

---

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED), SECTION 78**

**THE TOWN AND COUNTRY PLANNING APPEALS (DETERMINATION BY INSPECTORS) (INQUIRIES PROCEDURE) (ENGLAND) RULES 2000 (SI 2000/1625) (AS AMENDED)**

Appeal by Culham Storage Ltd, against the decision of South Oxfordshire District Council to refuse to grant Planning permission for the:

‘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.’

AT: Land to the north of the Culham Science Centre, Thame Lane near Clifton Hampden, OX14 3GY

Planning Inspectorate reference: APP/Q3115/W/24/3358132

South Oxfordshire District Council reference: P24/S1498/FUL

**HERITAGE**

**PROOF OF EVIDENCE OF SASHA BEREZINA ON BEHALF OF SOUTH OXFORDSHIRE DISTRICT COUNCIL**

# TABLE OF CONTENTS

1.	INTRODUCTION .....	3
2.	APPEAL SITE .....	5
3.	THE DEVELOPMENT .....	6
	<i>Application Scheme .....</i>	<i>6</i>
	<i>Refusal Reason 3 – Heritage Impacts.....</i>	<i>7</i>
	<i>Heritage consultees comments to date.....</i>	<i>7</i>
	<i>Appeal Scheme amendments .....</i>	<i>8</i>
4.	STATUTORY DUTIES, PLANNING POLICY AND GUIDANCE .....	10
	<i>Planning (Listed Buildings and Conservation Areas) Act 1990.....</i>	<i>10</i>
	<i>The development plan - The South Oxfordshire Local Plan 2035.....</i>	<i>10</i>
	<i>National Planning Policy Framework (NPPF) .....</i>	<i>13</i>
	<i>Planning Practice Guidance (PPG).....</i>	<i>14</i>
	<i>The Setting of Heritage Assets (Historic England December 2017) .....</i>	<i>15</i>
	<i>Conservation Principles, Policies and Guidance (Historic England, April 2008) .....</i>	<i>17</i>
5.	THE SIGNIFICANCE OF THE RPG AND HISTORIC DEVELOPMENT OF THE SETTING.....	18
	<i>South Park And South (Abingdon) Drive.....</i>	<i>21</i>
	<i>Road to Culham Train Station .....</i>	<i>28</i>
	<i>Abingdon Lodge.....</i>	<i>30</i>
	<i>Tree Belts and Planting.....</i>	<i>32</i>
6.	EFFECTS OF THE APPEAL SCHEME .....	34
7.	SUMMARY OF ASSESSMENT .....	40

---

## 1. INTRODUCTION

- 1.1. My name is Sasha Berezina. I am a Director of Context Planning Ltd, an independent town planning consultancy operating primarily in the South West on a wide portfolio of projects. I am instructed by South Oxfordshire District Council (SODC) to give evidence on its behalf at the public inquiry into this appeal.
- 1.2. I had over 12 years of experience working in the LPA planning departments of West Dorset Council and Bath and North East Somerset Council as a Planning and Conservation Officer and a Senior Planning and Conservation Officer. I have held my current position as a director of Context Planning for the past 3 years, since January 2022.
- 1.3. I hold a BA(Hons) in Socio-Cultural Services & Tourism from South Urals State University and an MA in Town and Country Planning from University of the West of England.
- 1.4. I have been a fully chartered member of the Royal Town Planning Institute (RTPI) since December 2015. I have been a full member of The Institute of Historic Building Conservation (IHBC) since April 2022.
- 1.5. I have provided expert planning and heritage evidence at appeals and have worked both as a case officer and as heritage consultant on multiple development projects that had impact upon heritage assets of the highest significance. My experience includes dealing with a diverse range of cases involving the assessment of physical changes to all manner of heritage assets, and/or developments affecting their settings. I have undertaken numerous impact assessments where I have considered the impacts of new development

---

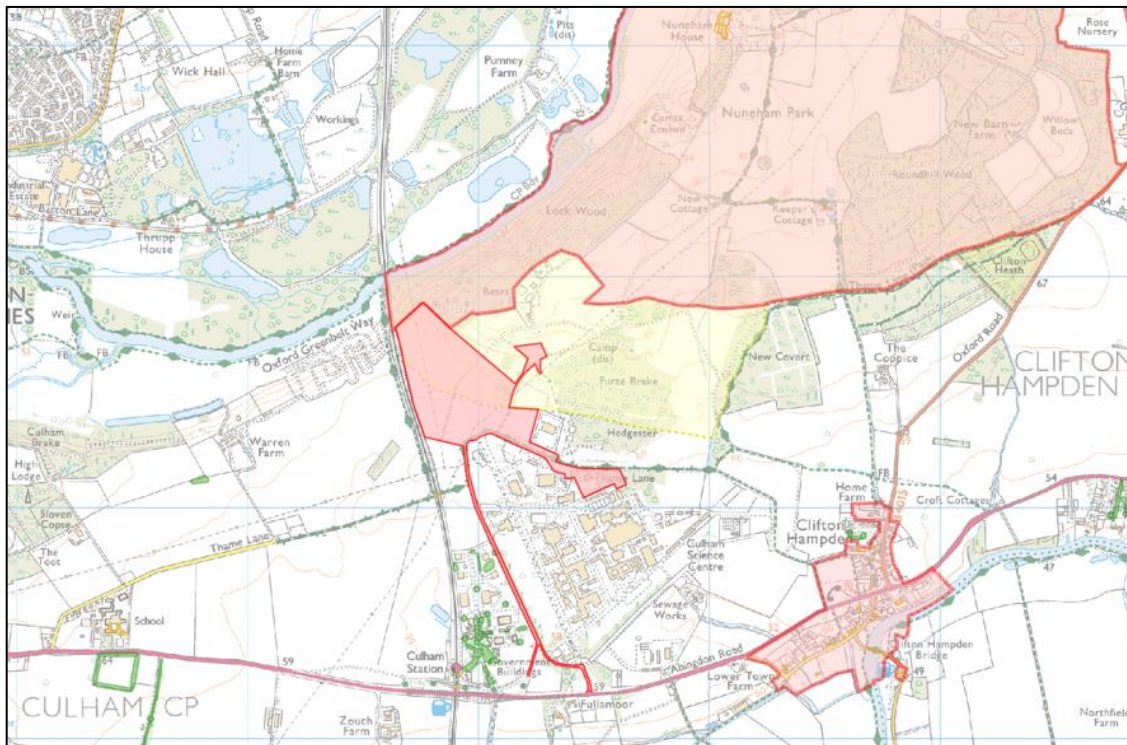
on the historic environment (dealing with physical impacts, setting and townscape), including developments within nationally important historic parks and gardens such as Westonbirt (Grade I park and Grade II\* Italian and the Walled Gardens), Claverton Manor (Grade I), Kelston Park (Grade II\*), Newton Park (Grade II\*), Bath Parade Gardens (Grade II), Sydney Gardens (Grade II), Hinton House Park (Grade II) and many more.

