

WEST OXFORDSHIRE DISTRICT COUNCIL
ECONOMIC AND SOCIAL OVERVIEW & SCRUTINY COMMITTEE
THURSDAY 19 JANUARY 2017
BLENHEIM PALACE WORLD HERITAGE SITE – REVISED MANAGEMENT PLAN
2017-2027
REPORT OF THE STRATEGIC DIRECTOR
(Contact: Janice Bamsey, Tel: (01993) 861654)

(The decisions on this matter will be resolutions)

1. PURPOSE

To review the revised Blenheim Palace World Heritage Site Management Plan and submit consultation comments to Historic Landscape Management by 20 January 2017.

2. RECOMMENDATION

That, subject to further comments and any amendments from Members, the comments set out in Appendix 2 of this report are submitted to Historic Landscape Management in response to the consultation on the revised Blenheim Palace World Heritage Site Management Plan.

3. BACKGROUND

- 3.1. In 1987 Blenheim Palace and its landscaped park was identified by UNESCO as a place 'of outstanding universal value to the whole of humanity', such that it was 'designated' a World Heritage Site.
- 3.2. A Management Plan for the Blenheim Palace World Heritage Site (WHS) was first published in July 2006. This was the first time a management plan had combined the dual aims of protection of both a national and a world heritage site. The Plan's vision for the future of the historic, scenic, scientific, cultural and social qualities of the Site, together with a set of management objectives and an implementation plan, were agreed through a Steering Group (which included representatives from the Department of Culture, Media and Sport, Historic England, Natural England, ICOMOS UK [International Conference on Monuments and Sites UK], Oxfordshire County Council, West Oxfordshire District Council and Blenheim Palace).
- 3.3. The purpose of the Management Plan is to sustain and conserve the Outstanding Universal Values (OUV) which make Blenheim internationally and nationally important, as well as conserving national and local values. It provides guidance for the site's protection and management. A management plan for each WHS is now a requirement by UNESCO.
- 3.4. In terms of planning, World Heritage Sites are designated heritage assets of the highest importance. Policy EH7 in the Draft West Oxfordshire Local Plan 2031 sets out the Council's planning approach to the District's historic environment. Policy EW1 relates specifically to the Blenheim World Heritage Site. In line with the National Planning Policy Framework, the OUV of the Blenheim Palace WHS, its setting, integrity and authenticity, will be protected, conserved and enhanced and its sustainable use

promoted. In both policies, specific reference is given to the aims, objectives and guidance of the WHS Management Plan; the Management Plan is identified as a material consideration in assessing proposals.

4. REVISED MANAGEMENT PLAN

- 4.1. The Management Plan is monitored on an annual basis by the Steering Group. The Group is coordinated by the Blenheim Palace and Estate Chief Executive who has responsibility for implementing the Management Plan Action Plan. There is an on-going programme of repair and regular maintenance of the buildings and structures. However, as the current Management Plan has been in operation for 10 years, it was considered appropriate to: undertake a more detailed assessment of the Plan's achievements and vision; update the Plan in light of current and emerging issues and current levels of understanding; and update the Action Plan to reflect the priorities over the next 10 years.
- 4.2. During October 2016 consultation was undertaken on a scoping document to help inform the basis of the review and the proposed content of the revised plan. Key stakeholders and the public were given the opportunity to comment. The Council's Blenheim Palace World Heritage Site Management Plan Working Party submitted comments in November. These are attached at Appendix I.
- 4.3. It should be emphasised that the work on the Management Plan is in the form of a review, not a complete re-write of a new plan. Much of the content of the review document, where updating is not required, is, therefore, a repeat of the original plan and is unlikely to need further comment.
- 4.4. The following is a summary of the review document structure. The key areas of change are identified in *italics*; our consultation response will mainly focus on these elements of the plan.

Section One – Understanding and Background

This section provides the background information which is necessary in helping to develop an understanding of the Blenheim Palace and Park WHS. It explains the need for the document, sets out the achievements of the last 10 years and provides a general overview of historic development as well as the current state of conservation and condition.

