

Appeal Reference: APP/Q3115/W/24/3358132

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Landscape Proof of Evidence on behalf of

South Oxfordshire District Council

Prepared by Anne Priscott BaHons CMLI

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, Clifton Hampden, OX14 3GY

Outline Planning Application No. P24/S1498/FUL

Planning Inspectorate Appeal Reference: APP/Q3115/W/24/3358132

May 2025

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Separately bound documents:

Appendix A Sales LJ in Turner v Secretary of State for Communities and Local Government [2016] EWCA Civ 466

Appendix B Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council (Appellant) [2020] UKSC 3

Annex A: Landscape and Visual Assessment Tables and LVIA Review

Annex B: Viewpoint Analysis

Annex C: Landscape Character Impact Assessment

Annex D: Comparative Viewpoint Tables

Annex E: Cumulative Impact Assessment

Annex X: Walking Route Covering both Landscape and Heritage Impacts

SUMMARY OF PROOF OF EVIDENCE

- s1. My name is Anne Priscott, I am a chartered landscape architect with 30 years' experience. I appear at this Inquiry to address the landscape and visual impact issues relating to the proposed development on land at Culham and resultant conflicts with landscape, including Green Belt related, policy.
- s2. Section 1 of my proof of evidence sets out my Witness Background, Experience and Particulars.
- s3. I was instructed by the Council following the lodging of the Appeal and after having discussed the site proposals with the Council officers and Mr Mark Reynolds. I then made myself familiar with the site before taking instructions.
- s4. Section 2 of my proof of evidence presents an introduction and Section 3 sets out the scope of my landscape evidence.
- s5. Through my evidence I consider the effects of the proposed development upon the landscape and visual receptors; noting that in addition there would be impacts on the historic landscape that cross over with the cultural heritage evidence of Ms Sasha Berezina. The landscape requirements of NPPF, local and neighbourhood planning policy would not be met by the revised Appeal Scheme, and there would be detrimental impacts to landscape character and on views. In addition, I consider the effects of the proposed development on the objectives of the Green Belt and impacts on openness.
- s6. When taking into account the planned employment and strategic housing allocation sites (STRAT 8 & 9) and other planned development that has been adopted as strategically appropriate for this landscape, I identify how the proposed development would bring about additional cumulative impacts that would incur further harm than for a stand-alone scheme in this landscape.
- s7. The main landscape and visual related Reason for Refusal given by South Oxfordshire District Council (the 'Council') states:
- s8. ***RFR1 – Green Belt “The development is inappropriate development in the Green Belt that would be harmful to the spatial and visual openness of the Green Belt***

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and would conflict with the purposes of the Green Belt. This site additionally provides an important Green Belt function in relation to strategic sites removed from the Green Belt for development. The application does not constitute very special circumstances as required by the National Planning Policy Framework to outweigh the substantial harm to the openness of the Green Belt. As such, the proposal is contrary to the NPPF, and Policies STRAT6 and DES9 of the South Oxfordshire Local Plan 2035.”

- s9. **RFR2 – Landscape Character** *“The site proposed for battery storage provides a valuable transition between the registered parkland and the Culham Science site. The battery storage is large scale, would be industrial in appearance, and 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 and the proposal is contrary to the NPPF, and Policies ENV1, DES1 and DES2 of the South Oxfordshire Local Plan 2035, and Policy CUL5 of the Culham Neighbourhood Plan. Further, this proposal, in addition to the development on allocated sites STRAT8 and STRAT9, will create an increased cumulative impact harmful to the landscape character of the area, contrary to Policies ENV1, DES1 and DES2 of the South Oxfordshire Local Plan 2035.”*

- s10. Section 4 describes the Appeal Site and landscape context and records my own assessment of the landscape value of the site and environs, concluding that this is a valued landscape in relation to NPPF paragraph 187 (a) and should therefore be protected and enhanced. I draw on the South Oxfordshire Landscape character assessment (2017) (CD 5.4) used in the LVIA (CD 1.1.50) and base my evidence on the 2024 Landscape Character Assessment (CD 6.1) that has objectives set out for this area that include protection and enhancement of the parkland character.

- s11. I draw on the submitted LVIA produced by Chris McDermott (CD 1.1.50) that accompanied the application and update (CD 2.3.18). I supplement my analysis with

recent photography to illustrate points I would like to draw the Inspector's attention to at **Annex X**.

- s12. I have reviewed the Pre-app advice (**CD1.5.1**) noting that at the outset the landscape officer expressed concerns about the ability of the proposed development, in this location, not being able to be accommodated in the receiving landscape due to the high value and susceptibility to change of the site and its resultant high sensitivity.
- s13. In my Proof the Appeal Site is described, including the site character, the landscape patterns found in this part of the landscape and the way that the Appeal Site is currently experienced. I take account of the South Oxfordshire Landscape Character Assessment (2024) (**CD 6.1**) and the key characteristics that are valued and are vulnerable to the proposed development as well as the notable landscape qualities set out in the Parkland Management Plan (**CD 6.2**).
- s14. I record that there are adjacent, medium and long-range views afforded of the Appeal Site. All of these views are highly valued, being located in either the Green Belt or the Grade 1 Registered Park and Garden (RPG) and therefore in locations where the viewer's attention is more likely to be focused on landscape views and both landscape and visual value are higher.
- s15. Section 5 of my evidence sets out the summary of my own landscape and visual impact assessment. This part of my evidence describes the context of the Appeal Site in relation to the allocations under Policy STRAT 8 & 9 describing the landscape requirements and how these would be compromised by the proposed development.
- s16. My evidence presents a summary of my conclusions reached relating to the likely significant and adverse changes that would be brought about through the development of the Site with the Appeal Scheme compared to possible alternative development option that I consider would not result in the level of harm to the landscape or to views from the Oxfordshire Green Belt Way route and would meet the placemaking principles set out in the STRAT 8 and 9 policies. I draw on the evidence base used by the Council in formulating the STRAT 8 and 9 allocations.

- s17. In Section 6 I analyse the impact the Appeal Scheme would have on the purposes and openness of the Green Belt.
- s18. In section 6 I also demonstrate that other options would bring about less harm and would enable the quantum of battery storage to be accommodated without substantially compromising the Green Belt purpose or landscape openness. I draw on information set out in the BESS **Site Selection** document (**CD 1.1.47**). I note that in 2016 a 200MW BESS application was consented on the site application ref: P16/S2368/FUL, and that that application has not been developed.
- s19. At the time of the application 7ha was required for the siting of 296 + 37 containers. The Appeal scheme only requires 248 + 31 containers and logically comes close to being able to be accommodated in other more appropriate landscape locations where the landscape value and sensitivity are lower and effects are likely to be able to be contained by existing mature tree and woodland cover and in a location where there is not the conflict with the views and landscape context of the future settlement (STRAT 9) or Grade 1 RPG.
- s20. Notably, the landscape officer drew attention to this Site Selection study and that the reasons the Appeal Site was selected were not landscape related. By combining parts of the other alternative sites considered would yield 500Mw BESS capacity without the magnitude of impacts on landscape, views, historic landscape or the openness of the Green Belt.
- s21. In section 7 I analyse the Appeal proposals in relation to Reason for Refusal 1.
- s22. Whilst there is analysis underpinning the allocation for development of around 3,500 dwellings (STRAT 9) being able to be accommodated in an adjacent part of the landscape, there is a requirement to protect the Green Belt a purposes and openness, and to protect the landscape of the RPG and it's setting from harm.
- s23. I set out why I consider that ***the development is inappropriate development in the Green Belt.***
- s24. I set out why I consider that the Appeal Scheme ***would be harmful to the spatial and visual openness of the Green Belt.***

- s25. I set out why in my opinion the Appeal Scheme **would conflict with the purposes of the Green Belt.**
- s26. I set out why I consider that **this site additionally provides an important Green Belt function in relation to strategic sites removed from the Green Belt for development.**
- s27. Mr Mark Reynold's analysis identifies that **the application does not constitute very special circumstances as required by the National Planning Policy Framework to outweigh the substantial harm to the openness of the Green Belt.**
- s28. In Section 8 I set out my conclusions, reviewing the proposals against the policies set out in Reason for Refusal 1.
- s29. In section 9 I analyse the Appeal proposals in relation to Reason for Refusal 2.
- s30. I set out why I consider that **the site provides a valuable transition between the registered parkland and the Culham Science site.**
- s31. I set out why I consider that **the battery storage is large scale, would be industrial in appearance, and would introduce an urban industrial development into an important area of rural countryside.**
- s32. I identify through my analysis that **it would result in significant adverse effects on the landscape character and to views including those from public rights of way.** I set out why I consider that **the proposed mitigation is ineffective in mitigating this harm.**
- s33. In Section 10 I record my conclusions, reviewing the proposals against the policies set out in Reason for Refusal 2.
- s34. I review the landscape officer consultation responses and describe how, as articulated by the district landscape officer Hazel Osborne, in my opinion she is correct in identifying that the detailed proposals submitted (the Application Scheme) do not respond sufficiently to the local landscape character around the Appeal Site and I articulate the level of harm the Appeal Scheme would have on the locality relative to a scheme in a better located and more accommodating part of the landscape.

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- s35. I set out the extent to which the proposals would be incompatible with the designated landscape patterns and character, and how the illustrative mitigation measures incorporated, as shown on the landscaping plans, whilst relatively extensive, are inappropriate and thus not in accordance with Policies ENV1, DES1 and DES2 of the South Oxfordshire Local Plan 2035, and Policy CUL5 of the Culham Neighbourhood Plan.
- s36. I explore the extent to which the proposals would harm the character and setting of the landscape and erode the rurality of the setting of the RPG particularly when viewed from the Oxfordshire Green Belt Way. I also consider how the development of the site fails to deliver sufficient meaningful multi-functional GI gains.
- s37. In addition, I articulate why Reason for Refusal 2 correctly identifies that the appeal scheme would, in addition to the development on allocated sites STRAT8 and STRAT9, create an increased cumulative impact harmful to the landscape character of the area, contrary to Policies ENV1, DES1 and DES2 of the South Oxfordshire Local Plan 2035.
- s38. My appeal statement therefore identifies why in my view Reasons for Refusal 1 and 2 can be robustly supported. I draw the conclusion that the development of the Site would disrupt the highly valued and sensitive landscape patterns and impact on highly valued views in an unacceptable way, would impact on the purposes of the Green Belt and unnecessarily impact on openness particularly considering that there are alternatives that would not adversely impact in so great a way.

