

CULHAM STORAGE LIMITED

SUMMARY PROOF OF EVIDENCE ON LANDSCAPE AND VISUAL MATTERS ON BEHALF OF THE APPELLANT

Mr Christopher McDermott BSc BLD

Director of Sightline Landscape

Appeal against the refusal of planning application P24/S1498/FUL:

The development of a Battery Energy Storage System (BESS), comprising a 500 megawatt (MW) battery storage facility with associated infrastructure, access and landscaping, with a connection into the Culham Jet National Grid substation

Land to the north of the Culham Campus Thame Lane near Clifton Hampden, OX14 3GY

- 1.1. I am Christopher Nigel McDermott, and since 2013 the director of my own consultancy, Sightline Landscape Ltd, based in Bath, Somerset. I have a Batchelor of Science in Botany and a Batchelor of Landscape Design. I qualified as a Chartered Landscape Architect in 1989 and have been a member of the Landscape Institute until 2020. I have practiced continually throughout, previously working for a mix of large multi-disciplinary consultancies and smaller practices.
- 1.2. I am the landscape consultant for the Culham Storage project and have worked on it since its inception. I have visited the Appeal Site on numerous occasions in winter and summer. I produced the Landscape and Visual chapter of the Environmental Statement for the Appeal Proposal and produced the detailed landscape design. I am instructed on behalf of the Appellant, to present evidence relating to landscape and visual matters as a competent assessor in respect of the Inquiry. The evidence which I have prepared and provide for this Appeal in this proof are my true opinions. In this PoE I will summarise the effects of the Appeal Scheme on the Setting of Nuneham Courtenay Registered Park and Garden, the landscape character of the Site and its surroundings, the visual amenity of walkers on the Oxford Green Belt Way and the openness of the Green Belt.
- 1.3. Historic maps indicate that a tree belt existing along the southern perimeter of the estate, which is defined by the Parish Boundary. This boundary passes through the Appeal Scheme. This tree belt was removed as part of the construction of RNAS Culham in 1944. A secure perimeter 2.5m high concrete post and mesh fence was erected around the southern part of the parkland to secure the airfield and remains to this day. Since the 1950's the main airfield land has been developed as the Culham Science Centre (STRAT8).

- 1.4. SODC states that *“the site proposed for battery storage provides a valuable transition between the RPG and the Culham Science Site”*. In my view it is an ineffectual transition, the landscape of the RPG just bleeds out into a landscape adversely affected by a railway line, overhead transmission lines, the CSC and eventually the urban development of STRAT9. Standing at the elevated viewing location of the southwest facing slopes of the RPG the existing and proposed 20th and 21st century intrusions will extend right across the field of view. The loss of the tree belt means that there is nothing to indicate where the southern part of the RPG ends.
- 1.5. The Appeal Proposal will, in the long term, establish a truly valuable transition. It will re-establish the tree belt which once defined the boundary to the RPG, beneficially creating a clear understanding of the correct change in landscape character from the Parkland Estate Farmland north of the Parish Boundary and to the Open farmed Hills and valleys to the south. It will allow an observer to identify the southwestern boundary to the RPG. Modern interventions, such as the transmission lines) mean that it is not possible to replant the tree belt exactly as it is shown on the early OS maps, but a sufficient portion can be established to achieve the objective.
- 1.6. If it is determined that the principle of restoring this boundary tree belt is beneficial, then on the assumption that detailed landscape design will be a condition, there is the opportunity for the landscape design and its future management to be modified in consultation with stakeholders to achieve the most appropriate outcome. The Appeal Scheme will not result in any loss of landscape features within the RPG, such as trees or hedges, which might otherwise cause direct harm.
- 1.7. I accept that the Appeal Scheme will initially have a Moderate – Major adverse effect on the landscape character of the Appeal Site due to the temporary introduction of electrical infrastructure and this effect will remain for the area covered by the BESS compound and Customer Substation for the 40 Year operational life of the Appeal Scheme. As the restorative landscape within the RPG establishes and matures the adverse effects on the landscape setting of the RPG will decline, becoming Minor beneficial towards the end of the operational life of the facility.
- 1.8. It is evident that the setting of the RPG will be adversely influenced by the build out STRAT9 urban area and development within STRAT8 for 20+ years. By Year 20 the proposed tree belt will have matured sufficiently to start effectively protecting the setting of the parkland from the BESS, STRAT9 and STRAT8. Once the electrical infrastructure has been removed the effect of the retained landscape on the character and setting of the RPG will be Moderate and beneficial.