Chapters 1 - 3 are mainly background and are largely unchanged, with minor, factual updating where necessary. Chapter 4 has been changed the most change since it records the character and condition of the various areas within the site as they are now, rather than 10 years ago but, again, these are mainly factual updates.

Section Two – Significances, Challenges and Opportunities

Chapter 5 addresses 'integrity and authenticity' and includes an explanation of the OUV attributes. These issues will be of special relevance and interest to ICOMOS UK.

Chapter 6 sets out the statements of significance and the national, regional and local values of the site; this remains unchanged from the first plan.

Chapter 7 on the Challenges and Opportunities which are likely to arise in the coming 10 years is one of the main parts of the Plan to be updated.

Section Three – Vision and Management Objectives

Chapter 8 – 10, covering the vision, objectives, monitoring and review, are largely unchanged from the last plan.

Section Four - Implementation

Chapter 11 sets out the Action Plan with the short, medium and long term goals. This section contains the main changes to the document.

Appendices

The appendices contain background information. Appendix 1 sets out a series of maps. Figure 5 'Character of the Setting' is particularly relevant to the Local Plan process as Proposed Modification MAIN 181 intends for the original Management Plan setting map to be included within the Local Plan; Figure 5 amends the original.

Challenges and Opportunities

Enjoying the World Heritage Site

- 4.5. In identifying the challenges to be addressed by the Management Plan over the next ten years, use is made of a Periodic Reporting exercise for the Blenheim Palace WHS undertaken in 2014. While the conclusion of the exercise was that the site's authenticity has been preserved, the integrity is intact and the OUV has been maintained, 7 negative factors were identified – see table. (insert table from CD)
- 4.6. The table identifies that the most significant potentially negative factor that has the potential to impact on the OUV of the WHS is that caused by tourism and recreation, with the associated ground transport impacts being minor but increasing.
- 4.7. The Plan identifies the need for careful management of visitor numbers to ensure that the values of the site are not damaged and impacts on local residents are minimised. This is to be done through:
 - Continuing with the new approach to the management of the events calendar which aims to spread activities across the whole year and across the site, balancing large and small events in order to manage the physical impacts on the fabric
 - In line with this, looking at ways of encouraging visitors to see more of the park, through improved interpretation and education, thus also spreading the use across the whole site
 - Continuing to monitor the traffic and transport plans for major events, including car parking needs and be alert to the needs of any change should this be required. Setting up further links to public transport networks, particularly in relation to offering combined transport and entry ticket offers, provide an alternative to the car.

Officer comment

- 4.8. Without measures in place to minimise impact of events on both the WHS and the surrounding area, spreading the events throughout the year could result in even greater impacts, just spread over a longer timescale, with no periods of 'quiet' and/or opportunities for 'recuperation', especially of sensitive habitats. At certain times of the year the impacts may be felt more; for example winter events in wet weather may mean greater damage to ground condition and soil structure, with implications for surface water drainage/flooding, soil compaction and robustness of trees and

vegetation. Winter events can also be more visually intrusive as a result of leaf loss within park boundary belts.

- 4.9. Similarly, spreading visitors throughout the site will need to be done with care. Certain areas will be sensitive to disturbance. The more isolated parts of the site will be some distance from the supporting facilities, such as WCs, which may necessitate investment in further infrastructure.
- 4.10. It is good to see that recognition is given to these issues elsewhere within the Management Plan, especially under consideration of 'environmental sustainability', but it would be useful if reference was also made within the 'challenges' section.
- 4.11. It is also good to see explicit reference given to the traffic issues associated with Blenheim. However, despite these issues being translated into 'objectives' (Objectives 23-27) and associated 'actions', there is little discussion about the possible solutions, for example, the inclusion of an active traffic management/parking strategy which could, for instance, give an assessment of the recent use of a park and ride scheme at Oxford Airport.
- 4.12. It should be noted, with the level of events having increased over the years and the intention to spread these events further, planning permission is likely to be required. The need to authorise this new approach to events should be brought to the attention of Blenheim Palace.