Anne Priscott (CMLI)

May 2025

Section 1: Witness Background, Experience and Particulars

1. My name is Anne Priscott, I hold a Bachelor of Arts degree in Landscape Architecture (BA Hons) awarded by Edinburgh College of Art / Herriot-Watt University. I have been a fully qualified member of the Landscape Institute since 1996 and principal of Anne Priscott Associates Ltd since 2004. I am a Chartered Landscape Architect and Chartered Member of the Landscape Institute (CMLI). I have gained 30 years of landscape architecture and landscape planning consultancy experience.
2. I have undertaken work involving environmental planning and landscape consultancy service to developers, land managers and public bodies with an interest in environmental issues; as well as to government departments, and local authorities. I specialise in addressing landscape planning issues which relate to a wide range of development projects and have gained experience with more complex landscape issues, often in places with high landscape sensitivity and value. Prior to setting up my own practice I worked for ADAS, Nicholas Pearson Associates and Land Use Consultants. In the late 1990s and early 2000s I worked through ADAS on the Countryside Stewardship Scheme reviewing and monitoring parkland restoration plans on behalf of MAFF (now DEFRA).
3. In 2004 I set up Anne Priscott Associates Ltd. I have produced over 200 landscape and visual impact assessments (LVIAs) and landscape and visual appraisals (LVAs) for projects and have reviewed a large number of LVIAs for complex developments on behalf of local planning authorities. I am currently advising five local planning authorities on major developments, including renewable energy projects in Wales, and advising two on their main allocations as part of their local plan reviews.
4. I have gained considerable experience of and involvement in a wide range of development and built infrastructure projects throughout the UK, many of which have involved sites in statutory protected landscapes and Green Belts as well as NPPF 'valued landscapes'.
5. I have acted as an expert witness at numerous hearings and over 30 public inquiries, including a Section 36 Electricity Act (wind farm) Inquiry and projects of national significance, for both local planning authorities and developers.

6. This landscape proof of evidence is based on my own professional judgement and is presented in accordance with the guidance of the professional Code of Conduct of the Landscape Institute, my professional institution. The content of this proof is true to the best of my knowledge and belief and my evidence is presented irrespective of by whom I am instructed.
7. Prior to taking instructions to act on behalf of the Council I undertook a review of the landscape character assessments (2017 & 2024) and landscape policy relating to the Appeal Site and the proposed development, a review of the supporting plans, landscape impact documentation and other relevant documents submitted with the application including the detailed landscape plans. I also visited the Appeal Site prior to formulating my own opinion in relation to the issues with the development proposals on this site.
8. I have visited the Appeal Site on three occasions, including walking the public rights of way, fields of the Site, access roads and Nuneham Courtenay Parkland and grounds and neighbouring urban and rural spaces as well as visiting the broader landscape context to the site, including visiting all of the LVIA viewpoints.
9. I am aware of the consultation, including at the pre-app stage, that took place between the Appellant and the landscape officer and have highlighted in my proof of evidence where my professional opinion accords with the landscape officer.
10. I concluded that I could appear on behalf of the Council as I considered that the appeal proposals presented would create an unacceptable form of development in terms of scale and extent in relation to the designated and undesignated receiving landscape, would impact on the character of the landscape, historic landscape patterns and views and would impact on the perception of openness of the Green Belt in particular.

Section 2: Introduction

11. I attend this Public Inquiry at the request of South Oxfordshire District Council and am instructed to present evidence relating to landscape and visual matters in respect of the refusal of an application for outline planning permission which was submitted to the Council. The application (LPA ref P24/S1498/FUL) proposed the development of 500 Mw of BESS storage in 296 containers and 37 larger inverter houses and was refused. The Appellants are seeking for a revised scheme, “**the Appeal Scheme**”, to be considered by the Inspector:
12. The proposed Appeal scheme comprises 248 sound insulated lithium-ion battery units housed within standard sized shipping containers and 31 larger noise insulated inverter houses to accommodate the inverters and transformers.
13. The details of this revised scheme are reviewed and impacts evaluated in my proof and appraised in terms of landscape and visual impacts and policy implications. Notably, this scheme has not been previously advertised, and consultee comments have not been received at the time of proof exchange. Notably, the district landscape architect has not had the opportunity to make comments on the changes proposed by way of this revised scheme.
14. My landscape proof of evidence comprises a main written statement, separate appendices, annexes and a summary. **Annex X** has been written jointly by Ms Sasha Berezina and myself, covering both landscape and historic landscape matters and the Inspector is invited to use this on the unaccompanied site visit.

Section 3: Scope of Evidence

15. In presenting my evidence I articulate and explain why in landscape and visual terms the scheme would be unacceptable given the character and appearance of the Appeal Site and its relationship to the surrounding existing and planned settlement context and rural landscape, including the Green Belt and Grade I Nuneham Courtenay Registered Park and Garden (RPG), recognising that the overall planning balance is for others to comment on.
16. The application was refused for the following landscape related reason:
17. ***RFR1 – Green Belt “The development is inappropriate development in the Green Belt that would be harmful to the spatial and visual openness of the Green Belt and would conflict with the purposes of the Green Belt. This site additionally provides an important Green Belt function in relation to strategic sites removed from the Green Belt for development. The application does not constitute very special circumstances as required by the National Planning Policy Framework to outweigh the substantial harm to the openness of the Green Belt. As such, the proposal is contrary to the NPPF, and Policies STRAT6 and DES9 of the South Oxfordshire Local Plan 2035.”***
18. ***RFR2 – Landscape Character “The site proposed for battery storage provides a valuable transition between the registered parkland and the Culham Science site. The battery storage is large scale, would be industrial in appearance, and 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 and the proposal is contrary to the NPPF, and Policies ENV1, DES1 and DES2 of the South Oxfordshire Local Plan 2035, and Policy CUL5 of the Culham Neighbourhood Plan. Further, this proposal, in addition to the development on allocated sites STRAT8 and STRAT9, will create an increased cumulative impact harmful to the landscape character of the area, contrary to Policies ENV1, DES1 and DES2 of the South Oxfordshire Local Plan 2035.”***

19. I conclude that the landscape requirements of NPPF, local and neighbourhood planning policy would not be met by the revised Appeal Scheme, and there would be detrimental impacts on the landscape and views.
20. When taking into account the planned employment and strategic housing allocation sites (STRAT 8 & 9) and other planned development that has been adopted as strategically appropriate for this landscape, the proposed development would bring about additional cumulative impacts that would cause further harm than for a stand-alone scheme in this landscape.
21. Through my evidence I consider the effects of the proposed development upon the landscape and visual receptors; noting that in addition there would be impacts on the historic landscape that cross over with the cultural heritage evidence of Ms Sasha Berezina. There is a natural overlap between landscape and historic landscape character and views.
22. Similarly, there is an overlap between my evidence and the planning evidence of Mr Mark Reynolds. I consider impacts on the visual aspect of openness and my landscape and visual evidence on spatial openness feeds into the overarching conclusions drawn by Mr Reynolds in his planning balance evidence.

Section 4: The Appeal Site and Local Context

23. Section 4 of my proof of evidence now describes the Appeal Site and landscape and visual context.
24. The baseline landscape is described in the LVIA (**CD 1.1.50**) in section 4, pdf page 12-13 and therefore not repeated in my proof. Whilst broadly correct in terms of the presence of physical features and the evolution of the landscape over time, the relationship between these, as expressed as character and how this is experienced, is not as clearly described.

Landscape Evidence Base and Supplementary Planning Documents

Landscape Character Assessment

25. The environs of the Site are described in detail in the **South Oxfordshire Landscape Character Assessment** (2017) (**CD 5.4**). This was the baseline used in the LVIA. An updated landscape character assessment (LCA) was adopted in 2024 (**CD 6.1**). The Site lies within the **Parkland and Estate Farmlands LCT 15** landscape character type of the 2017 LCA, identified on **pdf page 77**.
26. The site is characterised as falling within the LCA (2024) **7D Oxford South Ridge Hilltops**. The descriptions of the landscape character are set out in document **Landscape Character Assessment Appendix A LC7 Ridge Top (CD 6.1)**.
27. I have undertaken an assessment of the effects of the Appeal Scheme on the key characteristics of the 2017 landscape character type (used in the LVIA and written before the updated LCA was published) and the Oxford South Ridge Hilltops landscape character area of the 2024 LCA at **Annex C** that demonstrates, whichever assessment is used, that the proposed development would be located within, and significantly affect, an area of high landscape value.
28. The area is also of high landscape susceptibility, predominantly based on the Green Belt objective of maintaining openness and the historic landscape character being highly sensitive to change and a finite resource. The openness of the landscape enables changes

to be less readily assimilated than in a more accommodating landscape setting. Landscape sensitivity is therefore high. This accords with the conclusions of the **Landscape Sensitivity Study** (2018) (**CD 3.4.5**) judgements.

29. In **Annex C** I conclude that overall, the proposed development would impact on all of the key characteristics of the Parkland and Estate Farmlands Type over a broad area. The magnitude of change would be high. The effect substantial and significant.
30. The **South Oxfordshire Landscape Character Assessment** (2017) (**CD 5.4**) sets out recommendations to protect, conserve, enhance and restore the landscape qualities of South Oxfordshire in the Nuneham Ridge part of the district.
31. In relation to the introduction of tall buildings and structures into the landscape, such as communication masts and electricity pylons, this document states in the development guidance and potential mitigation tended:
 - *Conserve the agricultural character of Nuneham Courtenay Ridge by managing and restricting, where possible, the development of tall buildings and structures where these would adversely affect views.*
 - *Minimise impact by locating new communication masts on existing structures or by using existing masts.*
 - *Bury cables underground and seek opportunities to bury existing overhead cables.*
32. In relation to the parkland character, it guards against inappropriate or inconsistent management, or neglect of existing parklands:
 - *Safeguard, maintain and enhance and the characteristic landscape features of existing parklands (particularly at Nuneham Park) including mature trees, avenues of trees, lakes, woods and walls.*
33. Similarly, the 2024 LCA sets out a series of landscape strategies and guidelines, with a strong emphasis on maintaining the open and wooded rural character of the landscape which forms the wider setting to Nuneham Courtenay RPG and forms gaps between

individual settlements, helping to retain their individual identities and their rural character.

