

### Application consultation response

<b>Application reference:</b>	P24/S1498/FUL
<b>Site:</b>	Site north of Culham Science centre
<b>Proposal:</b>	Development for battery storage

#### Summary

The proposed development would result in significant adverse impacts on designated heritage assets, in particular the Nuneham Courtenay Registered Park and Garden.

#### Heritage Assets

The application site sits within and in the immediate setting of the Grade I Registered Park and Garden (RPG) of Nuneham House at Nuneham Courtenay. The registered park is a highly significant C18 parkland landscape and pleasure grounds containing a number of listed structures, follies and buildings including the Grade II\* Nuneham House.

The development is also within the immediate setting of the Nuneham Courtenay Conservation Area and in the wider setting of the Grade II listed Thame Lane Bridge, the Grade II listed Europa School and the village conservation area of Clifton Hampden.

#### Discussion

The proposed development is for a large area of shipping containers and inverter houses, laid out in formal lines, containing batteries for energy storage and associated infrastructure. The field of containers will connect to substations within the application site and adjoining Culham Science Centre sub-station. The proposal requires the construction of a 14m high transmission tower compound which is to be built within the designated RPG.

The Desk Based Heritage Assessment in Annex 1 to the Cultural Heritage Chapter of the ES describes impacted heritage assets, with the RPG the most impacted by the proposal. I do not propose to repeat their assessment of significance here.

The application proposes extensive mitigating features including new planting within the RPG atop a large bund structure, new ponds and extensive areas of 4m high acoustic fencing. The application documents suggest this proposed planting has been informed by historic maps and photographs of the parkland which show some areas of planting in this area historically. However, the addition of a bund to elevate the planting to create a larger visual screen of the development from within the designated landscape changes the historic topography of the area and the way in which the edge of the parkland was a softer transition into the open countryside that it joins. It is notable that this area once contained the southern drive to the main house, providing a transition between the agricultural lands and parkland; there is no evidence that a solid raised embankment of planting existed here to screen the surrounding agricultural lands.

I am concerned that the proposed mitigating planting would itself harm the character of the RPG by introducing an alien feature in the form of a raised woodland bank, cutting off the more open arable areas of the parkland from the open surroundings which are experienced both from within the RPG looking out to the south and south-west as well as in open views from towards the RPG.

Notwithstanding the above concerns about the nature of proposed mitigation planting and landscaping works, none of the proposed mitigation can offer meaningful softening to the proposed 14m high transmission tower compound which will be a substantial change in appearance and character of this part of the RPG. The area requires new tarmac road to provide access to the area and a wide area of hardstanding to accommodate the infrastructure. This would be considerably larger in area than the existing pylons to which it is to connect to and to which it has been compared. This tower compound

will be visible from a wide range of aspects both within the RPG and in its setting looking towards the rise of Nuneham Courtenay from public vantage points extensively across the south.

I am very concerned that the harmful impact of the proposal is downplayed in the submitted Cultural Heritage chapter of the ES owing to the assertion that the development is 'temporary'. 40 years of this type of built form should not be considered a temporary change, this is a considerable period of time in which the context of the RPG will be significantly impacted in a negative way. This is also particularly concerning when mitigating planting is not anticipated to be effective for 10-20 years and that the compound will remain a moderate adverse impact on the character of the parkland even after 20 years when the landscaping is hoped to reach maturity (as stated in para8.11 of the LVIA). It is also noted that the proposed transmission tower is not intended to be temporary and that this 14m high structure will be a permanent addition to the RPG. This indicates the proposal will result in a high level of harm to the RPG that proposed mitigation cannot overcome.

The Cultural Heritage chapter notes that there is likely to be a cumulative negative impact to the RPG from both this proposal and the provisions of strategic allocations, the mitigation of which is outside the remit of this application. Paragraph 3.157 of the Cultural Heritage Chapter notes that the development will have significant adverse effects on the designated heritage assets. The statement also notes that there will be a cumulative impact as a result of it adjoining areas of strategic allocations (STRAT9). What the chapter fails to recognise is that areas not removed from the Green Belt (including this application site) and areas of STRAT9 allocated site are set aside to provide Green Belt protection and enhancement to the RPG which the proposed development would fail to achieve. The strategic site allocations here are specifically required to avoid unacceptable visual impact on the RPG (see SOLP Policy STRAT8:1).

I am also concerned that justification is also provided in the form of comparison with the appearance of neighbouring CSC which also shows a lack of understanding of Local Plan Policies which seek to contain built form within the allocated area of CSC in order to preserve and better enhance the setting of the RPG given existing areas of degradation from built form.

#### **Relevant Policy Assessment and Conclusion**

This application has been tested against the requirements of the NPPF and Local Plan Policies STRAT6, STRAT8 and STRA9, ENV6, ENV7, ENV8, ENV9 and ENV10.

Local Plan allocations that remove land from the Green Belt specifically noted that development would only be permitted where it would not have an unacceptable visual impact on the surrounding area, in particular protecting the RPG and its setting. **This application would have an unacceptable impact on the visual integrity of the countryside both within and in the setting of the RPG contrary to the Local Plan.** The Cultural Heritage chapter of the submitted ES identifies that the proposal would have a significant adverse impact on heritage assets.

Local Plan Policies for land on and around CSC (STRAT8 and STRAT9) specifically require the protection of the RPG and its setting. STRAT6 specifically seeks to preserve the application site as part of the Green Belt in order to secure protection of the RPG and surrounding valuable landscape. This proposal is in direct contradiction of these policies and results in harm to the designated heritage asset of Nuneham Courteny Registered Park and Garden. As such it is also contrary to Local Plan Heritage Policies ENV6 and ENV10 which specifically seek to protect the district's heritage assets.

As submitted, the proposal is contrary to local plan policy and the NPPF as it will result in harm to the significance of designated heritage assets. Specifically, any harm or loss of significance to Grade I registered parks and gardens should be wholly exceptional under the tests of paragraph 206 of the NPPF. Whilst the battery storage structures are not proposed within the designated area, the large compound facility results in a permanent industrial change to the character of the area. The development and proposed mitigating planting fails to respect the manner in which the park is experienced within its setting with proposed screening planting changing the character of the RPG, contrary to the historic landscape's character and relationship to the countryside.

This application is contrary to paragraphs 205 and 206 of the NPPF and Local Policies ENV6 and ENV10 due to harmful nature of proposed development and mitigating planting both within and in the setting of the Grade I Registered Park and Garden.

If you are minded to approve this application you must be certain that there are considerable public benefits to the proposal that significantly outweigh the identified harm to heritage assets.

<b>From</b>	<b>Samantha Allen BA(Hons) MSc IHBC</b>
<b>Date</b>	17 June 2024