The Historic Parkland

- 4.13. Over the past 3 years the conservation and management of the park has been improved. The most significant task still to be undertaken is the conservation of Queen Pool which is suffering from silt deposition. The Management Plan makes clear that the issues in relation to the Pool are complex, covering designed landscape, ecology, water and visitor management, as well as economics to overcome before any works can take place.

Officer comment

- 4.14. A study into the possible causes of siltation has recently been undertaken which has included a study of upstream discharge into the Glyme as well as a survey of adjacent land use, together with a water chemistry study of the lake and up and downstream areas. It is important that the findings of this study are fully assessed prior to any plans to de-silt the Pool, particularly as this area is part of the Blenheim Park SSSI.

Development within the World Heritage Site

- 4.15. The Management Plan states that in order to protect the OUV of the parkland landscape it will be important to:
 - Continue to protect and conserve the vernacular characteristics of the cottage properties
 - Restore or find new, appropriate, uses for any unused historic structures in a way that respects the parkland setting. This would be in line with national good conservation practice which recognises that a building is best conserved when it has a use
 - Ensure that any modern buildings do not detract from the historic character and remove any detractors that reach the end of their useful life

Officer comment

- 4.16. This approach is generally acceptable and it must be remembered that the Management Plan does not affect the statutory obligations and considerations of the local planning authority. Clarification would, however, be useful in relation to the last bullet point as it is not clear as to whether this relates to existing modern buildings or to proposed new build. For existing modern buildings the bullet point would benefit with 'existing' before 'modern'. For new build, given the heritage significance of the site, simply not detracting from the area's character is not good enough. Where new development is appropriate in principle, a high quality of design will be required and the landscape and historic character of the area enhanced.

Implementation - Action Plan

- 4.17. The Implementation Plan sets out recommended actions to address the issues and objectives identified earlier within the Management Plan.
- 4.18. **Objective 4** identifies the need for a unified approach by all statutory bodies making decisions that may affect the WHS.

Officer comment

- 4.19. This objective is supported but it is also important that those responsible for managing the WHS recognise the need to also give consideration to the wider context of the site and the responsibilities of the statutory bodies. For example, the need to give consideration to the setting of the Cotswolds Area of Outstanding Natural Beauty and the Conservation Area and the opportunities of the Conservation Target Areas.
- 4.20. One of the actions associated with **Objective 6** (which calls for the continued identification and monitoring of potential risks and threats to the WHS) is to monitor the effects of climate change, particularly in relation to landscape planting.

Officer comment

- 4.21. It is also important to consider the risk associated with the effects of climate change on the hydrological system within and surrounding the WHS, including the impacts of flooding and drought. This may be especially relevant to the future management of Queen Pool.
- 4.22. **Objective 10** relates to the West Oxfordshire Local Plan and the need for policies within it to protect the WHS and for the Management Plan to be a material planning consideration.

Officer comment

- 4.23. The draft West Oxfordshire Local Plan 2031 does contain policies to protect the WHS and its setting. The Management Plan is identified as a material planning consideration. Blenheim have, however, made representations on the Proposed Modifications to the Local Plan and these will be considered by an independent Inspector at the Examination in Public later this year.
- 4.24. For added clarity, the actual wording of Objective 10 should be amended, firstly, to follow the same format as the other objectives and, secondly, to re-phrase the second part of the objective which is confusing.
- 4.25. **Objective 16** says that consideration should be given to reducing the impact of game management practices where they may affect the international significance of the site.

Officer comment

- 4.26. A more appropriate objective than 'giving consideration to' would be 'reducing the impact'. This objective would then read: 'Reduce the impact where possible of game management practises where they affect international significance of both the designed historic landscape and the ancient woodland in High Park.'
- 4.27. **Objectives 20-22** relate to conserving the natural heritage.