- 1.6.** My evidence is solely concerned with matters associated with the assessment of the potential impact of the Appeal Scheme (and not the original Application Scheme) on heritage assets, and more specifically - upon the Grade I listed Registered Park and Garden of Nuneham Courtenay (RPG), excluding archaeological assets.
- 1.7.** My evidence should be read in conjunction with the main statement of common ground (SOCG) which will be agreed and signed by both main parties, well in advance of the inquiry opening.
- 1.8.** Prior to taking instructions to act on behalf of the Council I undertook a desktop review of the proposal, the supporting documentation including the Heritage Impact Assessment, and of local policies and allocations in the vicinity. I also visited the Appeal Site prior to formulating my own opinion in relation to heritage issues. I have been to the site and the wider area on two occasions, visiting Culham Train Station, walking through Culham 1 industrial estate, the public rights of way in and around the RPG, fields of the site, access roads, the former Abingdon Drive and Nuneham Courtenay Parkland and grounds.
- 1.9.** I am aware of the duties of expert witnesses. I work to the Codes of Conduct for chartered members of RTPI and for full members of IHBC. I confirm that, insofar as the facts stated in my Proof of Evidence are within my own knowledge, I have made clear which they are and that I believe them to be true, and that the
-

opinions I have expressed represent my honest and objective professional opinion.

## 2. APPEAL SITE

- 2.1.** The appeal site partially overlaps Nuneham House RPG (Grade I) and is also adjacent to Nuneham Courtenay Conservation Area. There are a number of listed buildings in the vicinity, including Culham Station Ticket Office (Grade II\*), Thame Lane Bridge (Grade II), Fullamoor Farmhouse (Grade II) and the Europa School (Grade II). Nuneham House (Grade II\*) lies approximately 1.5km to the north-east.



**Fig.1 - Application site (Dark Red line) in relation to Nuneham Courtenay Registered Park and Garden (Yellow), Nuneham Courtenay Conservation Area (Pink), Listed buildings (Dark Yellow) and Trees protected by Tree Preservation Order (Green circles)**

- 2.2.** Overall, the appeal site covers approximately 26.8ha comprising open fields and

part of the Nuneham Courtenay RPG land, a tarmac track known as Thame Lane and a farm track. The site is accessed from the south-east and south by the Thame Lane, which connects to Abingdon Road to the south (Fig.1).

### 3. THE DEVELOPMENT

#### Application Scheme

- 3.1. Planning application ref. P24/S1498/FUL (Fig.2) sought permission for a 500-MegaWatt (MW) Battery Energy Storage System (BESS) on a site area of approximately 27 hectares, with 296 sound insulated lithium-ion battery units housed within standard shipping containers and 37 larger noise insulated inverter houses to accommodate the inverters and transformers.



Fig.2 – Application Proposal (Extract from Block Plan ref. SL254\_L\_X\_GA\_1, CD 1.1.57)



- 
- 3.2.** The proposal included an electricity substation compound, and a connection tower located within the Registered Park and Garden. Additionally, it was proposed to place 3 water storage tanks, a storm water attenuation lagoon, a 2-metre-high earth bund along the western boundary of the site and fencing erected at various heights around the site.

### **Refusal Reason 3 – Heritage Impacts**

- 3.3.** Reason for refusal 3 of the decision notice, issued on 8 August 2024 was as follows:

*The proposed development of an industrial nature would encroach into the Nuneham Courtenay Grade I Registered Park and Garden (RPG), a highly significant C18 parkland landscape, which contains several listed buildings and structures. The development will result in significant adverse impacts to the designated heritage asset, and the setting of the RPG. The proposed landscape mitigation fails to respect the character of the RPG and its setting and would result in further harm. The harm to the heritage assets considerably outweighs the benefits of the proposed development and the proposal is therefore contrary to the NPPF and Policies ENV6 and ENV10 of the South Oxfordshire Local Plan 2035.*

*Further, this proposal, in addition to the development on allocated sites STRAT8 and STRAT9, will create an increased cumulative impact harmful to the setting of the designated Registered Park and Garden, contrary to Policies ENV6 and ENV10 of the South Oxfordshire Local Plan 2035, the NPPF.*

### **Heritage consultees comments to date**

- 3.4.** Harmful effects of the proposed development upon the setting of the heritage asset (Grade I listed RPG) have been identified by a number of parties, including the Appellant's heritage advisers.
- 3.5.** The Local Planning Authority (LPA) in their pre-application advice on a proposal for 625 batteries (CD1.5.1) concluded that the proposal would have resulted in substantial harm to Nuneham Park and its setting.
-

- 
- 3.6.** In relation to the subsequent Application Scheme, the Heritage Officer (CD1.3.24) advised the proposals would have significant adverse impacts on designated heritage assets.
- 3.7.** Historic England (CD1.3.16) in their comments of 10<sup>th</sup> July 2024 assessed that the application proposal would result in harm to this highly significant designed landscape.
- 3.8.** The Garden Trust joint response with Oxfordshire Garden Trust (CD 1.3.30) comment of 21<sup>st</sup> June 2024 strongly objected due to substantial and permanent harm to the Grade I listed RPG and its setting.
- 3.9.** I generally concur with the conclusions of much of the above assessment albeit I do not identify substantial harm in NPPF parlance. My assessment is made in relation to the amended Appeal Scheme and where my professional opinion diverges from these consultees this is made clear in my statement.

### **Appeal Scheme amendments**

- 3.10.** The proposed relocation of the siting of the connection tower and changes to the mitigating planting proposals are as follows:
- relocate the proposed connection tower from being directly within the RPG to the main battery storage compound, outside the RPG boundary but adjacent to it;
  - the proposed mitigatory planting no longer includes raised bunds and is marginally extended along western boundary of the site.
- 3.11.** There are other changes including minor alterations to the fence location around the compound, reduction in the number of water tanks, storage containers and parking spaces. The connection tower, the sub-station extension and the
-



landscaping are proposed on permanent basis. Other components are proposed to be retained for 40 years.

- 3.12.** The appeal proposal retains the 500-megawatt (MW) capacity. The Appeal Scheme would comprise reduced number of battery containers (from 296 to 248), inverter houses (from 37 to 31), and water tanks (from 3 to 2). Additionally connector tower, substation with control room, new access road network, drainage infrastructure, landscaping measures and permissive path (Fig.3).
- 3.13.** The Draft Statement of Common Ground (SOCG) (CD 2.5) provides a fuller description of the appeal proposals and the site context. The relevant planning history at the site has been documented in the Council's Statement of Case (CSOC) (CD 2.4.2).



