



South Oxfordshire District Council  
Abbey House  
Abbey Close  
Abingdon  
Oxfordshire  
OX14 3JE

Our ref: P01577936

10 July 2024

Dear [REDACTED]

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

**LAND TO THE NORTH OF THE CULHAM SCIENCE CENTRE, THAME LANE,  
NEAR CLIFTON HAMPDEN, OXFORDSHIRE, OX14 3GY  
Application No. P24/S1498/FUL**

Thank you for your letter of 5 June 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

Historic England understands the need for infrastructure to support the transition to net zero energy production in the UK. There is existing electricity infrastructure in this area which we understand makes it a suitable place for more. However, we identify clear harm to a highly significant registered parkland through the position of the proposed development and which is wholly exacerbated by the very poor landscaping proposals and we have deep concerns about the proposals.

We recommend the Council interrogate the location of the connection tower and whether it can be moved to reduce harm, amongst other possible amendments to layout. Where residual harm remains, we strongly urge the Council to seek meaningful heritage benefits that should then be weighed in the balance against the great weight that should be given to conservation of the registered parkland.

**Historic England Advice**

**Significance of Nuneham Courtenay and surroundings**

Nuneham is one of the best examples in Britain of a planned estate village, created



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after the first Lord Harcourt decided in 1761 to move the inhabitants to the new turnpike road (the present main road) in order to make a beautiful landscape garden surrounding his new villa (the core of the present Nuneham House).

Nuneham Park is a Grade I registered park and garden and has 3 principal phases, all designed to reflect the owners' wealth and power.

All Saints Church was the principal built feature of the 1st Lord Harcourt's arcadian garden designs (beyond the main villa house) and was designed in a very particular way to take advantage of the topography with sweeping views over the Thames valley and rural vista north towards the dreaming spires of Oxford.

The Flower Garden at Nuneham Courtenay was begun by the second Lord Harcourt before he inherited in 1777. It was laid out along informal principles by the poet William Mason according to the naturalistic principles espoused by Jean-Jacques Rousseau, who had visited Nuneham. Described in 1782 as 'such a flower garden as excels every flower garden which ever existed in history or romance', it was probably the first flower garden of its type in Britain, influencing countless later gardens, and it became a major attraction for visitors. It survives largely intact, together with its classical Temple of Flora.

Lancelot Brown was brought in by the second Lord Harcourt in 1778 to further improve the landscape and to lay out the grounds south of the house. The most important feature here is Carfax Conduit, a major example of Jacobean architecture removed from Carfax in Oxford city to improve the traffic flow and re-erected here as a focal point of the view southwards from outside the house, and from the riverside. But the enhancement of the main Abingdon driveway was, in both design and intent, a vitally important feature of his naturalistic reimagining of the estate. The sweeping southern drive took in naturalistic tree planting set within bucolic pasture, enclosed within a shelter belt round the perimeter of the park, amongst which paths and rides took you through the landscape, carefully unveiling experiences as you travel around.

The south drive continued beyond Abingdon Lodge (the gate houses) and was linked to a tree-lined avenue connecting the estate with the newly built Culham railway station (built 1844 and grade II\* listed itself). This avenue appears to have been subsumed in to the Culham airfield (RNAS Culham/ RMS Hornbill) from 1944 onwards. Remnants of this avenue appear to remain as do a number of buildings from the RNAS Culham. The historical layout which connects to Nuneham House and



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parkland also connects with and includes infrastructure associated with the railway. The history of the RNAS Culham is also of interest.

### Proposals

This application is for battery energy storage system (BESS), comprising a 500 megawatt (MW) battery storage facility laid out in 296 shipping containers, with 37 inverter houses together with a 14m high connection tower, substation and access tracks, all enclosed within perimeter fencing. Landscaping in the form of bunds, tree planting, hedging and areas of water are also proposed.

### Impact of the scheme on Nuneham Courtenay registered landscape

The proposed battery energy storage system would result in clear harm to a highly significant designated landscape. We also consider that the proposal has the potential to result in cumulative harm to the registered park and garden when taken together with the current live application for a solar farm to the north, should that scheme gain planning permission in its current form alongside this proposal.

Whilst the Culham Science Centre, some 180m south of the registered parkland, together with existing electricity infrastructure in the form of pylons and substations has altered the historical environs of the estate, the remaining largely undeveloped space between the parkland and the CSC allows it to remain a separate entity that isn't encroached upon by industrial development. This matters because it allows for a degree of appreciation of the parkland as a separate, private estate.

The proposals would further erode the remaining vestiges of the past layout of the estate (where it exists outside the registered area), which still contributes to its significance and our understanding of it.

This erosion is more serious within the boundaries of the registered area where deeply harmful and unsympathetic landscaping is proposed, along with the wholly alien feature of the 14m high connection tower. The proposed position of these features within the registered area would to all intents permanently remove the chance of meaningful restoration of lost planting in these areas. Restoration in the south of the parkland was a key recommendation within the 2019 Parkland Management Plan for the estate and whilst not a statutory document clearly illustrates, from a deep understanding of the whole estate, what sensitive and sympathetic improvements would be. (The Parkland Management Plan 2019 was produced by Askew Nelson Ltd - if the Council and applicant do not have access to this we recommend seeking a copy from the estate owners - we have an electronic copy).



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## Planning Policy

The National Planning Policy Framework (the Framework) sets out at paragraph 201 that Councils should, having understood the significance of heritage assets, look to avoid or minimise conflict between conservation and the proposals. Paragraph 205 makes very clear that great weight should be given to conservation of assets and the more significant the asset the greater the weight, regardless of the level of harm. Any harm to or loss of significance to designated heritage assets should be clearly and convincingly justified (paragraph 208) and this harm should be weighed against public benefits of the proposal (paragraph 209).

Supporting the Framework is the National Planning Practice guidance, that provides useful supporting commentary, which is relevant for this case. In particular paragraph 013 sets out that all heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change.

## Opportunities to avoid or reduce harm

There are 2 existing allocations in the local plan very nearby (STRAT8 and STRAT9) and we question whether if not all, some of the proposal could or should be located



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within one of these.

We recommend the Council interrogate further whether the harmfully alien feature of the connection tower could be positioned outside the registered area or could be lower in height, in order to reduce the harm it causes to the parkland.

Could the proposed features be sunken into a modified topography, and when combined with better planting could help reduce visibility and harm.

The Parkland Management Plan 2019 sets out a wide range of ways that the parkland can be restored. As mentioned above, best practice is for the design for the BESS to be informed by and make reference to this document. This is especially pertinent in relation to proposed restoration of landscape features which, currently, widely miss the mark and fail to take any real opportunity for heritage benefits.

Where any residual heritage harm remains (following further efforts to reduce harms) to this very special landscape we strongly urge the Council seeks to secure significant heritage benefits. It is critical to bear in mind that Grade I landscapes are the most important designed landscapes in the country, the NPPF makes clear that great weight should be given to their conservation (regardless of the level of harm), because they are a precious, finite cultural resource. A key feature of restoration in the southern portion of the park would be the reintroduction of a naturalistic shelter belt in its original location and supplementary or restoration planting of the woodland pasture (at least for landscaping to demonstrably respond to Brownian naturalistic planting principles and the restoration of features where possible). A longstanding aspiration for the burying of the electricity lines and removal of pylons seen in views from All Saints (to the north) would be a considerable heritage benefit.

We would welcome the opportunity to review proposed amendments and proposals for sympathetic restoration of the parkland.

### **Recommendation**

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of the NPPF.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely



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