Officer comment

- 4.28. These objectives and actions are supported but it is disappointing that the emphasis tends to be on maintaining and protecting the existing situation, rather than also enhancing the natural heritage. Two Conservation Target Areas, the Glyme and Dorn CTA and the Blenheim and Ditchley Parks CTA, cover much of the WHS; CTAs aim to restore biodiversity at a landscape-scale through the maintenance, restoration and creation of BAP priority habitats.
- 4.29. **Objective 25** relates to public rights of way and refers to promoting 'all types of visitor access to the heritage property as widely as possible, at a local, national and international level.'

Officer comment

- 4.30. It is not clear what is meant by 'all types of visitor access'. Clarification is needed.

Appendices

- 4.31. The appendices provide background data and information on a range of topics, such as the consultation exercise, national heritage undertakings and a study of setting. There are also a series of maps, showing such items as WHS boundary, location, public access, character of setting and location of key features.

Officer comment

- 4.32. One of the most relevant maps in the appendix to the Management Plan is Figure 5 which depicts the character of the setting of the WHS. It is proposed that the equivalent figure in the current Management Plan will be included in the Local Plan. It would be appropriate for the version in the new Management Plan to be included instead, as a minor update to the Local Plan.
- 4.33. It should be noted, however, that Figure 5 has been revised, with amendments to some of the designations. One of the main changes relates to land between the railway line and Long Hanborough which currently is within a zone 'where significant, tall or prominent development would affect the setting' of the WHS. The new designation, covering a larger area, is 'agricultural land which, due to its landform, significantly contributes to the setting of the World Heritage Site'.
- 4.34. This revision is supported in principle. There is one field immediately to the north of Long Hanborough which has been excluded. While part of this field lies to the rear of a house in a large landscaped garden which acts as a buffer to the views from the WHS, the remaining part of the field contributes to the agricultural setting and should be included in the designation.
- 4.35. There is also a revision to the extent of one of the 'Areas that are Significant to the Visual Setting of Blenheim'. Land south of Manor Road/west of Heath Lane has been excluded.

- 4.36. Land in the Combe area designated as 'Areas of intervisibility' has been amended: in some areas extended and, within the village, reduced.
- 4.37. Before Figure 5 is included in the Local Plan there needs to be a clear justification for the changes to the boundaries of the various character settings.
- 4.38. Some minor comments on the appendices, mainly related to omissions and typos, are included in Appendix 2 to this report.

Other

- 4.39. Appendix 2 also includes minor comments in relation to other parts of the Management Plan. Two issues to be highlighted, for information, relate to buffer zones and financial context.
- 4.40. Paragraphs 2.07-2.21 of the Plan explain about the setting of the World Heritage Site and its protection. Explicit reference is made to the consideration of a buffer zone, with the conclusion that, given the very high degree of protection for the attributes that help convey the OUV of the site, the designation of a buffer zone is unnecessary. This accords with the assessment made by Economic and Social Overview and Scrutiny Committee in November 2016.
- 4.41. Paragraph 2.31 sets out the financial context for the WHS, explaining that most of the operating income comes from: visitors; bottled water business; in-house farming; income from agriculture and from residential and commercial let properties; fishing and shooting. It should be noted that much of this income is from the wider Estate, outside of the WHS. The conclusion is that major conservation projects are likely to be reliant on Estate activities, as well as additional funding from external sources. The Plan does not make any reference to the sale of Estate land for housing development.
- 4.42. Appendix 2 brings together all the officer comments made in this report, together with minor comments.

5. ALTERNATIVES/OPTIONS

The Committee could decide that the comments on the Management Plan are such that its endorsement will not take place until the final version of the Plan has been seen.

6. FINANCIAL IMPLICATIONS

There are no direct financial implications associated with this matter.

7. RISKS

None

8. REASONS

Not applicable.