**Fig.3 – Appeal Proposal (Extract from Block Plan ref. SL254\_L\_X\_GA\_1\_RevA, CD 2.3.17)**

---

## 4. STATUTORY DUTIES, PLANNING POLICY AND GUIDANCE

### **Town and Country Planning Act 1990 and Compulsory Purchase Act 2004**

- 4.1. Sections 70(2) and 79(4) of the Town and Country Planning Act 1990 and S38(6) of the Planning and Compulsory Purchase Act 2004 require that applications for planning permission under the planning Acts be determined in accordance with the development plan, unless material considerations indicate otherwise. The starting point for consideration of this appeal must therefore be the development plan.

### **Planning (Listed Buildings and Conservation Areas) Act 1990**

- 4.2. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the decision maker to pay special regard to the desirability of preserving the settings of the listed buildings, and Section 72 requires that special attention be paid to preserving or enhancing the character or appearance of the conservation area.
- 4.3. In relation to the specific matters considered within this Proof of Evidence, the following policies and guidance documents would apply:

### **The development plan - The South Oxfordshire Local Plan 2035**

- 4.4. The development plan was adopted following examination in public at which the policies were found to be 'sound'. In determining the soundness of the development plan documents they were found to meet the tests outlined in NPPF paragraph 36 in that they were consistent with national policy so as to

---

enable the delivery of sustainable development.

- 4.5.** The development plan for South Oxfordshire contains a series of objectives which underpin the Local Plan. These should not be viewed in isolation, but rather should be considered as a full suite of objectives. The document makes clear that a balance needs to be struck between the core pillars of sustainable development, including the protection of the environment and the need to provide sufficient development to meet the needs of the existing and future population.
- 4.6.** In relation to heritage matters Strategic Objective 7.2 – Natural and Built Environment is of relevance seeking to: *“Conserve and enhance our rich and varied historic assets and their settings, celebrating these as some of our strongest attributes”*.
- 4.7.** Policies ENV6 and ENV10 contribute towards achieving this objective.
- 4.8. ENV6 – Historic Environment and Heritage Assets.** Policy ENV6 is a comprehensive historic environment related policy that seeks to ensure that proposals are based on an understanding of the significance of any heritage assets that may be affected. Proposals for new development that may affect designated and non-designated heritage assets should take into account the desirability of sustaining and enhancing the significance of those assets and putting them to viable uses consistent with their conservation. This includes heritage assets such as Listed Buildings, Registered Parks and Gardens, non-designated buildings, structures or historic landscapes that contribute to local historic and architectural interest of the district’s historic environment.
- 4.9.** The policy states that proposals for new development should be sensitively designed and should not cause harm to the historic environment. Where there
-

---

is impact on heritage assets, the policy provides support where they:

- i) conserve or enhance the significance of the heritage asset and settings. The more important the heritage asset, the greater the weight that will be given to its conservation;*
- ii) make a positive contribution to local character and distinctiveness (through high standards of design, reflecting its significance, including through the use of appropriate materials and construction techniques);*
- iii) make a positive contribution towards wider public benefits;*
- iv) provide a viable future use for a heritage asset that is consistent with the conservation of its significance; and/or*
- v) protect a heritage asset that is currently at risk.*

**4.10. ENV10 – Historic battlefields, Registered Parks and Gardens and historic landscapes.** Policy ENV10 states that proposals should conserve or enhance the special historic interest, character or setting of park or garden on the Historic England Registers of Historic Battlefields or Register of Historic Parks and Gardens of Special Historic Interest in England (RPGs).

**4.11.** Any harm to or loss of significance of any heritage asset requires clear and convincing justification. Any substantial harm to such assets should be wholly exceptional in case of Grade I and Grade II\* RPGs.

**4.12.** Applicants are required to describe, in line with best practice and relevant national guidance, the significance of any heritage assets affected including any contribution made by their setting.

**4.13.** The Council's position is that ENV6 and ENV10 are consistent with Chapter 16 (Conserving and enhancing the historic environment) of the NPPF which is an important material consideration.

---

## National Planning Policy Framework (NPPF)

- 4.14.** Paragraph 202 of the NPPF recognises that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 4.15.** Paragraphs 207 and 208 underline the importance of the understanding of the significance of any heritage assets affected, including any contribution made by their setting. Such appreciation should inform the decision-maker of the potential impact of the proposal on their significance. The available evidence and any necessary expertise should be taken into account when considering the impact of a proposal on a heritage asset, *“to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal”*.
- 4.16.** Paragraph 212 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 4.17.** Paragraph 213 clarifies that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.
- 4.18.** Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use in accordance with paragraph 215.

- 
- 4.19.** In scenarios of new development happening within the setting of heritage assets, paragraph 219 encourages LPAs to look for opportunities to enhance or better reveal their significance.
- 4.20.** ‘Significance’ in terms of heritage-related planning policy is defined in Annex 2 of the NPPF as *‘the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset’s physical presence, but also from its setting.’*
- 4.21.** The definition of ‘Setting’ in the Glossary is the *“surroundings in which a heritage asset is experienced”*. Further, the extent of a setting *“is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral”*.

### **Planning Practice Guidance (PPG)**

- 4.22.** Using the above definitions, setting is not itself a heritage asset but elements of a setting *“may make a positive or negative contribution to the significance of an asset”*. And paragraphs 212-221 of the NPPF make it clear that, in considering a development proposal, what has to be assessed is the effect there would be, not on the setting, but on the significance of the heritage asset concerned.
- 4.23.** Paragraph: 013 of the PPG (Reference ID: 18a-013-20190723) elaborates on the concept of setting explaining that: *“all heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset’s curtilage may not have the same extent”*.
- 4.24.** The visual relationship between the asset and the proposed development and
-



---

associated visual/physical considerations is an important consideration, including views of or from an asset.

- 4.25.** The PPG guidance goes on to say that the way in which we experience an asset in its setting is also *“influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each”*.
- 4.26.** The PPG goes on to state: *“The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.”*
- 4.27.** Furthermore: *“When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.”*

## **The Setting of Heritage Assets (Historic England December 2017)**

- 4.28.** Historic England latest guidance on setting set out in Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) published in December 2017 (CD6.5) highlights the twin roles of setting:

- it can contribute to the significance of the heritage asset, and
- it can allow the significance to be appreciated.

