C: Low adverse O: Low adverse D: Low adverse	C: Medium O: Medium D: Medium	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None
Harm to the significance of Dunbar (New Farm Farmhouse), Grade II listed building as a result of change within its setting	✓	✓	✓	C: Low adverse O: Low adverse D: Low adverse	C: Medium O: Medium D: Medium	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None
Harm to the significance of a group of four Grade II listed buildings at City Farm, Eynsham, as a result of change within their setting	✓	✓	✓	C: No change O: No change D: No change	C: Medium O: Medium D: Medium	C: No change O: No change D: No change	n/a	C: No change O: No change D: No change	C: None O: None D: None
Harm to the significance of Eynsham Mill, Mill Lane, Grade II listed	✓	✓	✓	C: No change O: No change D: No change	C: Medium O: Medium D: Medium	C: No change O: No change D: No change	n/a	C: No change O: No change D: No change	C: None O: None D: None

Description of impact	Phase C	Phase O	Phase D	Magnitude of impact	Sensitivity of the receptor	Significance of effect	Further mitigation	Residual effect	Proposed monitoring
building as a result of change within its setting									
Harm to the significance of Toll Gate House attached to Swinford Bridge, Grade II listed building as a result of change within its setting	✓	✓	✓	C: No change O: No change D: No change	C: Medium O: Medium D: Medium	C: No change O: No change D: No change	n/a	C: No change O: No change D: No change	C: None O: None D: None
Harm to the significance of milestone at NGR SP 4468 0725, Oxford Road, Grade II listed building as a result of change within its setting	✓	✓	✓	C: Low adverse O: Low adverse D: Low adverse	C: Medium O: Medium D: Medium	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None
Harm to the significance of Red House Farmhouse, Eynsham Road, Grade II listed building as a result of change within its setting	✓	✓	✓	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: Medium O: Medium D: Medium	C: Negligible adverse O: Negligible adverse D: Negligible adverse	n/a	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: None O: None D: None
Harm to the significance of Upper Whitely Farmhouse, Grade II listed building as a result of change within its setting	✓	✓	✓	C: No change O: No change D: No change	C: Medium O: Medium D: Medium	C: No change O: No change D: No change	n/a	C: No change O: No change D: No change	C: None O: None D: None

Description of impact	Phase C	Phase O	Phase D	Magnitude of impact	Sensitivity of the receptor	Significance of effect	Further mitigation	Residual effect	Proposed monitoring
Harm to the significance of Wootton Conservation Area as a result of change within its setting	✓	✓	✓	C: Low adverse O: Low adverse D: Low adverse	C: Medium O: Medium D: Medium	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None
Harm to the significance of Bladon Conservation Area as a result of change within its setting	✓	✓	✓	C: Low adverse O: Low adverse D: Low adverse	C: Medium O: Medium D: Medium	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None
Harm to the significance of Begbroke Conservation Area as a result of change within its setting	✓	✓	✓	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: Medium O: Medium D: Medium	C: Negligible adverse O: Negligible adverse D: Negligible adverse	n/a	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: None O: None D: None
Harm to the significance of Church Hanborough Conservation Area as a result of change within its setting	✓	✓	✓	C: Low adverse O: Low adverse D: Low adverse	C: Medium O: Medium D: Medium	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None
Harm to the significance of the non-designated Tumbledown Cottage	✓	✓	✓	C: Low adverse O: Low adverse D: Low adverse	C: Low O: Low D: Low	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None

Description of impact	Phase C O D	Magnitude of impact	Sensitivity of the receptor	Significance of effect	Further mitigation	Residual effect	Proposed monitoring
as a result of change within its setting						D: Minor adverse	
Harm to the character of the historic landscape	✓ ✓ ✓	C: Low adverse O: Low adverse D: Low adverse	C: Medium O: Medium D: Medium	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	C: Minor adverse O: Minor adverse D: Minor adverse	C: None O: None D: None

[a] C=construction, O=operational and maintenance, D=decommissioning

Table 7.20: Summary of potential cumulative environmental effects, mitigation and monitoring.

Description of effect	Phase C O D	Magnitude of impact	Sensitivity of the receptor	Significance of effect	Further mitigation	Residual effect	Proposed monitoring
Tier 1							
Harm to the significance of the Blenheim Place World Heritage Site as a result of change within its setting	✓ ✓ ✓	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: Very high O: Very high D: Very high	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	n/a	C: None O: None D: None
Harm to the significance of designated heritage assets as a result of change within their setting	✓ ✓ ✓	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: High O: High D: High	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	n/a	C: None O: None D: None

Description of effect	Phase C	Phase O	Phase D	Magnitude of impact	Sensitivity of the receptor	Significance of effect	Further mitigation	Residual effect	Proposed monitoring
Harm to the character of the historic landscape	✓	✓	✓	C: Medium adverse O: Medium adverse D: Low adverse	C: Low O: Low D: Low	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	n/a	C: None O: None D: None
Tier 2									
Harm to the significance of designated heritage assets as a result of change within their setting	✓	✓	✓	C: Negligible adverse O: Negligible adverse D: Negligible adverse	C: High O: High D: High	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	n/a	C: None O: None D: None
Harm to the character of the historic landscape				C: Medium adverse O: Medium adverse D: Low adverse	C: Low O: Low D: Low	C: Minor adverse O: Minor adverse D: Minor adverse	n/a	n/a	C: None O: None D: None

[a] C=construction, O=operational and maintenance, D=decommissioning

7.15 References

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