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Date: 6 January 2017

Background Papers:

Blenheim Palace World Heritage Site Management Plan Working Party: 'Draft response to consultation on the Blenheim Palace World Heritage Site Management Plan', 31 October 2016.

Economic and Social Overview and Scrutiny Committee: 'Blenheim Palace World Heritage Site', 24 November 2016.

West Oxfordshire District Council, Blenheim Palace World Heritage Site Management Plan Working Party

Response to consultation on the Blenheim Palace WHS Management Plan

The District Council welcomes the opportunity to be involved in and influence the review and update of the Blenheim Palace WHS Management Plan.

The Members of the WHS Working Party appreciated the opportunity to be taken around the site by Roy Cox and to be introduced to some of the management issues. They were impressed by Roy's in-depth knowledge of the WHS and grateful for his fund of information. The site is impressive in the innovations for present and future visitors' experiences and the concern for retaining the quality of the heritage.

The document that has begun this review process provides a good overview of what makes this site special, not just locally but nationally and internationally. Some of the key challenges and possible priorities for action are identified. However, some of the potentially more contentious aspects will be in the detail/implementation of these broader issues. Adding the further detail at this stage would provide useful clarity. For example, in providing transparency in the financing and funding of projects and having a clear approach to 'enabling development'.

In terms of specific issues raised, Members are keen that the problems of silt in **Queen's Pool**, and the need for dredging, should be given urgent priority.

They also express their concern for the state of the buildings at **Furze Platt** and suggest that this area should be brought out more specifically as an item which needs immediate attention with a list of possible uses included, recognising its location next to the Oxfordshire Way and its potential as a source of revenue for the estate.

With regard to the wider context of the WHS, the issue of **traffic management and access-related issues and opportunities** are especially important to consider, both inside and outside the site. The County Council's emerging plans for a park and ride at Oxford airport and whether better linkages can be promoted with Hanborough station (e.g. minibus/signed walking route) are examples of these wider considerations. So too are traffic implications of major events at the Palace. While there do appear to have been important lessons learnt (such as through the most recent CLA Games Fairs) concern is expressed that these lessons do not seem to be embedded in the organisation of other events. While accepting that there are other mechanisms that can influence and control traffic, such as through licensing, the Management Plan should recognise that it too has a role to play in addressing this issue, not least in assessing the impact upon the heritage asset.

Information for visitors around the Park. If it is the intention to increasingly disperse visitors throughout the WHS, the implications of the internal management of this approach will need to be

assessed (e.g. interpretation and directional signs, distance from facilities meaning there may be new facilities, such as toilets and seating). Members of the Working Party are particularly keen that the site's interpretation should offer a better reflection of the total history of the area, for example with information on the period pre-dating the construction of Blenheim Palace, such as discretely placed noticeboards indicating the site of Woodstock Palace, the Royal Hunting Lodge and the Manor and the creation of historic trails to promote wider access to more remote areas of the estate.

Planning. The Council fully supports the idea of considering both the WHS and its setting. This accords with the approach to other heritage assets. A clear explanation as to the justification for the use of a buffer zone, or not, would be useful.

The existing Management Plan contains 'zones of visual significance'. These have been useful and their review, but retention, should be considered. (It is proposed that they will be included within the West Oxfordshire Local Plan 2031. For the full proposed section on the Blenheim Palace World Heritage Site, please see for your information the attached appendix containing an extract from the document, on which public consultation will begin during the week commencing 7 November 2016.)

Looking at the setting and zone of influence of the WHS should mean that the WHS is not considered in isolation but as part of a wider context. This will connect well with the ideas of river catchments, Green Infrastructure and wider farming, historic and landscape context, increasingly advocated by Government.

Relationship with local communities. Whilst acknowledging the positive contribution made by the estate, the Working Party emphasise the importance of exhibiting greater sensitivity to local views and maintaining a constructive relationship with local communities, especially at a time when many residents feel 'under threat' by house-building proposals.