**4.29.** GPA explains that *“extensive heritage assets, such as historic parks and gardens, landscapes and townscapes, can include many heritage assets, historic associations between them and their nested and overlapping settings, as well as having a setting of their own.”*

**4.30.** Understanding of the history of change over time should assist in determining how further development within the asset’s setting is likely to affect the contribution made by setting to the significance of the heritage asset. Settings that closely resemble historic arrangements contribute particularly strongly.

**4.31.** Where cumulative change has compromised the setting, to accord with NPPF policies, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building’s original designed landscape or the removal of structures impairing key views of it.

**4.32.** The GPA explains that: *“the setting of a historic park or garden, for instance, may include land beyond its boundary which adds to its significance but which need not be confined to land visible from the site, nor necessarily the same as the site’s visual boundary. It can include:*

- land which is not part of the park or garden, but which is associated with it by being adjacent and visible from it*
- land which is not part of the site but which is adjacent and associated with it because it makes an important contribution to the historic character of the site*

---

*in some other way than by being visible from it, and*

*-land which is a detached part of the site and makes an important contribution to its historic character either by being visible from it or in some other way, perhaps by historical association”.*

## **Conservation Principles, Policies and Guidance (Historic England, April 2008)**

- 4.33.** This document (CD6.3) is generally intended as a guidance to Historic England staff on best practice setting out a logical approach to making decisions and offering guidance about all aspects of England’s historic environment. It sets out high level conservation principles responding to the over-arching philosophical framework at the root of conservation activity.
- 4.34.** The document contains a number of policies specific to some common kinds of action, followed by associated Guidance on their interpretation.
- 4.35.** Guidance policy pertaining to changes which would harm the heritage values of a significant place states that “...*these should be unacceptable unless:*
- a. the changes are demonstrably necessary either to make the place sustainable, or to meet an overriding public policy objective or need;*
  - b. there is no reasonably practicable alternative means of doing so without harm;*
  - c. that harm has been reduced to the minimum consistent with achieving the objective;*
  - d. it has been demonstrated that the predicted public benefit decisively outweighs the harm to the values of the place, considering:*
    - *its comparative significance,*

- 
- *the impact on that significance, and*
  - *the benefits to the place itself and/or the wider community or society as a whole.”*

**4.36.** ‘Setting’ is defined within the Guidance as “*The surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape*”.

**4.37.** Setting of a significant place will normally be guided by the extent to which material change within it could affect (enhance or diminish) the place’s significance.

**4.38.** ‘Context’ is defined as “*Any relationship between a place and other places, relevant to the values of that place*”.

**4.39.** Context embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places.

## 5. THE SIGNIFICANCE OF THE RPG AND HISTORIC DEVELOPMENT OF THE SETTING

**5.1.** The park at Nuneham Courtenay is registered as a Grade I landscape. It is therefore one of the top 8% of the 1,700 landscapes on the Historic England Register of Parks and Gardens of Special Historic Interest which are considered

---

to be of exceptional special interest and national historic importance. This heritage asset embodies evidential, historic, aesthetic and communal heritage values.

- 5.2.** There are several archaeological finds within its boundary. Harcourt's archive provides the comprehensive primary source of information about changes in the park over the past 250 years. The physical presence of the house and the park's planting and layout provide the ability to understand and interpret this evidence.
- 5.3.** Inspired by Earl Harcourt's tour of Italy and study of Greek and Roman arts, Nuneham Courtenay House's parkland had played a significant historical role in garden and landscape design and became one of the most influential landscapes in British garden history, with a flower garden conceived by Rousseau, William Mason and others; pleasure grounds and parkland embellished by Lancelot Brown; and contributions by W.S. Gilpin and William Robinson in the 19th and early 20th centuries.
- 5.4.** Over the centuries, philosophers, architects, artists, photographers, poets and writers drew sensory and intellectual stimulation from the place. There are multiple associations with many notable historic figures including the Royal family, William Turner, Lewis Carol, Jerome K Jerome, and many more.
- 5.5.** In the C19 Nuneham estate hosted multiple fetes, military drills and was a destination for river traffic and tourists walking along the river Thames and through the park to Culham train station. The house, the remains of the park, Carfax Conduit and the distinctive boathouse continue to be local landmarks. During and shortly after WWII the house served as the Central Interpretation Unit for air surveillance photography. Many wartimes photographic interpreters received their training there. Public Rights of Way through the park allow visitors to walk across parts of the park and events are held bringing many new visitors

---

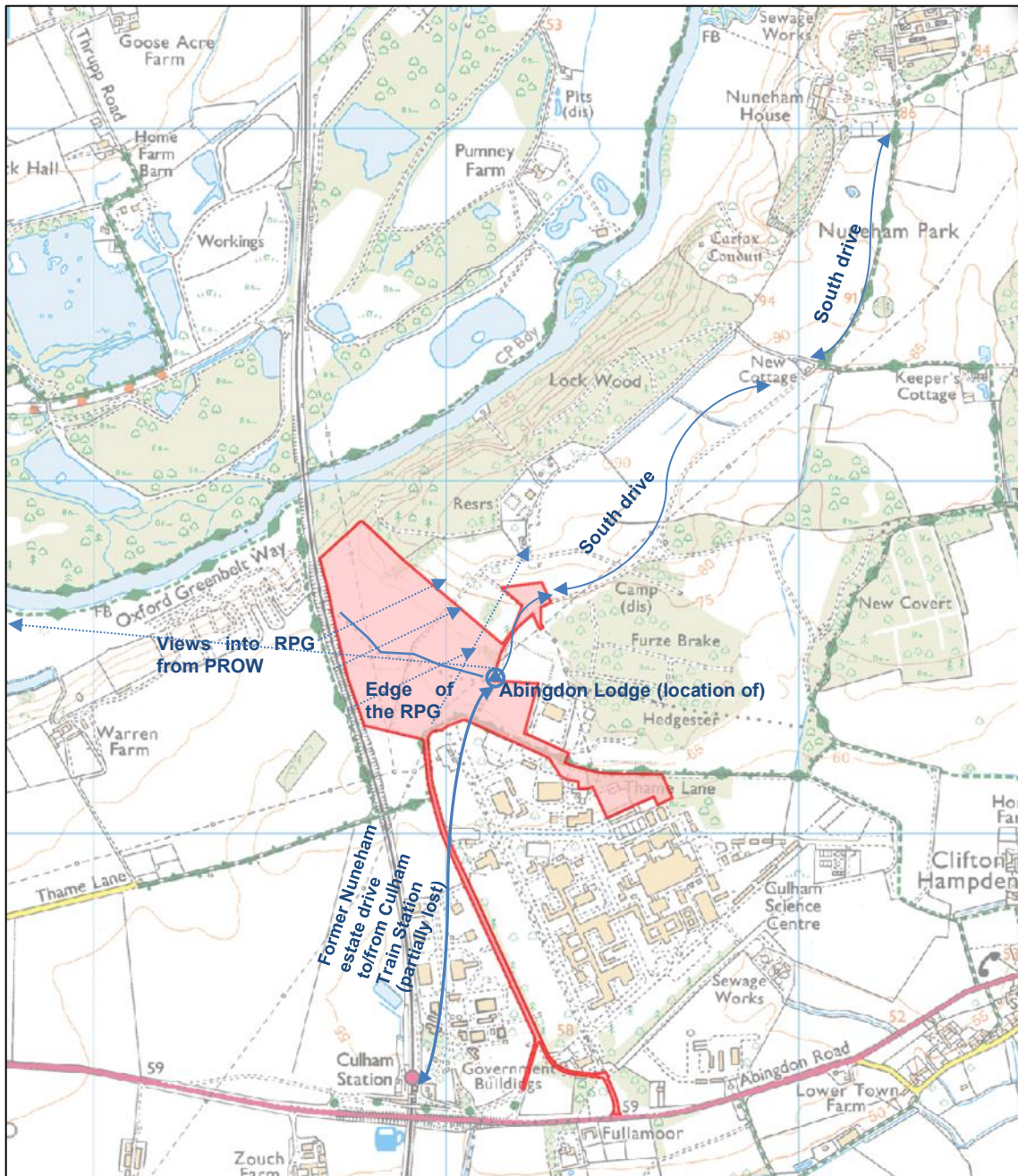
to the garden. A circular 50 miles route of the Oxford Green Belt Way passes the RPG opening wide panoramic vistas of the southern edge of the park which otherwise is not accessible to public.