34. The site and its immediate environs form part of the parkland. How this relates to the layers of landscape, including those designed by Capability Brown, is set out in Ms Sasha Berezina's evidence.
35. The clumps of trees, woodlands and copses present were laid out to specifically provide a series of landscape experiences for those arriving at the parkland via Abingdon Drive including passing the avenues leading up from the railway station, across the back drive, through the gatehouse and up over the west-facing slope into the parkland on the plateau before heading towards the main house.
36. Similarly, the parkland was laid out to create a strong series of spaces and experiences for the carriage ride back down Abingdon Drive to the station from the main house. The Nuneham Parkland Management Plan (**CD 6.2**) identifies the character of the southern parkland area within the Nuneham RPG. Section 7 of this report records the vision and management policies for the parkland, noting that new planting should *take into account dynamic views journeying along the Abingdon Drive* (bottom of printed page 148). **Appendix A (CD 6.2.1)** to the Management Plan records the tree species present in the park.
37. Paragraph 6.5.1 records that: *The Park (South) area is shown as agricultural land and gorse on Smith's 1707 Map of the Estate. It was cleared and transformed into parkland by 1768. The Abingdon Drive crossed South Park by 1768. The South Park is the focus for Brown's Plan of Alterations 1779, and the 1st edition OS (1875) shows that his planting proposals had been implemented. Scattered individual parkland trees and groups of trees created dynamic views across the park. Comparison between Brown's plan and Smith's map shows that Brown also appears to have utilised existing field boundary trees within his designs, probably to give a sense of maturity to the park.*

38. There is nothing random or accidental about the layout of the trees and woodlands, their relationships to the landform and each other and the experiences the landscape lends to someone moving through the parkland and surrounding pastureland.
39. The landscape is now mature and can be experienced, plus or minus some elements, as was intended when created in the 18th century. Ms Sasha Berezina describes the parkland character and how it was intended to be experienced and is now experienced in detail in her proof of evidence (paragraph 5.7).
40. Whilst much of this route is not able to be walked by the public, today the experience of seeing the parkland and how the views change as a walker moves through the landscape can be observed from the Oxfordshire Green Belt Way that takes a walker through the setting of the parkland. To the casual observer the parkland character can be easily appreciated despite the presence of the former airfield development and the electricity infrastructure.
41. This route is described in the joint landscape and cultural heritage site visit walking route at **Annex x**.
42. The LVIA author (**CD 1.1.16**) sets out in paragraph 4.25 that: *It is concluded that there is a distinction to be drawn between the value and authenticity of the core Ornamental Parkland, as defined by the Conservation Area (CA) designation, and the wider Farmed Estatelands which is included within the Historic Park and Garden Listing. This quality and character of this western area is substantially adversely affected by the railway, transmission lines and the CSS. This area exhibits a strong urban fringe character, the negative aspects of which will increase as the allocated urban expansion area is built out.*
43. It is my opinion that the LVIA author has underplayed the value of the landscape both inside and outside of the RPG boundary, and as researched and described by Ms Berezina, the connections between the parkland and the railway.
44. This underplaying starts with the assessor combining landscape quality with susceptibility to define landscape sensitivity. This is the wrong approach and leads to the value of the landscape not being recorded in the assessment process.

45. GLVIA3 sets out that:

3.25 A step-by-step process, as illustrated by Figure 3.5, should allow the identification of significant effects to be as transparent as possible, provided that the effects are identified and described accurately, the basis for the judgements at each stage is explained and the different judgements are combined in easy to follow ways.

Step 1: Assess against agreed criteria

3.26 The initial step should be to consider each effect in terms firstly of its sensitivity, made up of judgements about: the susceptibility of the receptor to the type of change arising from the specific proposal; and the value attached to the receptor; ...

46. Value is defined by the LVIA author using the Box 5.1 approach from GLVIA3 based on Swanwick and LUC 2002.
47. LVIA paragraph 4.29: *It is concluded that the Landscape Value of the Site outside the Registered Park and Garden is Low. While the value of the Registered Park and Garden should potentially be high, it is adversely affected at the western end by the limited public access, electrical infrastructure, its proximity to the railway, motocross site, the CSS, and the loss of original landscape features, such as the tree belt along the parish boundary. As a result its Landscape Value of the Site is overall considered to be Medium.*
48. LVIA paragraph 4.30. *The Landscape Value of the CSC to the west is mainly as an urban research facility and so in terms of landscape is considered to be Low.*
49. I have reviewed the Pre-app (**CD1.5.1**) noting that at the outset the landscape officer expressed concerns over the proposed development, in this particular location, not being able to be accommodated in the receiving landscape due to the high value and susceptibility to change of the site and its resultant high sensitivity.
50. The LPA landscape officer also noted in her consultation response to the application that she still had concerns over the underplaying of the sensitivity of the landscape (**CD 1.3.26**).
51. The Box 5.1 approach to defining landscape value has been superseded by the LI publication: **Technical Guidance Note | 02/21 Assessing landscape value outside**

national designations (CD 6.11). I have undertaken an assessment of landscape value using this 2021 guidance at **Annex A**.

52. On this basis I conclude that the landscape is highly valued for most of the prescribed criteria and is therefore a **valued landscape** in relation to NPPF paragraph 187 (a) and should be **protected and enhanced**.

Views

53. I record in my **Annexes B and D** that there are adjacent, medium and longer-range views afforded of the Site. All of these views are highly valued, being located in either the Green Belt or the Grade 1 Registered Park and Garden (RPG) and therefore in locations where the viewer's attention is more likely to be focused on landscape views and both landscape and visual value higher.
54. The main visual receptors are the users of the Oxfordshire Green Belt Way. This path follows a route around the south and west of the proposed development, lying adjacent to the parkland or in its setting for significant stretches of the route. The path users are highly sensitive to changes in view. The LVIA author assesses the visual impact from a number of viewpoints along this route, but does not carry out a detailed review of how the view would change along its length. I have undertaken this assessment at my **Annex X** where my visual assessment sits alongside the cultural heritage impact assessment of Ms Berezina. We describe how someone moves through the landscape along linear routes and gains a sequence of highly valued views

Section 5: Assessment of The Proposed Development

55. Section 5 of my evidence sets out my own assessment of the Appeal Scheme as a stand-alone proposal and in relation to allocations under STRAT 8 and STRAT 9 and the resultant cumulative impacts. I also make observations in relation to the **Site Selection** document (**CD 1.1.47**) and articulate my concerns that what appear to be viable alternatives should be reconsidered.

The Impact of the Proposed Development

56. This part of my evidence presents a summary of my conclusions reached relating to the likely significant and adverse changes that would be brought about through the development of the Site with the Appeal Scheme. Tables of effects, including comparative impact tables showing the LVIA assessment and my assessment are set out at **Annexes B, C and D**.
57. In **Annex C** (landscape character impacts) I identify that the landscape of the site comprises parts of the formal designed parkland and associated estate landscape of Nuneham Courtney.
58. I record that there would be substantial impacts over 7ha on the landform, through the creation of the site gravel bed and removal / regrading of the land with 0.5m or more of topsoil and subsoil from the Appeal Site.
59. I identify moderate to substantial impacts on the landcover through removal of the internal grazed vegetation and addition of uncharacteristic planting as part of the mitigation package. I identify substantial impacts on the cultural heritage of the site through impacts on the setting of the RPG, and direct impacts on the RPG. The magnitude of these impacts reflects those that would be brought about on the key characteristics of the receiving landscape.
60. The key characteristics of the **Parkland and Estate Farmland LCT (South Oxfordshire LCA (CD 5.4))** are also analysed in relation to the impacts the proposed development would have on each of the sets of features and patterns that combine to form these key

characteristics. Great play is made in the LVIA of the detracting features, mainly relating to the electricity infrastructure. However, my opinion is that when moving through this landscape, whilst very obviously present, the overhead lines and pylons are less dominant in the view than suggested. The wires appear to be overhead and do not visually compete with the parkland character that is so readily observed from the Oxfordshire Green Belt Way path. The Culham Campus perimeter fencing, whilst defensive in form and appearance, is becoming less austere through the redevelopment of the Campus under STRAT 8 and the regenerated spaces within the boundary fence appear to be far more attractive.

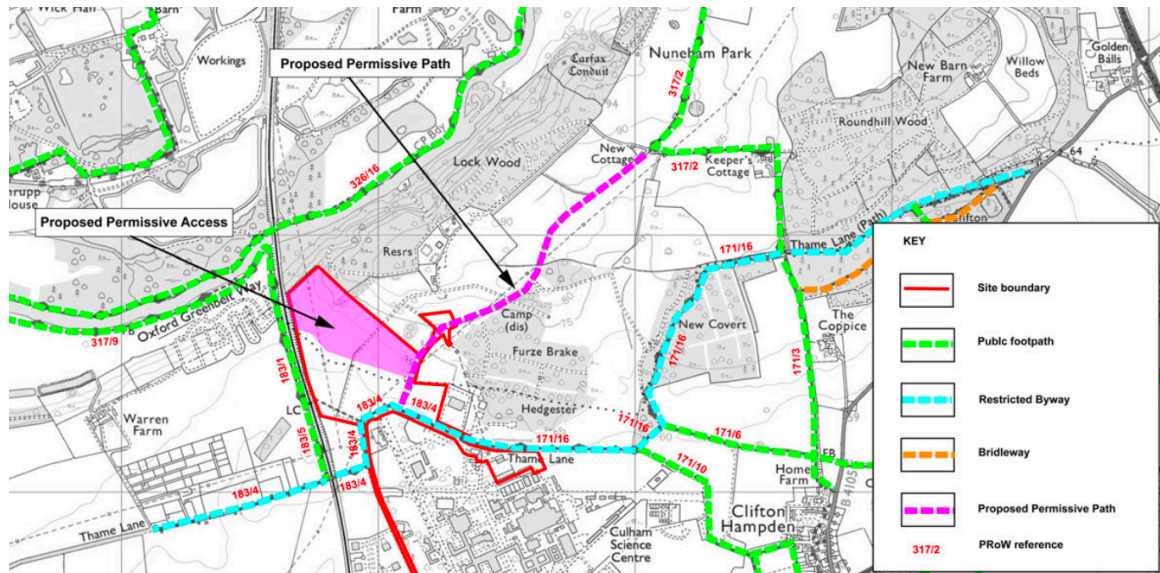
61. I have identified that the landscape does not have accommodating features to commend the Appeal Scheme to the site. The proposals would be discordant, detracting from the parkland character that flows down across the west-facing slope of the site towards the viewer. The mitigation proposed would introduce a number of elements not characteristic of the landscape. As a result, the clarity of the historic landscape patterns would be lost in perpetuity, as explored in more detail below.

Appropriateness of the mitigation proposed

62. This part of my evidence describes the context of the Appeal Site in relation to the Parkland Management Plan for the land in the ownership of the main Nuneham Estate and how the research undertaken as part of this parkland management plan informs my view that a more appropriate design for the highly sensitive landscape of the Appeal Site is required that is very different from the Appeal Site mitigation proposals. It also emphasises the fact that the site cannot accommodate a large-scale BESS scheme without substantial harm.
63. Firstly, the LVIA records that mitigation includes the creation of a permissive access route: LVIA paragraph 8.18. *If the development proceeds members of the public will have permissive access to the parkland greenspace within the application area and along a footpath route which will provide a connection between footpath 183/4 and 317/2, for*

the operational period of the facility (see **Figure 19, Appendix A**) extracted for ease of reference.