JB 01/11/16

West Oxfordshire District Council comments on the working consultation draft of the Blenheim Palace World Heritage Site Revised Management Plan 2017-2027

Paragraph/page number	Comment
2.06,p8 Local Landscape Character Assessment	Welcome the reference to WODC's Landscape Assessment but it would also be useful to refer to the Cotswolds Area of Outstanding Natural Beauty Landscape Character Assessment, Strategy and Guidelines, the Oxfordshire Wildlife and Landscape Study and the Historic Landscape Assessment for Oxfordshire.
2.07-2.21, p8-9 WHS setting	Good to see explicit reference made to the consideration of a buffer zone. The conclusion that the designation of a buffer zone is unnecessary accords with the assessment made by Economic and Social Overview and Scrutiny Committee in November 2016.
2.11, p9 WHS setting	Replace '...new core strategies...' with '...new local plans...'
2.12, p10 Landscape designations and heritage features	Add reference to the work currently underway on the Historic Landscape Assessment for Oxfordshire.
2.15, p11 Nature conservation	Reference to the Oxfordshire Biodiversity Action Plan is probably best changed to Conservation Target Areas. (Take advice from Natural England.)
2.31, p15-16 Financial resources	The Plan does not make any reference to the sale of Estate land for housing development. Was this a conscious decision in order to avoid a controversial issue?
5.04, p52 Inscription	As this statement is part of the inscription, can it now not be changed even though it is out of date? PPS5 and Circular 07/09 have been withdrawn. The NPPF, Planning Practice Guidance and Historic England guidance is now used.
7.08, p61 Objectives 23-27 Enjoying the WHS	Without measures in place to minimise impact of events on both the WHS and the surrounding area, spreading the events throughout the year could result in even greater impacts, just spread over a longer timescale, with no periods of 'quiet' and/or opportunities for 'recuperation', especially of sensitive habitats. At certain times of the year the impacts may be felt more; for example winter events in wet weather may mean greater damage to ground condition and soil structure, with implications

	<p>for surface water drainage/flooding, soil compaction and robustness of trees and vegetation. Winter events can also be more visually intrusive as a result of leaf loss within park boundary belts.</p> <p>Similarly, spreading visitors throughout the site will need to be done with care. Certain areas will be sensitive to disturbance. The more isolated parts of the site will be some distance from the supporting facilities, such as WCs, which may necessitate investment in further infrastructure.</p> <p>It is good to see that recognition is given to these issues elsewhere within the Management Plan, especially under consideration of ‘environmental sustainability’, but it would be useful if reference was also made within the ‘challenges’ section.</p> <p>It is also good to see explicit reference given to the traffic issues associated with Blenheim. However, despite these issues being translated into ‘objectives’ (Objectives 23-27) and associated ‘actions’, there is little discussion about the possible solutions, for example, the inclusion of an active traffic management/parking strategy which could, for instance, give an assessment of the recent use of a park and ride scheme at Oxford Airport.</p>
<p>7.08, p61 Objectives 23-27 Enjoying the WHS</p>	<p>It should be noted, with the level of events having increased over the years and the intention to spread these events further, planning permission is likely to be required. The need to authorise this new approach to events should be brought to the attention of Blenheim Palace.</p>
<p>7.11, p62 Objective 22 Queen Pool</p>	<p>It is important that the findings of recent study are fully assessed prior to any plans to de-silt the Pool, particularly as this area is part of the Blenheim Park SSSI.</p>
<p>7.13, p63 Objective 3 Development</p>	<p>The approach to development within the WHS is generally acceptable and it must be remembered that the Management Plan does not affect the statutory obligations and considerations of the local planning authority. Clarification would, however, be useful in relation to the last bullet point as it is not clear as to whether this relates to existing modern buildings or to proposed new build. For existing modern buildings the bullet point would benefit with ‘existing’ before ‘modern’. For new build, given the heritage significance of the site, simply not detracting from the area’s character is not good enough. Where new development is appropriate in principle, a high quality of design will be required and the landscape and historic character of the area enhanced.</p>