- 5.6.** The contribution made by the setting of the RPG to evidential, historic, aesthetic and communal heritage values is high, especially in view of the naturalistic principles that guided the original design and layout of the park. Like with many of Lancelot Brown's grand projects, the park's setting extends well beyond its hard boundaries and insensitive development within it can cause profound damage.
- 5.7.** The spatial arrangement of the wider setting that would be affected by the Appeal Scheme is specifically mentioned in the listing description for Nuneham Courtenay RPG which notes the south entrance, the drive and the connection with the train station:

*The south drive, now disused but before c 1900 the principal entrance from London, enters the park 2km south-east of the House, past the site of the Abingdon Lodge (now gone). The drive curves north-east through the park, with views to the west, south and east opening up at various points, joining the main drive by Manor Lodge, 200m east of the House. At the north-west corner of the park, the ferry (now gone) gave direct access from the Abingdon and the west bank of the river, past Ferry Cottage, a single-storey, rendered building. The drive from here runs east and south, ascending the steep slope from the river into the park, passing the stables and walled garden, joining the main drive 200m east of the House by Manor Lodge.*

- 5.8.** The components of the setting affected include the historic south drive to and from Nuneham House, the traceable location of the lost gateway buildings (Abingdon Lodge), and the remnants of the former estate road beyond the boundary of the RPG that connected the park with another heritage asset Culham train station and its Grade II\* listed ticket office (Fig.4).



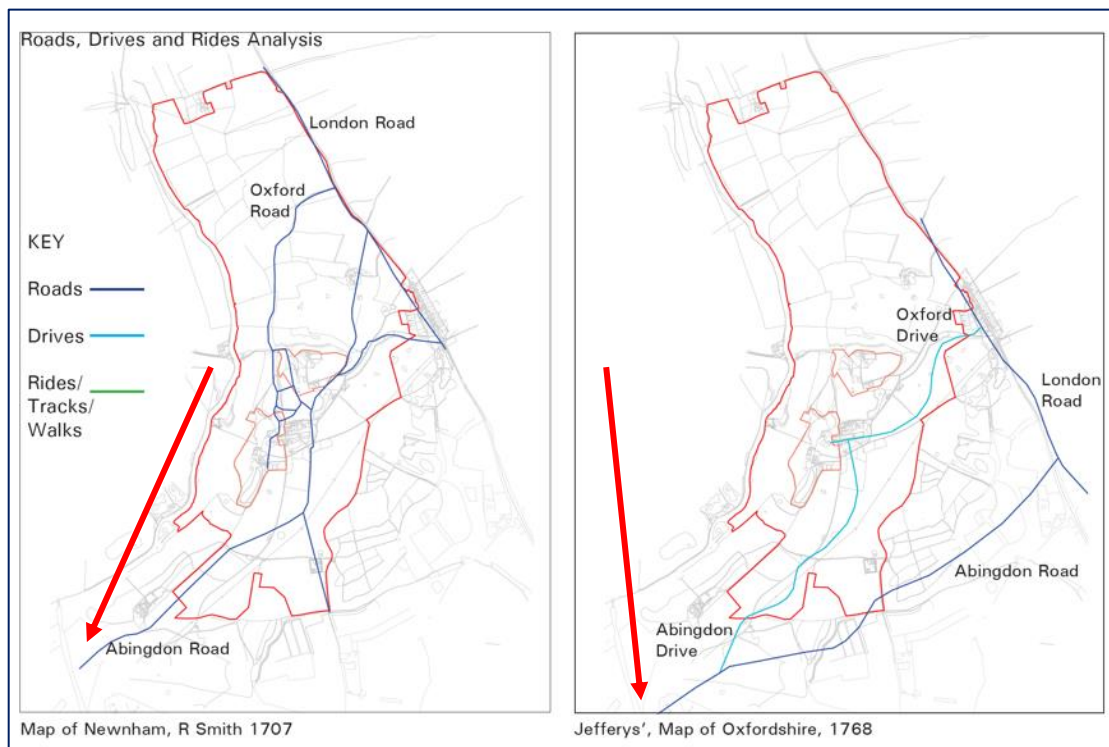


**Fig. 4 – Indicative position of various elements of the former southern arrival route and some existing views in and out of the RPG in relation to the appeal site**

## **South Park And South (Abingdon) Drive**

- 5.9.** The Nuneham Estate Parkland Management Plan (2019) based on an earlier Conservation Management Plan (2009) (CD6.2) provides an analysis of the

designated landscape, its key stages of development, designed drives and access routes. The study area of the Management Plan unfortunately is limited to the land owned by Nuneham Estate Ltd which forms only part of the RPG and does not include the full extent of the South Park area. Nevertheless, in many parts it does provide a comprehensive assessment of the whole estate up to its southern boundary. The document contains a helpful analysis of C18-C21 changes to all drives and rides across the park, but the key change to the southern drive that would be affected by the appeal happened at the point of conceiving of the original layout and design (Fig. 5).