Figure 1: Extract from LVIA Appendix A Figure 19



64. The Nuneham Estate land manager is unaware of this proposal that crosses the private land owned by the Nuneham Estate. Accordingly, permissive access can only be delivered on the appellant's land and therefore the benefits of re-connecting the historic route as a permissive path cannot be counted into the scheme benefits.
65. The proposed fencing surrounding the public-facing sides of the BESS includes for a 4m high noise attenuation fence that would, for the 40-year duration of the scheme, surround the operational part of the site. This is not unique to the site and would be anticipated for any BESS scheme where noise attenuation / visual screening is required. However, because of the presence highly sensitive landscape or visual, and in this scenario both, receptors this essential part of the scheme would substantially harm landscape character and views.
66. This fence would become the dominant feature in the foreground, visually and perceptually competing with the parkland character. This is an essential part of the

scheme and would be seen from within the setting of the parkland at close-range for c 800m.

67. The proposed new fencing within the RPG parkland boundary is wooden post-and-rail.
68. The **Nuneham Estate Parkland Management Plan (CD 6.2)** records in relation to fencing (printed page 149): *The choice of fencing will be driven by historical precedent, aesthetic and stock/land management objectives. Where there is evidence of the original fencing, the same should be replicated where needed, as between gardens and park where iron estate fencing was used. For less visible areas and where there is no evidence of the historical fencing used, modern alternatives such as post and wire may be used if aesthetically appropriate.*
69. It is my opinion that post-and-rail fencing would be visually too heavy, and not aesthetically appropriate. Black metal parkland fencing would be the only appropriate choice, particularly given the original layout of the tree clumps on this parkland edge that would have been viewed from the principal access route along Abingdon Drive.
70. The proposed tree guards are equally heavy and do not demonstrate the finesse one would anticipate seeing in a Grade 1 RPG. Again, black metal parkland tree guards would be the only appropriate option for new planting of individual trees, with metal parkland fencing to the edges of clumps with individual bio-degradable tubes for each tree whip/transplant.
71. The planting plans are also discordant for the reasons set out below.
72. Firstly, the design of the landscape planting for the parkland and its setting needs to be co-ordinated with the Parkland Management Plan of the Nuneham Estate so that there is a coherent approach. This has not been undertaken.
73. Secondly, the design needs to ensure that, in perpetuity, the design is appropriate and not just about the screening of an inappropriate development in the setting of the parkland, and within the parkland itself.

74. The **Parkland Management Plan (CD 6.2)** Pdf page 163 records a reference to this important co-ordinated approach: *Investigate re-opening of Abingdon Drive as the main entrance into the park. Drive now crosses land outside ownership of the Estate so land may need to be bought or leased. If original alignment not possible, consider new entrance to the east of the science park, through the SE corner of the estate... This drive was always the principal drive into the park.*
75. The **Parkland Management Plan** also advocates on the Estate side of the boundary within field parcel 4 (FP4): *Create an informal broadleaf clump bordering the track/potential new access; remove all conifer and eyesores/rubble/building foundations and revert ground to grassland. Retain selection of best sycamore and field maple as the basis for the clump, and restock with oak, lime & sweet chestnut as required.*
76. In addition, the management plan includes for the removal of scrub.
77. The Appeal Scheme landscape proposals include for the planting of scrub. In the main the species identified, in the five-page landscape plan (**CD 2.3.7-11**), are appropriate as a shrub layer to create a skirt around tree planting areas to lend woodlands a warm understorey less open to wind and thus able to support birdlife etc. However, the inclusion of blackthorn in particular is at odds with good practice in terms of parkland restoration in a scenario similar to this. The location of the scrub is not justifiable in historic landscape terms being related to visually enclosing detracting views of the proposed development rather than working with the estate to create a co-ordinated approach.
78. The **Parkland Management Plan** advocates, through the detailed research undertaken by the authors into this particular parkland, the planting of English oak, sweet chestnut, small leaved lime, large leaved lime, Scots pine, Corsican pine & Douglas fir with a ratio of about 85-90% broadleaves and 10-15% conifer. I note that Capability brown did use silver birch and other short-term fast-growing species as nurse species to create a more instant level of cover, to then be replaced by the longer-term planting of the species listed above.

However, birch would have been an unlikely choice on a west-facing slope because it is more strongly associated with heathland and damp soil conditions.

79. In the **Parkland Management Plan** FP4, one of the closest parkland compartments to the Appeal Site has a management strategy of: *Plant 30-40 individual broadleaf trees scattered throughout parkland area: use English oak, sweet chestnut, small leaved lime, large leaved lime, Scots pine, Corsican pine & Douglas fir 100-150 trees. Position these informally to frame and give perspective and depth to long views across the parkland from the gardens to Black Wood and Windmill Hill. Do not use the Plan of Alterations by Brown and 1st edition OS map as a guide; these show trees retained from the boundaries in the early C18 landscape (see Robert Smith's map of Nuneham 1707), which are consequently in lines north-south across the landscape and tend to shorten and obscure views east from the gardens.*
80. We also learn from the Nuneham Estate **Parkland Management Plan Appendix A (CD 6.2.1)** that: *Brown's 1779 plan shows a parkland landscape with a lot of linear tree cover, of which he was not normally a fan; rather he preferred a more natural and visually-pleasing mosaic of clumps and individuals. The overlay of Robert Smith's plan of 1707 with Brown's Plan of Alterations 1779 (see Appendices, Drawing 1244-D-003) indicates that the linear elements of the tree cover in Brown's layout are inherited from the newly-formed parkland, which in turn incorporated them from the earlier 17th century layout of agricultural field boundaries and tracks.*
81. Therefore, what is proposed within the mitigation plan does not accord with the adjoining management plan or the historical context of the Site.
82. The Appeal Site landscape plan shows the following species: Sweet Chestnut and Oak which would accord with the parkland character, but Cherry and Birch (Sheet 1) are more agrarian.

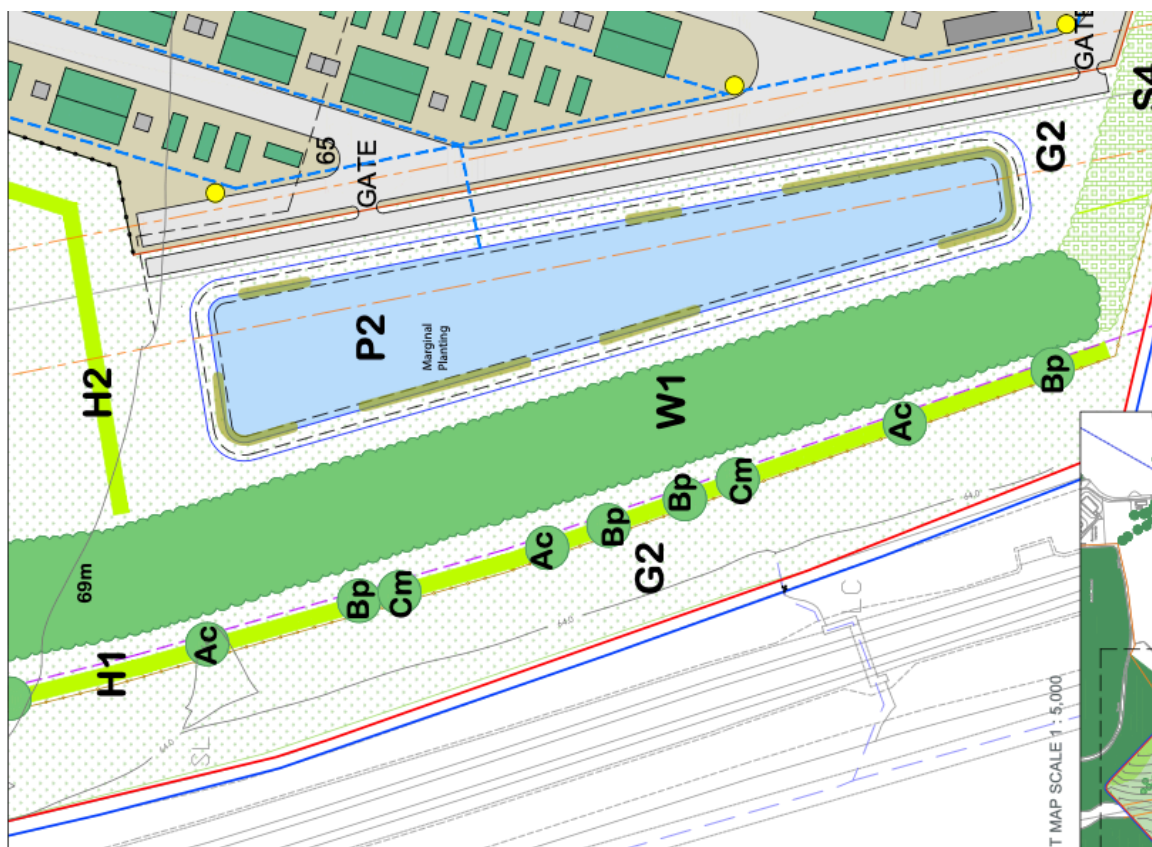
83. Taking the Appeal Site boundary-by-boundary:
84. The planning plan for the **southern boundary** shows a single line of birch, field maple and Hornbeam. The western side of the southern corner of the development shows an area of scrub planting c 10m deep.
85. The visualisation shows this planting montaged at 10 years. The level of screening effect shown in the visualisation is not achievable from this planting. The effect of the mitigation has been vastly overestimated. A walker heading towards the BESS scheme from Viewpoint 8 would see the acoustic fencing coming into the immediate foreground of the view with only minimal screening from one layer of planting. Multiple layers of planting would be required to gain the screening effect identified in the visualisation, and this would take closer to 20 years not 10 years, half the life of the scheme.

Figure 2: extract from Planting Plan Sheet 3 of 5 (CD 2.3.9) and View from Viewpoint 8 at 10 years (CD 2.3.12)



86. The planning plan for the southern end of the **western boundary, shown on Sheet 1 (CD 2.3.7)** shows a mixed species native hedge with individual birch, hawthorn and field maple closest to the railway line. The railway line is in cut here and effectively is screened from view. The users of the adjacent Oxfordshire Green Belt Way have near-uninterrupted views across the railway cutting over unenclosed pastures that rise up through a landscape with tree clumps and parkland woodlands on the skyline. Hedges are uncharacteristic in this landscape context.