<p>Objective 4, p68</p> <p>Co-ordinated approach to policies and projects</p>	<p>This objective is supported but it is also important that those responsible for managing the WHS recognise the need to also give consideration to the wider context of the site and the responsibilities of the statutory bodies. For example, the need to give consideration to the setting of the Cotswolds Area of Outstanding Natural Beauty and the Conservation Area and the opportunities of the Conservation Target Areas.</p>
<p>Objective 6</p> <p>Actions, p78</p> <p>Risks</p>	<p>In addition to landscape planting, it is also important to consider the risk associated with the effects of climate change on the hydrological system within and surrounding the WHS, including the impacts of flooding and drought. This may be especially relevant to the future management of Queen Pool.</p>
<p>Objective 10, p69-70</p> <p>Planning policy</p>	<p>The draft West Oxfordshire Local Plan 2031 does contain policies to protect the WHS and its setting. The Management Plan is identified as a material planning consideration.</p> <p>For added clarity, the actual wording of Objective 10 should be amended, firstly, to follow the same format as the other objectives and, secondly, to re-phrase the second part of the objective which is currently confusing.</p>
<p>Objective 16, p71</p> <p>Conserving the landscape heritage</p>	<p>A more appropriate objective than ‘giving consideration to’ would be ‘reducing the impact’. This objective would then read: ‘Reduce the impact where possible of game management practises where they affect international significance of both the designed historic landscape and the ancient woodland in High Park.’</p>
<p>Objectives 20-22, p81-82</p> <p>Conserving the natural heritage</p>	<p>These objectives and actions are supported but it is disappointing that the emphasis tends to be on maintaining and protecting the existing situation, rather than also enhancing the natural heritage. Two Conservation Target Areas, the Glyme and Dorn CTA and the Blenheim and Ditchley Parks CTA, cover much of the WHS; CTAs aim to restore biodiversity at a landscape-scale through the maintenance, restoration and creation of BAP priority habitats.</p>
<p>Objective 25, p72</p> <p>Enjoying the WHS</p>	<p>It is not clear what is meant by ‘all types of visitor access’. Clarification is needed.</p>
<p>Appendix I</p> <p>Figure 3: Designations/statutory protections</p>	<p>Typo in key: World, not Word</p> <p>Conservation Area in Long Hanborough has been omitted</p> <p>Consider adding local designations too: Conservation Target Areas, Local Wildlife Sites, Nature Improvement Areas</p> <p>In key perhaps should make clear that the Listed Buildings identified are</p>

	only those within WHS. Alternatively, also identify those on map outside the WHS.
Appendix I Figure 4: Public access and visitor facilities	Arrows on map but not in key Key identifies 'visitor access and exit routes'. Do these mainly relate to vehicular access? Consider also identifying the temporary park and ride car park at the edge of the airport
Appendix I Figure 5: Character of the setting	Figure 5 has been revised, with amendments to some of the designations. One of the main changes relates to land between the railway line and Long Hanborough which currently is within a zone 'where significant, tall or prominent development would affect the setting' of the WHS. The new designation, covering a larger area, is 'agricultural land which, due to its landform, significantly contributes to the setting of the World Heritage Site'. This revision is supported in principle. There is one field immediately to the north of Long Hanborough which has been excluded. While part of this field lies to the rear of a house in a large landscaped garden which acts as a buffer to the views from the WHS, the remaining part of the field contributes to the agricultural setting and should be included in the designation. There is also a revision to the extent of one of the 'Areas that are Significant to the Visual Setting of Blenheim'. Land south of Manor Road/west of Heath Lane, Bladon has been excluded. Land in the Combe area designated as 'Areas of intervisibility' has been amended: in some areas extended and, within the village, reduced. It would be useful to have a clear justification for the changes to the boundaries of the various character settings before Figure 5 is included in the Local Plan.
Appendix I Figure 8: Location of key features	Typo in key: World, not Word Consider adding CTAs, NIA and LWS