**Fig.5 – Extract from Roads, Drives and Rides Analysis (Fig.65, p87 of Parkland Management Plan, 2019)**

- 5.10.** Before 1755, Robert Smith's Map of Newnham provided the first accurate documentation of the estate landscape. It depicted a village surrounded by agricultural land, areas of common and heathland (furzewood), and two

---

significant woodlands, Park Wood and Black Wood. Access to the village was via the Oxford Road from the north, Abingdon Road from the south-west and a further road up Long Meadow from the south. Abingdon Road ran along the south west edge of Lock Wood, before turning north to the centre of the village.

- 5.11.** On the creation and enclosure of the park in mid-C18 and the removal of the old village, considerable changes were made by Harcourt to create the new access from the south and the road was moved to the south of the park joining the second drive north-west to London Road.
- 5.12.** Jeffrey's Map (Fig.6) plotted the transformation of the estate in the first half of the 18th century to a remarkably complete landscape park. It shows that Earl Harcourt built Abingdon Lodge on the south boundary of the park and created the Abingdon Drive which meandered through the centre of the park towards the house. The lodge and arched gateway were built after 1759, and probably designed by Stiff Leadbetter.
- 5.13.** The sinuous southern drive was in place by 1768 connecting to the relocated Abingdon Road which was now bypassing the park. It made use of the undulating topography and later of tree planting by Lancelot Brown to create dynamic views as one journeyed along the drive. The line of Abingdon Drive up to the edge of the park remains unchanged to this day opening spectacular views all the way to Abingdon.





**Fig.6 – Jeffrey's Map, 1767 is the first to show the development of the park at Nuneham (Extract from Parkland Management Plan, 2019)**

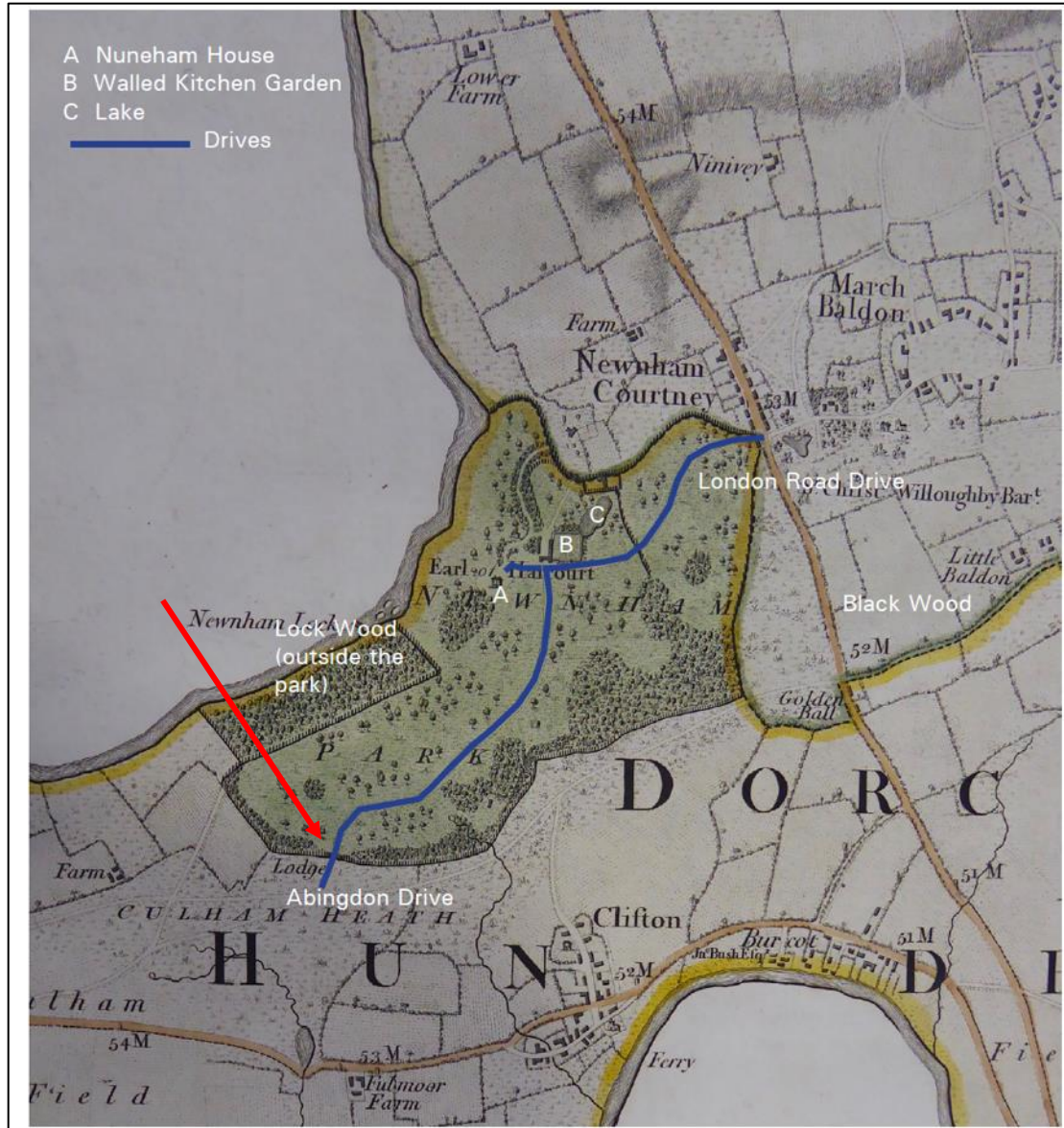
- 5.14.** Lancelot Brown was invited by the 2nd Earl Harcourt to make proposals for the garden and the park. The South Park was the focus for Brown's Plan of Alterations 1779 (Fig.7). The plan shows an open parkland landscape without the field boundaries, and a drive through the park, from the newly built Abingdon Lodge. Elements of this open section of the parkland can still be appreciated from the Oxford Green Belt PROW. Brown also appears to have utilised existing field boundary trees within his designs, probably to give a sense of maturity to the park.



**Fig. 7 - Plan of Alterations by Lancelot Brown, 1779 ( Extract from Parkland Management Plan, 2019)**

- 5.15.** Some 18 years later Davis's map shows that Brown's plan for this area had been largely implemented with the exception of the drive through Black Wood (Fig.8).