Figure 3: extract from Planting Plan Sheet 3 of 5 (CD 2.3.9) and View from Viewpoint 4 at 10 years (CD 2.3.12)





87. On the site-side of this hedge is a woodland belt shown on the viewer-side (west) of the attenuation basin. This woodland, on maturity, will conceal all views of the historic parkland in its setting form users of the long-distance path. This will also create uncharacteristic landscape patterns.
88. The attenuation feature will not be visible in the main views in from the west. The boundary of the BESS compartment will be bounded by a 4m high acoustic fence. The visualisation in Viewpoint 4 shows this planting montaged at 10 years.
89. The planting plan for the northern end of the **western boundary, shown on Sheets 1 & 2 (CD 2.3.7 & 2.3.8)** shows a similar scenario albeit with a more oblique view of the acoustic fencing.
90. The level of screening effect shown in the visualisation in 10 years is not achievable from this planting. The effect of the mitigation has been vastly overestimated. A walker going along the Oxfordshire Green Belt Way parallel to the BESS, from the environs of Viewpoints 4 and 6, would see the hedge planting and woodland belt in the foreground of the acoustic fencing in the foreground of the view. These multiple layers of planting would give the screening effect identified in the visualisation at 20 not 10 years. The view of the parkland would be lost in perpetuity.

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Figure 4: extract from Planting Plan Sheet 3 of 5 (CD 2.3.9) and View from Viewpoint 6 at 10 years (CD 2.3.12)



Figure 5: extract from Planting Plan Sheet 2 of 5 (CD 2.3.8) and View from Viewpoint 14 at 10 years (CD 2.3.12)



91. The detailed landscaping proposals for the **eastern part of the site**, within the RPG, are shown on planting plan 4 (CD 2.3.10). This plan shows a woodland belt on the north-eastern side of the proposed BESS compound. Scrub is shown on the parkland facing side alongside a c 50m long and c 10m wide pond and individual tree planting within the parkland compartments.
92. The visualisation shows this planting montaged at 10 years. The level of screening effect shown in the visualisation is not achievable from this planting. The effect of the mitigation has again been vastly overestimated. The permissive path within the control of the appellant would be in the foreground of the view. A walker heading towards the BESS scheme from Viewpoint 14 would see the acoustic fencing in the foreground of the view in the early years with only minimal screening. The multiple layers of planting will gain

the screening effect identified in the visualisation, but in about 20 years. The character of the parkland would be lost. The long-range views interrupted in perpetuity.

93. The planning plan for the **eastern boundary** shows no planting on the site-side of the Site where viewed from the Oxfordshire Green Belt Way on the western side of the access track. A single line of hedge, is shown on the edge of the sub-station.
94. There are no viewpoints included from this part of the walking route. However, a walker would see the acoustic fencing and then the substation in the immediate foreground of the view with only minimal screening from one layer of planting. Multiple layers of planting would be required to gain a screening effect, and this would take 20 years.

Residual, Resultant Visual Impact

95. The **LEMP (CD 2.3.3)** records at paragraph 5.4 that the: *The Proposed Development will only be visible from a small area of countryside and this area of visibility will only become more constrained as an allocated urban expansion area is built out and as the buffer landscaping and buildings within it block views from the landscape further to the west and southwest. Visibility to the north and northeast is curtailed by rising ground and tree cover. The CSC and the part of the allocated urban expansion area on the east side of the railway, will block views from the wider landscape further to the south and southwest.*
96. 5.5. *The only significant receptors affected by the operational Proposed Development will be walkers on the Oxford Green Belt Way as they move along the west side of the railway and along Thame Lane as it skirts the CSC. The setting of the section of the Oxford Green Belt Way east of the railway is already significantly adversely affected by the existing electrical infrastructure and the CSC. The route is not an unpaved rural footpath but follows a broad concrete track which runs immediately adjacent to the CSC security fence. The proposed electrical infrastructure will be screened by a combination of earthworks, native tree, shrub and hedge planting and the acoustic fences. This will result in a loss of openness, but only for a short eight hundred metre section of the footpath as it passes through an existing urban fringe landscape. This will be compensated for by proposed permissive access to an extensive area of enhanced parkland, including access to a*

viewpoint which affords exceptional views over the Thames Valley towards Abingdon. An additional permissive footpath link will also be provided through the parkland to the north.

97. 5.6. It is concluded that overall, on balance, the Proposed Development will have at worst, a Neutral effect on visual amenity as adverse effects are offset by beneficial effects and ultimately it will have a net beneficial effect as the landscaping matures. It is likely that the landscaping proposed to minimise intrusion to users of the Oxford Green Belt Way will be effective within less than 10 years, while the landscaping to enhance the setting of the parkland will take 15 - 25 years. This is deemed acceptable because the creation of parkland landscapes has required patience throughout the centuries.
98. Fundamentally, for the reasons set out above I do not agree with these conclusions, particularly those I have highlighted (underlined).

Policy STRAT 8 & 9

99. Reference is made in the LVIA and other supporting documents to the allocation of the adjoining land for housing (STRAT 9) and employment (STRAT 8). This part of my evidence describes the context of the Appeal Site in relation to these allocations and resultant cumulative impacts.
100. I have set out my cumulative impact assessment at **Annex E**. The cumulative landscape and visual impacts through the addition of the BESS scheme would be significant.
101. Pdf page 48 of the **South Oxfordshire Local Plan 2011-2035 (December 2020) (CD 3.4.1)** sets out the background text to the allocation of land to the south of the site for employment use. Paragraph 3.68 states that: *The Council recognises the key role of the CSC site and supports and encourages its redevelopment. This site has been inset from the Green Belt as a result of this Plan. A masterplan should be prepared and agreed with the Local Planning Authority that will consider the future of the whole site. This approach to Culham is consistent with the objective to increase the number of high quality jobs in the district.*

102. Applications have already been received on the STRAT 8 site and parts of the Culham Campus are already under re-development. These changes are readily observed when walking the Oxfordshire Green Belt Way around the Culham Campus.
103. The indicative concept plan for both STRAT 8 & 9 on pdf page 50 shows the links proposed between housing and employment uses. STRAT 9 is a much larger area, 217ha, running west from the railway line with the Thames valley to the north and the Culham Road and railway station to the south. The allocation is for 3,500 homes. Placemaking principle v) sets out that: *a layout and form that respects the setting of the heritage assets within and beyond the site; in particular the listed buildings and structures (the Culham railway station and rail bridges and "Schola Europaea") and the Registered Park and Garden associated with Nuneham House;...*
104. The local plan, including this allocation, was adopted in December 2020. A comprehensive masterplan is in the process of being developed, and this allocation is planned, and any effects of the Appeal Site need to be considered in the context of this additional 3,500 homes being proximal to the site.
105. My assessment of the addition of the Appeal site to the baseline including 3,500 homes within a well-defined settlement are that the impact of the proposed BESS scheme, as seen from Viewpoints 4, 5 and 6 in particular would not just be afforded by users of the Oxfordshire Green Belt Way but by occupiers of the new settlement.

Site Selection and Alternatives

106. The LVIA author at paragraph 6.4 informs a reader that landscape was not a driving site-selection criteria. In the **Site Selection** document (**CD 1.1.47**) at paragraph 2.51 the author records that Identified Site 2 (IS2): *Overall, the site has been discounted because of its proximity to residential dwellings and greater distance from the point of grid connection. The site performs no better in heritage, landscape and or ALC metrics than the site proposed.* The 250m distance from the nearest dwelling (on the farthest south-eastern edge of IS2) is greater than the c 100m from the new settlement west of the Appeal Site.

107. The site selection document considers the four sites separately but does not consider parts of each combining. By combining parts of the different areas in IS1 and 2, and the parts of IS3 that do not form the setting to the parkland, the RPG areas and those closest to dwellings can be avoided. Notably, the land consented for 250MW in 2016 was not built out. Therefore, there have been, and appear to remain viable, less impactful, alternatives adjacent to the Culham Campus. Alternatives elsewhere are not explored, and the evidence tended by Mr Mark Reynolds at his Figure 4, page 42, tells us that a grid connection up to 13km distant can be viable.
108. The example alternative development options outlined above would not result in the level of harm to the landscape (including historic landscape) or to views from the Oxfordshire Green Belt Way route and would meet the placemaking principles set out in the STRAT 8 and 9 policies.
109. Therefore, how the Appeal Scheme development would be perceived from within the landscape has led me to conclude that the development would bring about substantial landscape and visual harm, and significant cumulative landscape and visual harm, that could be avoided through better site selection.

Section 6: The Impact of the Appeal Scheme on the Green Belt

110. In Section 6 I analyse the impact the Appeal Scheme would have on the purposes and openness of the Green Belt.
111. In section 6 also demonstrate that other options that I identify in Section 5 above would bring about less harm and would enable the quantum of battery storage to be accommodated without compromising the Green Belt purpose or landscape openness so significantly.
112. In setting out my evidence I draw on the existing landscape planning context and published Green Belt local plan evidence base, as well as the Green Belt (**CD 1.1.40**) submissions relied on by the Appellants as part of the appeal documentation.
113. The three aspects of the Green Belt that are in dispute will then be discussed, which are as follows:
 - Openness of the Green Belt.
 - Coalescence of settlements.
 - Encroachment into the countryside.
114. Reason for Refusal 1 recognises that the proposed development comprises inappropriate development, as defined by the **National Planning Policy Framework (NPPF)** (**CD 3.2.1**), and that permission can only be granted in what are deemed to be very special circumstances.
115. These very special circumstances are considered in the evidence of Mr Mark Reynolds.
116. Reason for Refusal 1 states that the benefits of the Appeal Scheme do not outweigh the harm caused to the openness of the Green Belt, and that it would bring about cumulative impacts with the planned 3,500 dwellings and employment allocations to the south and west of the Appeal site.
117. The **South Oxfordshire District Council – Delegated Report (CD 1.4.2)** very clearly articulates the case for the application, and this remains relevant for the Appeal Scheme,

bringing about unacceptable impacts on the openness of the Green Belt, the purpose in relation to safeguarding countryside in perpetuity and the cumulative impacts further impacting on the openness and purpose of the Green Belt in light of the STRAT 8 & 9 allocations:

118. *7.7. Policy STRAT6 of the Local Plan sets out that the Green Belt will be protected from harmful development and development will be restricted in accordance with the NPPF. Point Two of the policy also makes provisions for the alterations to the Green Belt boundary as set out in the strategic policies, and that this development should deliver compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. This demonstrates the Local Plan's clear focus on protecting the remaining Green Belt.*
119. *7.8. The applicant has provided a Green Belt Assessment of the proposals and a Landscape and Visual Impact Assessment (LVIA). It sets out that the built area of batteries and substation, which will utilise an area of circa 7 hectares, will be located in the southern part of the proposal site and adjacent to the land recently removed from the Green Belt by the Local Plan. Landscaping features have been proposed with the aim of screening the BESS and enhancing the setting of the Registered Park and Garden (RPG). Detail on the impact to the RPG is given in the heritage section. These features included:*
- New hedgerows around the battery compound;*
 - New woodland planting along the western boundary and to the north of the substation building; and*
 - New tree belts in the north and along the boundary with the battery compound set in new scrubland.*
120. *7.9. The applicant's Green Belt Assessment states it recognises that there will be a spatial impact from the proposals, but it considers this is a limited developed area of the site and the comparative loss of openness would be small when comparing to the adjacent Local Plan strategic allocations. The Local Plan removed nearly 800 hectares of land from the Oxford Green Belt, with the strategic allocations at Culham comprising nearly 300*

hectares of this. This significant area of land removed from the Green Belt heightens the importance of the remaining Green Belt land in fulfilling its designated function. The argument that this development would be small in comparison is not persuasive, as it could be replicated for any development that is smaller than that which is set out in the Local Plan. The impact on the spatial and visual openness of the Green Belt by these proposals is what is required to be considered. Spatially, this would be an urbanising development of circa 7 hectares on agricultural fields in the Green Belt.