- 1.9. Regarding the effect of the Appeal Scheme on the openness of the Green Belt, the proposed landscaping within the RPG will have no adverse effect on openness. The BESS and Customer Substation will have a temporary adverse effect on openness, but this should be regarded as a means to a beneficial end in that it will facilitate the restoration of the tree belt along the southern boundary of the parkland, achieving more important long-term landscape and heritage benefits.
- 1.10. Once the operational period of the BESS element has ceased the southern portion of the site can be restored to a landscape of grass and trees, preserving the openness of the Green Belt through a more robust landscape framework. While the point of connection compound and tower will remain, transmission lines are clearly a feature of Green Belts and so the addition of a new connection point will not have a significant adverse effect on Openness.
- 1.11. Reason 3 for refusal states that the Application Scheme would “*introduce an urban industrial development into an important area of rural countryside. It would result in significant adverse effects on the landscape character and to views including those from public rights of way. The proposed mitigation is ineffective in mitigating this harm*”.
- 1.12. I accept that the BESS compound, Customer Substation, connection compound would have a temporary significant adverse effect on the landscape character of the Appeal Site but on decommissioning the legacy of tree and hedge planting will enhance landscape character. The tree belts and planting will re-establish parkland character.
- 1.13. Regarding the adverse effects on visual amenity. The Appeal Scheme will not result in any adverse effects on people within existing residential properties and woodland planting within the Appeal Scheme will ensure that the visual amenity of future inhabitants of STRAT9 will be protected. The only significant visual effects will be to users of the Oxford Green Belt Way as it runs between the railway and STRAT9 and skirts around the CSC. The entirety of this section is currently substantially adversely affected by electrical infrastructure, industrial and commercial development. It will be further affected by any development within STRAT9 and the CSC.
- 1.14. In my opinion the CSC and electrical infrastructure currently visible along the route of the byway are so dominant that the effect of the Appeal Scheme on the setting and sequential experience of users will, overall, result in a Moderate adverse effect on their visual amenity. This adverse effect is compensated for by the provision of permissive access to the RPG.
- 1.15. Looking to the future, the allocated STRAT8 and STRAT9 cover a total of 294 hectares. The proposed BESS compound, customer substation and connection tower will cover 5 hectares, equivalent to 1.65% of the allocated development area. Given that the majority of STRAT8 and STRAT9 will be visible to users of the PRow network in the area an additional 1.65% of electrical infrastructure by area over a comparatively short length of PRow

will not, in my opinion, have a significant cumulative effect on visual amenity. The legacy of the Appeal Scheme will be to beneficially reduce the cumulative landscape and visual effects of the permanent developments within STRAT8 and STRAT9, including their effects on the setting of the RPG.

- 1.16. The long-term legacy is that these elements will enhance landscape character in compliance with Local Plan Policies ENV1, DES1 and DES2, the Landscape Strategy and Guidelines as set out in the Landscape Character Assessment for South Oxfordshire and Vale of White Horse and the Culham Design Code Policy OVS2.0.1, as well as considerations in NPPF paragraph 135 and 180.
- 1.17. It is my assessment that this scheme can ultimately deliver a permanent beneficial restoration of the southern boundary of the RPG. The proposed tree belt will physically define its boundary and protect its setting from adjacent existing and allocated 20th and 21st development, long after the temporary BESS scheme has been decommissioned. It is this beneficial outcome that should be taken forward into the wider planning balance.