**Fig. 8- Davis's Map of Oxfordshire, 1797 (Extract from Parkland Management Plan, 2019)**

- 5.16.** Neither the original Oxford Drive nor the 'new' Oxford Drive (created in the mid 19<sup>th</sup> century through the Pinetum and across Windmill) survived in use, but remains of the latter are visible as a grass track through the estate. The only drive now in use to access Nuneham House is the drive from the centre of Nuneham Courtenay village via All Saints Church, passing the right turn to the Rectory. This is not a satisfactory approach to the house and was never one of



---

the designed approaches to the house (it runs along the north side of the tree belt which forms the northern edge of the park, and appears to have been intended as a service route and access to the Rectory).

- 5.17.** There is no longer access from the Estate from the south along the old Abingdon Drive due to separate ownership and the Culham Science Centre. The Abingdon Drive survives as an internal drive used by tenants and estate vehicles.
  
  - 5.18.** Restoration of Abingdon Drive is a long term aspiration of the RPG Management Plan. Recommendations seek to “*investigate the re-opening of Abingdon Drive as the main entrance into the park*” and to “*resurface Abingdon Drive (either loose gravel or tarmac with a bonded gravel)*” (see Chapter 8: Management Recommendations 119 and 120, Volume I of Parkland Management Plan, CD6.2).
  
  - 5.19.** The Plan’s vision for the parkland and wider estate at Nuneham is “*to reinstate the spirit and aesthetics of the Arcadian landscape, as developed by the Harcourt family during the mid– late 18th ... The landscape continued to evolve throughout the 19th century and into the early 20th century and the aim is to conserve and enhance the character and features of the landscape which evolved through almost 200 years of ownership by the Harcourt family*”. The distinct elements of the Nuneham landscape to be conserved and enhanced include “*Improving access to the park and circulation around it, by recreating drives and rides, with the possible connection to Harcourt Arboretum.*” (p.146)
  
  - 5.20.** In relation to views and access pertaining to Abingdon Drive, the Plan seeks to ensure that new planting takes into account ‘*dynamic views journeying along the Abingdon drive*’ (p.148) and to ‘*improve access across the park thorough the reinstatement of the way-marking of the historic drives. Primarily this relates*
-

---

*to the existing public rights of way which cross the site, but consideration should also be given to creating further permissive access”.*

## **Road to Culham Train Station**

- 5.21.** By the mid C19 the evolving composition of the south drive continued beyond the gateway of Abingdon Lodge and the bucolic tree belt boundary, and linked to a tree-lined avenue connecting the estate with the newly built Culham railway station (built in 1844 and grade II\* listed itself). The route from Abingdon Lodge went straight before turning towards the station forecourt near the Ticket Office (Fig.9). The exact time the estate road was built is unclear, but it is likely that Thame Lane extended to the station with the railway's arrival.
- 5.22.** The station was set about three miles from Abingdon and between the villages of Culham and Clifton Hampden with nothing other than a few cottages and farms nearby, but it was the nearest convenient point on the railway to Nuneham House, making it ideal for travel to London. Several Harcourt family members held significant Government positions in London, including MPs and Secretaries. In August 1843, the subject of the location for the new station was raised by Archbishop Harcourt who expressed preference for the railway station to be near Thame Lane rather than the Abingdon turnpike. Isambard Kingdom Brunel, who was to design the station, showed no preference and deferred to the Company.
- 5.23.** Despite the Harcourts' influence, the station was built on the turnpike road, possibly due to the site's suitability. Interestingly, the Culham Station buildings were the only brick structures along the line at its opening, unlike other timber-built stations, indicating possible external influence from the Harcourts seeking high quality of construction (from research by Colin Taylor published online <https://culhamticketoffice.co.uk>) (CD6.4).
-



**Fig.9 - 1910 2<sup>nd</sup> Ordnance Survey Map (National Library of Scotland) and extract from Plate 13 of Historic environment DBA CD2.2.3. Aerial Photo (dated June 1943)**

- 5.24.** The Park hosted many fêtes and gatherings, drawing thousands of people to the road. Historic research by Colin Taylor published online (<https://culhamticketoffice.co.uk> CD6.4) provides an impressive collection of information about the Park and the station, as well as extracts from historic press coverage of various events and visitors travelling from Culham Station to Nuneham House between 1857 and 1931. The estate road was also part of the Great Western Railway circular route combining options for travel by both rail and river between Oxford and Kingston stopping at Nuneham.
- 5.25.** Development of the Royal Naval Air Station (RNAS Culham) or HMS Hornbill, an airfield operational as part of the Fleet Air Arm between 1944 and 1953 and the consequent construction of CSC had significant negative effect upon the

station driveway and the southern access into the park leading to their deterioration and extensive destruction. Nevertheless, the Avenue of trees inside Culham 1 continues to follow the curve near the station. At the most northerly point (within the appeal site), a section of the estate road into Nuneham Park survives in a form of a farm track that runs up from farm gates to the top of the mount where Abingdon Lodge once stood (Fig. 10).



**Fig.10 – Remnants of tree avenue by Culham station (left) and Abingdon Lodge approach (right) now located to the north of Thame Lane circumnavigating CSC**

## Abingdon Lodge

- 5.26.** The Abingdon Lodge formed an impressive southern entrance to Nuneham Park. Henry Taunt's 1906 photograph (Fig.11) shows a well-maintained scene of the park-facing façade of the gatehouses taken from the south drive. A lady standing by the gateway provides a sense of scale for these structures. The Lodge consisted of two symmetrical houses with individual curtilages beside the gateway.





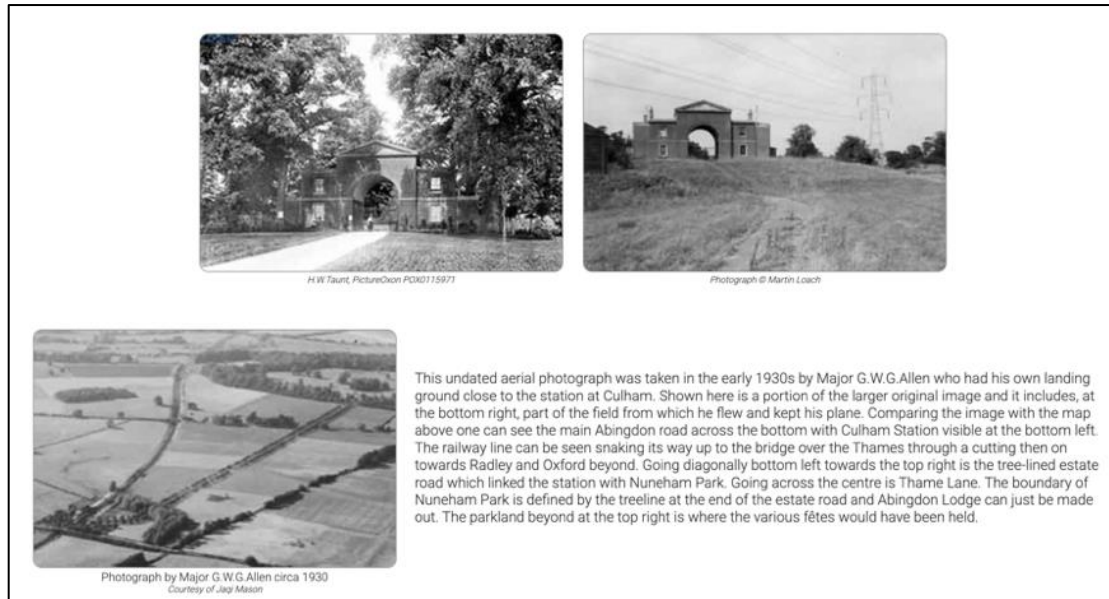
**Fig. 11 - Image by Henry W. Taunt dated 1906 from the collections of Oxford History centre<sup>1</sup>**