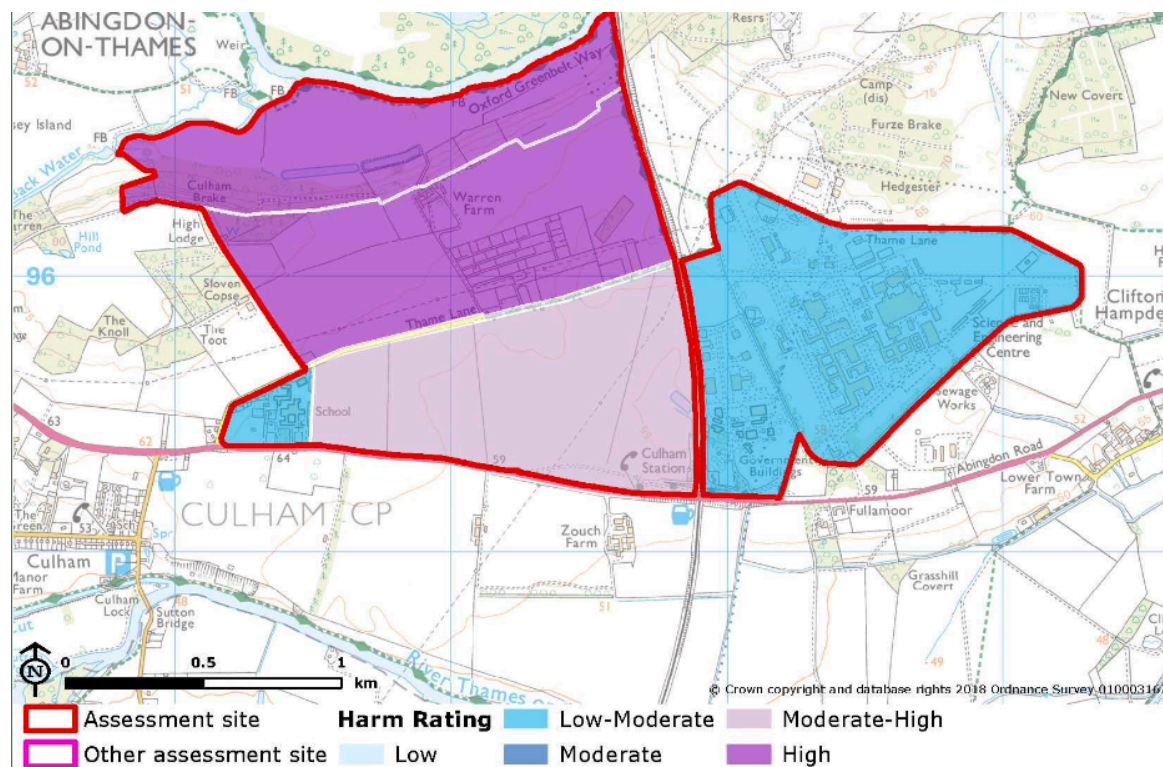
121. 7.10. In terms of proposals for mitigating the visual impact the assessment explains that a key part of the proposals is the screening, which will mean that views of the proposed buildings will be limited. Particularly from within the Green Belt from the North and East, this is considered to limit the impacts to the openness of the Green Belt. There are also proposed landscape enhancements in the northeast of the proposed site and within the listed RPG. In terms of landscape, the applicant's Green Belt Assessment considers that these landscape enhancements will provide a landscape benefit. Conversely, the Landscape Officer has concluded that the proposals would result in a loss of visual openness of the Green Belt, with further detail discussed below.
122. I fully concur with the judgements set out in the Designated Report.
123. The Delegated Report author also articulates that:
124. 8.11. Overall, the Council consider the adverse effects of the development to be greater than stated. The Council also consider the impact on the visual openness of the Green Belt to be underestimated. The site can be appreciated as an open landscape in views from a considerable length of the Greenbelt Way and from the eastern edge of the residential allocation. The development and associated mitigation will block view with the proposed tall structures remaining visible in the long term. This would result in a distinct loss of visual openness. It would also result in significant adverse impact to the landscape character within a registered parkland as well as to views from a long-distance path. The mitigation proposed adjacent to the long-distance path is inadequate, with limited set

back and boundaries left open or with minimal planting whilst the noise fencing would also be intrusive.

Published Evidence Base

125. The most recent evidence base document relating to the Site is the **Green Belt Assessment of Strategic Sites in South Oxfordshire Prepared by LUC December 2018 (CD 3.4.5)** that follows on from the **Oxford Green Belt Study also prepared by LUC and completed in October 2015 (CD 3.4.4).**
126. This second document was commissioned to appraise eight potential development sites within South Oxfordshire, including the allocation at under Site 8 - Culham, against the five nationally defined purposes of the Green Belt as set out in the NPPF. It also draws conclusions on the relative harm (or otherwise) to the Green Belt that may result from their potential release for development.

Figure 6: Extract from Assessment of Strategic Sites in South Oxfordshire pdf page 83:



127. This document scores the contribution to the five purposes of the Green Belt of the land to the west and south of the Appeal Site, concluding that the land to the west of the

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Appeal Site is of the highest rating based on its role in safeguarding the countryside from encroachment pdf page 82:

128. *Culham Science Centre and Number One Site - Development in the western part of this parcel (Culham Number One Site) is relatively low in density, and does not have a significant urbanising influence on the wider countryside, but it has a stronger association with the adjacent Science Centre than with the open land to the west of the railway line. The Science Centre is more densely developed, but still retains sufficient openness to make some contribution to this Green Belt purpose. Europa School and adjacent dwellings - In isolation these are not of a scale or density to represent a significant urbanising influence.*
129. As a result, paragraph 4.12 identifies that: *Away from Oxford a 'high' or 'moderate-high' level of harm would result from any sizeable encroachment in open countryside – i.e. at Culham or Berinsfield – although less harm would result from release of the existing development at Culham Science Centre and the adjacent Culham Number One Site.*
130. The overall aim of the **Oxford Green Belt Study also prepared by LUC and completed in October 2015 (CD 3.4.4)** was to assess the extent to which the land within the Oxford Green Belt performs against the purposes of Green Belts, as set out in the NPPF:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
131. The document preface identifies that the brief indicated that the Study should examine the case for including within the Green Belt any additional areas of land that currently lie outside it. The NPPF attaches great importance to Green Belts and stresses that their essential characteristics are 'openness and permanence'. It also advises that, once

established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of a local plan.

132. The ratings that were applied to each criterion, as follows:

- High - Parcel performs well.
- Medium - Parcel performs moderately well.
- Low - Parcel performs weakly.
- N/C - No Contribution Parcel makes no, or a negligible contribution.

133. The Appeal Site lies in Broad Area 6 that performed:

- Purpose 1: N/C
- Purpose 2: Low
- Purpose 3: High
- Purpose 4: High

134. This LUC report was reviewed and updated in 2024 (**CD 3.4.7**). The findings for Broad Area 6 are unchanged. Paragraph 3.8 identifies the importance of the remaining Green Belt areas around settlements including the new settlement at Culham:

135. *The parcels originally defined in Oxford Green Belt Study (2015) have been appropriately redrawn to exclude and surround these new inset areas. The insetting at Berinsfield, Culham Science Centre and Shippon/Dalton Barracks within the Green Belt has also resulted in the need for the creation of parcels surrounding these new inset areas for consistency with the Oxford Green Belt Study (2015) methodology. All settlements inset from the Green Belt were defined in the Oxford Green Belt Study (2015) as 'neighbouring towns' of relevance to the assessment of contribution to Green Belt Purpose 2. The insetting and expansion of Berinsfield, Culham and Shippon therefore qualifies them for definition as neighbouring towns.*

136. Broad Area 6 is reviews in the 2024 document (**CD 6.7**) and the Appeal Site lies in parcel CH2.

137. The detailed assessment **LUC Report 2015 (CD 3.4.3)** identified that the broad areas contribution to the five purposes of the Green Belt were:

Purpose 2: To prevent neighbouring towns merging into one another or into neighbouring smaller settlements

138. Rating: Low *The parcel partially lies on the periphery of two settlement gaps: one to the north between Radley and the now inset Culham Science Centre and the associated adjacent strategic site allocation (SLP045 – Land adjacent to Culham Science Centre), which together represent a new neighbouring town in the Green Belt, and one to the east between Berinsfield and the new inset settlement, both of which result in some low contribution to this purpose. The parcel is open and generally well screened, apart from in the south west and south east where it abuts Culham Science Centre. However, the parcel's outer edges do not lie much closer to the neighbouring settlements than the existing urban edge of Culham Science Centre to the south of the parcel and the planned urban edge of the land to the west of the railway line. Furthermore, the high wooded ground of Lock Wood and the River Thames beyond to the north and the woodland in the east of the parcel represent strong separating features.*
139. The Appeal Site similarly has a low rating in relation to this role. The role of the land rising up from the railway line to the well-wooded skyline with parkland features will be even more important in providing strong separation features once STRAT 9 has been developed.

Purpose 3: To assist in safeguarding the countryside from encroachment

140. Rating: High *The parcel lies to the north of Culham Science Centre and is comprised of agricultural land and woodland, including the sloping Lock Wood on the edge of the River Thames in the north of the parcel. The parcel is open apart from a warehouse in the south and a reservoir and ancillary buildings in the north. It shares open views with the surrounding countryside, particularly to the west from the high ground within the parcel. The large buildings within Culham Science Centre to the south are visible from within the*

parcel, but tree cover and rising land in the parcel maintains distinction from the newly inset urban area

141. Therefore, the Appeal Site is key in maintaining the undeveloped open land distinction between the proposed new housing and the skyline including the parkland, and has a high rating.

Encroachment into the Countryside

142. The Appeal Site displays a strong and unspoilt rural character based upon my own field observations of the Site's current and future urban context.
143. There are currently open views across the Appeal Site to the wider countryside from the Oxfordshire Green Belt Way across the Site, and I consider that the urbanising influences on the actual Appeal Site from the Culham Campus and electricity infrastructure, whilst evidently present, do not impact on the appreciation of the openness of the site and are therefore limited.
144. The Council's planning officers address the matter of encroachment in paragraph 20.2 of the **Delegated Officer Report (CD 1.4.2)**.
145. *20.2. In accordance with the NPPF substantial weight is given to the harm to the green belt, which is the harm the proposals would cause to the openness of the green belt by the encroachment of development into the countryside. The development will result in harmful spatial and visual impacts to the Green Belt, as identified above, contrary to Policies STRAT6 and DES9 of the Local Plan.*
146. The officer recognised that the development would lead to the loss of an expanse of rural pastoral and parkland character, more than just undeveloped fields. The proposed development would not extend an impact on the openness of the Green Belt beyond the existing and planned (STRAT 8 & 9) built development limits, thus encroaching on the countryside.

147. The officers conclude that the effects of the Appeal Scheme upon the Green Belt would be substantial and that there would be a high level of conflict with the third purpose of the Green Belt.
148. This is consistent with my findings, and specifically the judgements set out in my own landscape and visual Impact assessment Tables at **Annex B, C, D** and **E** in the site visit route and analysis of views in **Annex X**.
149. I conclude that the greatest adverse landscape impact would be on the appreciation of the Appeal Site as being open sloping transitional land from the pastoral estate farmland over the rising slope forming part of the historic parkland and its setting.
150. This view is supported by the pre-application consultation response issued by the Council (**CD 1.5.1**), which includes the following statement (pdf page 4): *Having regard to the quantum, scale, massing and height of the proposal and associated works, the council considers the proposal constitutes inappropriate development in the Green Belt. The site character would change from an open, rural historic landscape to an industrial battery facility. Batteries, structures and bunds would lead to a loss of visual openness as well as spatial openness. Furthermore, the harm to the Green Belt and the countryside in this location, having regard to the sensitive historic and unbuilt character of the site, is very unlikely to be outweighed by other considerations. However, limited information has been submitted to assess the suitability of the land having regard to the objectives of Green Belt. Moreover, an assessment to demonstrate very special circumstances has not been submitted for consideration.*
151. For these reasons, including considering the changes between the Application Scheme and the Appeal Scheme, I consider that the conflict with the third purpose of the Green Belt would be high.
152. The significant urbanising influence of the Culham Campus area, in combination with the STRAT 8 and 9 allocations places far greater importance on the Appeal Site remaining open. This openness is enhanced through the lie of the land and the way views from within the Green Belt, especially from the Oxfordshire Green Belt Way and from the

future housing environs, rises up to the parkland edge and wooded skyline creating the impression of space and openness.

153. The rating of the Appeal Site in safeguarding the countryside from encroachment is high.

Purpose 4: To preserve the setting and special character of historic towns

154. Rating: Low *The parcel consists of agricultural land and tree cover. There is no intervisibility with Oxford but it forms part of the undeveloped Thames Valley landscape that extends all the way into the centre of the city, thus giving it a relationship with Oxford that relates to one of the key elements of its special character. However, distance does limit the extent of this contribution.*
155. The Appeal Site, being on the west-facing slopes below the main parkland ridge makes a lower contribution to the purpose of preserving the setting and special character of historic towns. Accordingly, the rating is low.
156. I therefore find that the Appeal Site cannot be released from the Green Belt for development without substantial harm to the wider Green Belt, and the purpose of safeguarding the countryside from encroachment. The proposed vegetation forming part of the Appeal Site mitigation would also create inappropriate scrub, hedge and woodland encroachment into the area, detracting from the estateland and parkland character, and that the Appeal Site represents an example of 'strong unspoilt rural character' with very specific historic landscape associations.
157. The Appeal Site is likely to be influenced by the adjacent settlement allocation and the important role this open land plays will be given greater emphasis once 3,500 dwellings occupy land to the west.
158. The Appeal Site development would exert both landscape character, visual and auditory disturbance upon its character.

Effects upon the Openness of the Green Belt

159. The concept of openness of the Green Belt is addressed within paragraph 142 of the **National Planning Policy Framework (CD 3.2.1)**, which states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and that the essential characteristics of Green Belts are their openness and their permanence.
160. It is important to consider the approach taken by **Sales LJ in Turner v Secretary of State for Communities and Local Government [2016] EWCA Civ 466 (paragraph 14) (Appendix A)**, who states that: *The concept of ‘openness of the Green Belt’ is not narrowly limited to the volumetric approach suggested by [counsel]. The word ‘openness’ is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs...and factors relevant to the visual impact on the aspect of openness which the Green Belt preserves.*
161. The matter of openness is also dealt with by the Supreme Court in the Judgement of Lord Carnwath (with whom Lady Hale, Lord Hodge, Lord Kitchen and Lord Sales agree) in **R (on the application of Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council (Appellant) [2020] UKSC 3 (Appendix B)**, in which at paragraph 22 openness is identified as a ‘*broad policy concept*’. It is described broadly as the: *counterpart of urban sprawl*, and it is identified as being: *linked to the purposes to be served by the Green Belt*.

Loss of physical openness

162. As noted above in relation to the **Green Belt Assessment of Strategic Sites in South Oxfordshire Prepared by LUC December 2018 (CD 3.4.5)**, there is very little developable area within the district that is not covered by the Green Belt and it is therefore inevitable that there will be some loss of physical openness in order to maintain a sustainable supply of housing within the district. In this context, the Council’s Green Belt Strategic Sites Review (**CD 3.4.5**) has assessed the land west and south of the Appeal Site and found that

its removal would cause more than localised harm to the Green Belt, but that it performs better than some sites considered adjoining the main Oxford urban area.

163. My own assessments of the Appeal Site have determined that it makes a substantial contribution to the safeguarding the countryside from encroachment purposes of the Green Belt, and that when it is surrounded by settlement to the west and south, it will occupy an urbanised context, and the form of the Appeal Site is such that its development is likely to be perceived as being particularly industrial and intrusive in terms of the Green Belt and discordant with the settlement function and aspects.
164. It is recognised that the Appeal Site development design has sought to mitigate this through the addition of woodland, scrub and other planting. The inappropriateness of this is a separate concern. However, it is nevertheless the case that a loss of physical openness will occur, albeit local to the Site. But, given the quantum of proposed battery storage development, the level of harm to physical openness is in my opinion considered to be significant. My colleague Mr Mark Reynolds deals with the policy context of this loss of physical openness in his proof of evidence.

Loss of Visual Openness

165. In terms of the visual aspects of openness, I have concluded that views of the Site are highly valued and will become appreciated by more people through the development of the settlement allocation. There are important views of the Appeal Site from a long section of the Oxfordshire Green Belt way Public Rights or Way and there will be further views from publicly accessible spaces and the very sparse vegetation on the western side of the railway line and west of the Appeal Site boundary serves to do very little to filter inward views from the surrounding countryside. The sense of openness across the railway line towards the Appeal Site, and from the Culham Campus towards the Appeal Site is high and valued highly. The mitigation of the western boundary, which forms part of the landscape design for the scheme, will further disrupt this openness.
166. It is therefore the case that the Appeal Site's visual relationship with the wider Green Belt is, whilst in some respects limited, important. It shares a strong visual relationship with

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the adjacent new urban settlement area, with the Oxfordshire Green Belt Way and therefore notable effects upon the visual openness of the Green Belt are anticipated to be appreciated by a large population and from highly valued and highly sensitive viewers and will not be limited to the Appeal Site itself.

Sections 7: Overall Assessment of Reason for Refusal 1

167. In Section 7 I set out my conclusions, based on my assessment above, reviewing the proposals against the policies set out in Reason for Refusal 1.
168. Whilst there is analysis underpinning the allocation for development of around 3,500 dwellings (STRAT 9) being able to be accommodated in an adjacent part of the landscape, there is a requirement to protect the Green Belt a purposes and openness, and to protect the landscape of the RPG and it's setting from harm.
169. Accordingly, with regard to the harm identified in the Reason for Refusal 1, the following landscape and visual matters have been considered:
170. The extent to which the Appeal Scheme would be harmful to the spatial and visual openness of the Green Belt. I have concluded that the harm would be substantial.
171. The extent to which the Appeal Scheme would conflict with the purposes of the Green Belt. I have concluded that the proposed Appeal Scheme would impact substantially by way of the encroachment it would incur into the countryside.
172. The extent to which the proposed development would result in adverse cumulative impacts on the Green Belt purpose and openness and how the Green Belt function of the site is of higher importance in relation to the removal of the Green Belt from allocated strategic sites for development. In this regard I have concluded that the Appeal Scheme would bring about significant adverse impacts on the Green Belt purpose and openness and how the Green Belt functions. The land of the Appeal Site is of higher importance because of the function it plays in maintain openness over a smaller area now that the land to the south and west has been allocated. The importance of it remaining undeveloped is now higher in relation to the removal of the Green Belt from allocated strategic sites for development.
173. I consider that the Appeal Site development is inappropriate development in the Green Belt.

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174. I consider that the Appeal Scheme would be harmful to the spatial and visual openness of the Green Belt and would conflict with the purposes of the Green Belt.
175. I consider that this site additionally provides an important Green Belt function in relation to strategic sites removed from the Green Belt for development.
176. Additionally, my colleague Mr Mark Reynolds identifies through his analysis that the application does not constitute very special circumstances as required by the National Planning Policy Framework to outweigh the substantial harm to the openness of the Green Belt.

Section 8: Assessment of Reason for Refusal 1 against Policy

177. In Section 8 I set out my conclusions, reviewing the proposals against the policies set out in Reason for Refusal 1.
178. Firstly, I consider that the proposed development would bring about substantial harm to the openness of the Green Belt. As such, the proposal is contrary to the NPPF for the reasons set out in Section 7 of my evidence.
179. The proposals would result in a substantial and readily appreciable loss of visual openness in the Green Belt, contrary to Policy STRAT6 of the South Oxfordshire Local Plan 2035.
180. Policy DES9 of the South Oxfordshire Local Plan 2035 sets out support for schemes delivering renewable and low carbon energy generation and associated infrastructure. This is provided they do not cause significantly adverse effect on areas including:
- landscape, both designated AONB and locally valued, biodiversity, including protected habitats and species and Conservation Target Areas,
 - the historic environment, both designated and non-designated assets, including development within their setting, and
 - openness of the Green Belt.
181. The Appeal Scheme would conflict with this policy and cause significantly adverse effects, including cumulative effects, on a valued landscape, views from highly sensitive visual receptors, including users of the Oxfordshire Green Belt Way and future occupiers of STRAT 9 houses, and substantially impact on the perception of the openness of the Green Belt.

Section 9: Overall Assessment of Reason for Refusal 2

182. In section 8 I analyse the Appeal proposals in relation to Reason for Refusal 2.
183. With regard to the harm identified in Reason for Refusal 2, the following landscape and visual matters have been considered within my proof of evidence:
184. I have set out in Section 4 why I consider that the site provides a valuable transition between the registered parkland and the Culham Science site.
185. I consider that the battery storage is large scale, would be industrial in appearance, and would introduce an urban industrial development into this important area of rural countryside.
186. I identify through my analysis that the Appeal Scheme would result in significant adverse effects on the landscape character and to views including those from public rights of way. I set out why I consider that the proposed mitigation is ineffective in mitigating this harm.
187. I have considered the extent to which the proposed battery storage, which is large scale, would be industrial in appearance, and would introduce an urban industrial development into an important area of rural countryside, and concluded that the impacts would be substantial. I conclude that the BESS scheme as a whole, including the proposed mitigation, would create inappropriate patterns, particularly in relation to the estateland and parkland character that is highly valued. The character of a battery storage development is such that in a highly sensitive location like the Appeal Site, the development would introduce industrialised characteristics into an otherwise pastoral and parkland character.
188. I have considered the extent to which the proposed development would impact on the landscape character and views of the valuable transition between the registered parkland and the Culham Science site. I have concluded that the Appeal Scheme would cause significantly adverse effects, including cumulative effects, on a valued landscape.
189. I have analysed the extent to which the proposed development would impact on views from highly sensitive visual receptors, including users of the Oxfordshire Green Belt Way

and future occupiers of STRAT 9 houses. I have concluded that the proposed development would result in significant adverse effects on the landscape character and to views including those from public rights of way, especially users of the Oxfordshire Green Belt Way.

190. I have articulated in detail in Section 5 why I consider that the proposed mitigation would be ineffective in mitigating this harm and would create adverse impacts in their own right.
191. In consultation with Ms Berezina, I have assessed the extent to which the proposed development would impact on the landscape and visual perception of the designated PGR landscape and its setting from a STRAT 9 resident or Oxfordshire Green Belt Way user and concluded it would be substantially adverse not just for the life of the scheme, but in perpetuity.

Section 10 Assessment of Reason for Refusal 2 against Policy

192. In Section 10 I also set out my conclusions, reviewing the proposals against the policies set out in Reason for Refusal 2.
193. I reviewed the landscape officer consultation responses at both the pre-app and post application stages and in my Proof have described how, as articulated by the district landscape officer Hazel Osborne, in my opinion she is correct in identifying that the detailed proposals do not respond sufficiently to the local landscape character around the Appeal Site. In doing so I have articulated the level of harm the development would have on the locality relative to a scheme in a better located and more accommodating part of the landscape.
194. I have set out the extent to which the proposals would be incompatible with the designated landscape patterns and character, and how the illustrative mitigation measures incorporated, as shown on the landscaping plans, whilst relatively extensive, are inappropriate and thus not in accordance with policies ENV1, DES1 and DES2 of the South Oxfordshire Local Plan 2035, and Policy CUL5 (Design Code for Culham) of the Culham Neighbourhood Plan
195. The Appeal Scheme would conflict with these policies and cause significantly adverse effects, including cumulative effects, on a valued landscape, views from highly sensitive visual receptors, including users of the Oxfordshire Green Belt Way and future occupiers of STRAT 9 houses, and substantially impact on the perception of the openness of the Green Belt.
196. In terms of **Policy ENV1**, the proposed development would be in breach of part 2, in so far as the Appeal Scheme would be harmful development and would substantially impact on South Oxfordshire's landscape in LCA 7D (formerly LCT15), creating harmful urbanising development and introducing discordant landscape patterns into open countryside in a rural area where the policy seeks to protect the landscape from harmful development. The proposed development will not protect features that contribute to the nature and quality of South Oxfordshire's landscapes, in particular:

197. i) In terms of trees (including individual trees, groups of trees and woodlands), hedgerows and field boundaries; the proposed development will introduce discordant patterns that will remove the open character of the lower pastoral estateland/ parkland and change the landscape perception from one of parkland to one of woodland in the very long term.
198. ii) In terms of irreplaceable habitats such as ancient woodland and aged or veteran trees found outside ancient woodland; the proposed development will disrupt the patterns of historic parkland on the site. There will be no direct loss of these habitats, however, the development does not take account of the parkland history and is located in a landscape setting that is too sensitive to be able to accommodate the proposed development.
199. iii) The proposed development will impact on the appreciation of a highly valued landscape that can be appreciated in a sequence of views from the Oxfordshire Green Belt Way taking a viewer through the landscapes, waterscapes, cultural heritage and user enjoyment of the River Thames, its tributaries and flood plains. The impact will be appreciated most on the cultural heritage value of parkland views afforded from the route.
200. iv) other watercourse and water bodies; The proposed development will introduce discordant patterns. The upper wildlife pond is on higher ground and will appear to be badly sited. The lower attenuation basin is for chemical leak containment purposes and will have no wider landscape benefits.
201. vi) In terms of topographical features; the proposed development will bring about a substantial and adverse change to the perception of the landscape of the western slope of the Nuneham plateau and parkland, and strongly linked to this, the Appeal Scheme will bring about substantial and adverse impact on the vii) areas or features of cultural and historic value; as articulated in my evidence.
202. viii) Fundamentally, the proposed development will impact on important views and visually sensitive skylines; and the Appeal scheme will bring about a substantial and adverse change to the perception of the parkland when viewed from the Oxfordshire Green Belt way and housing in the STRAT 9 allocation area.

203. ix) The appeal scheme will also impact on the and perceptual factors of the landscape such as tranquillity, wildness, intactness, rarity and enclosure. The Grade 1 RPG parkland is rare, whilst electricity infrastructure is present in the landscape the integrity of the parkland and its overarching character, quality and value is currently readily appreciated. The openness of the views afforded of this as an undeveloped site in this context is high. The Appeal Scheme will substantially and adversely impact on this aspect of landscape.
204. **Policy DES1**, sets out that (Part 1) all new development would be high quality. For the reasons set out in my proof I do not consider that the site is suitable for the proposed BESS scheme and that the mitigation employed to try to make a bad design fit would bring about additional adverse impacts.
205. Part 2 of the policy requires that where development sites are located adjacent to sites that have a reasonable prospect of coming forward in the future, integration with the neighbouring site should form part of the proposal's design. STRAT 9 will be developed in the coming decade and the proposed development would bring about substantial, significant adverse cumulative landscape and visual impacts.
206. In relation to enhancing local character, **Policy DES2** requires that (1.) all new development must be designed to reflect the positive features that make up the character of the local area and should both physically and visually enhance and complement the surroundings. For the reasons set out above and already articulated in my proof of evidence, proposed development would bring about substantial impacts in this regard that would be adverse.
207. Part 2 requires that all proposals for new development should be informed by a contextual analysis that demonstrates how the design:
208. i) has been informed by and responds positively to the site and its surroundings; and
209. ii) reinforces place-identity by enhancing local character.
210. Neither of these criteria have been met and the proposed appeal site development would impact adversely on the surroundings and create discordant patterns in the long term that would mask the highly valued views of parkland features.

211. Part 3. requires that where a Character Assessment has been prepared as part of a made Neighbourhood Development Plan, a proposal must demonstrate that the positive features identified in the Assessment have been incorporated into the design of the development.
212. Part 4 records that in the absence of a local landscape character assessment a comprehensive contextual analysis of the local character should be prepared as part of an application. This should identify the positive features that make up the character of the area. The proposal must demonstrate that these positive features have been incorporated into the design of the development.
213. The proposed development will bring about substantial impacts that adversely affect the landscape and views of the landscape, and, for the reasons set out in the main body of my proof of evidence, the scheme does not meet with this part of the policy.
214. **Policy CUL5** (Design Code for Culham) of the **Culham Neighbourhood Plan (CD 3.4.2)** identifies that: *Development proposals in Culham will be supported provided they have full regard to the essential design considerations and general design principles set out in the Culham Design Code attached as Appendix B.*
215. The supporting text records that the policies require that proposals, such as the Appeal Scheme, demonstrate, that full regard has been paid to the Code and that any new development demonstrates a connection with local character and place making.
216. The Neighbourhood Plan references the 2017 LCA (**CD 5.4**) landscape character types and key characteristics and has design codes for outside of the settlement.
217. Joint Design Guide: Ensure: *A contextual analysis including an opportunities and constraints plan (which will inform your design rationale) of the wider and immediate site context has been prepared.*
218. In relation to place and setting: *A contextual analysis should identify existing networks of natural features, including watercourses, trees, woodland, hedgerows, green spaces, field patterns, habitats and public rights of way (footpaths, bridleways, etc.)*

219. In relation to the natural environment, the design code on printed page 66 records: *The site layout should respect its physical features and those of its adjacent land including its topography, orientation, landform, geology, drainage patterns, field patterns/boundaries and vegetation cover, for example.*
220. Stating at 2.1 that development: *retains and strengthens the site's landscape features; using the physical features of the site and results of technical studies positively and imaginatively in its design.*
221. In relation to built form the Joint Design Guide is to: *Respect the local context whilst striving for excellence in architectural quality and sustainability.*
222. For the reasons set out in my proof, none of these Joint Design Guide criteria would be met.
223. Accordingly, the extent to which the proposal is therefore contrary to the NPPF, and Policies ENV1, DES1 and DES2 of the South Oxfordshire Local Plan 2035, and Policy CUL5 of the Culham Neighbourhood Plan is substantial.
224. Further, this proposal, in addition to the development on allocated sites STRAT8 and STRAT9, will create an increased cumulative impact harmful to the landscape character of the area, contrary to Policies ENV1, DES1 and DES2 of the South Oxfordshire Local Plan 2035.
225. I have explored the extent to which the proposals would harm the character and setting of the landscape and erode the rurality of the setting of the RPG particularly when viewed from the Oxfordshire Green Belt Way approaches, thus not according with the Development Plan as a whole. I also consider how the development of the site fails to deliver sufficient meaningful multi-functional GI gains.
226. My proof of evidence therefore identifies why in my view the reasons for refusal 1 and 2 can be robustly supported. I draw the conclusion that the development of the Site would disrupt the highly valued and sensitive landscape patterns and impact on highly valued views in an unacceptable way, would impact on the purposes of the Green Belt and

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unnecessarily impact on openness particularly considering that there are alternatives that would not adversely impact in so great a way.

227. Noting in my evidence that it is for others to determine how much weight each policy contravention should be awarded in the planning balance.

Anne Priscott (CMLI)

May 2025