- 5.27.** The photo also illustrates the historical boundary mature trees planted along the park's southern boundary. Glimpsed beyond is a line of trees lining the station drive. This entrance welcomed various visitors over the years including Kings and Queens, Princes and Princesses, and other dignitaries, and politicians of the time traveling to or from Culham station.
- 5.28.** Despite the development and later closure of RNAS Culham, the gatehouse managed to survive largely intact and in isolation for decades before finally being demolished. The early 1970s photo by Martin Loach (Fig.12) captured the gatehouse shortly before its demolition. The trees have been removed, and the

○

<sup>1</sup> <https://heritagesearch.oxfordshire.gov.uk/images/POX0115971>

estate road is barely visible.



**Fig. 12 - Screenshot from the Culham Ticket Office website showing images of Abingdon Lodge in 1906 and in 1970s. The aerial photo showing the tree-lined estate road to Nuneham Park is believed to be early 1930s (courtesy of Mr. Colin Taylor)**

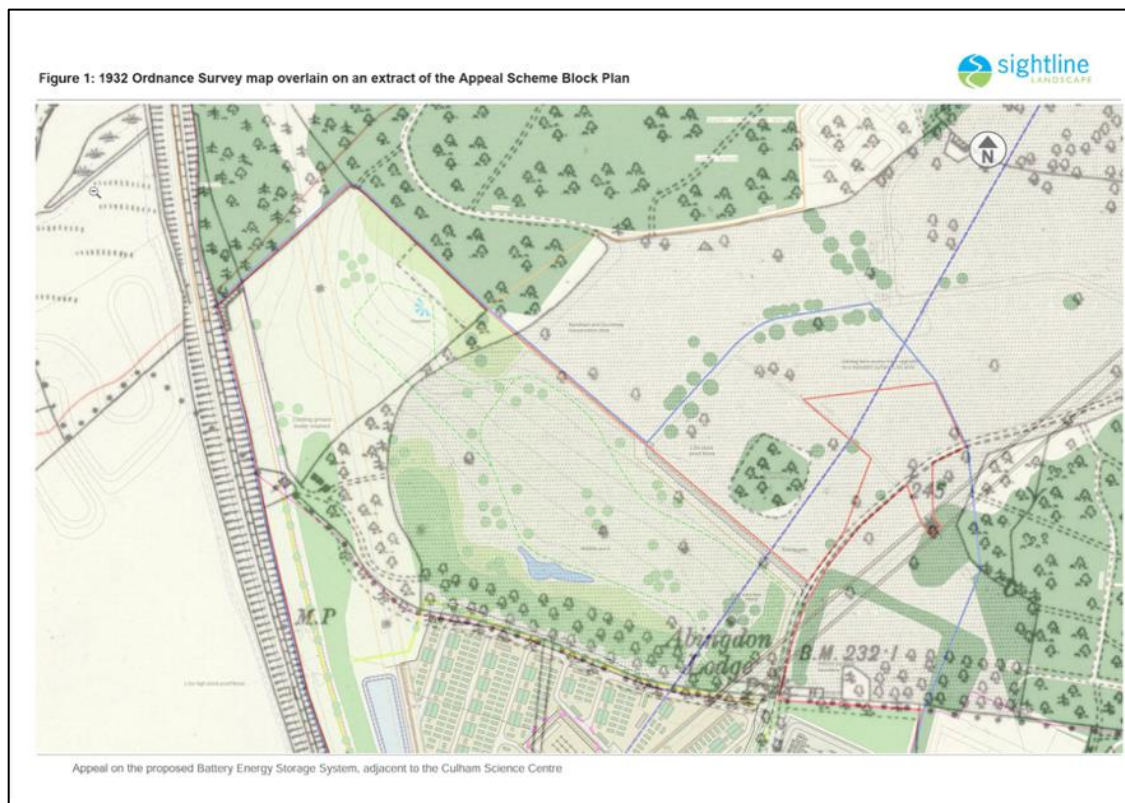
- 5.29.** The Lodge has been completely demolished but its former location is still identifiable through the position of the access and Abingdon drive as well as the slight elevation within the landscape.

## Tree Belts and Planting

- 5.30.** The Condition Survey in the Management Plan (Character Area 4: Park (South), para. 6.5.2 and Fig.102 p.144 CD6.2) indicates that the Lancelot "Capability" Brown signature tree belt further north into the park, which would have provided visual structure and framed distant views, has been significantly lost. These belts, were often planted as screens or clumps, served to direct the eye and emphasize certain features of the landscape, while also providing shelter and visual separation. The design plan by Brown (Fig.7) indeed illustrates how Abingdon Drive wound through these belts, and selective views out into the working countryside would have been experienced at intervals.



**5.31.** The Management Plan study does not analyse the southernmost area beyond the ownership of Nuneham Estate, so I am unable to conclusively attribute existing planting further south to a particular period or design. However, the now lost southernmost perimeter tree belt appeared on maps before the plan was laid out by Brown in 1779 and, the Management Plan concludes, it most likely was re-used by him to retain some mature planting within the new parkland. Overall, it transpires that the outer tree belt was strategically incorporated into the design to act as a screen delineating the edge of the park. The approach road and the Abingdon Lodge gateway served as the focal and view point.



**Fig.13 - Overlay of the Appeal Scheme over the 1932 OS map (CD 2.3.13)**

**5.32.** The overlay of the Appeal Scheme on the 1932 OS map provided by the appellant (Fig.13) shows a centrally placed group of trees and several scattered species in the open area between Abingdon Drive and the southern edge of Lock Wood.

- 
- 5.33.** The group of trees appears in this location as early as Jeffrey's Map of 1767 (Fig.6), and on Davis's Map of Oxfordshire, 1797 (Fig. 8) these and other individual trees can also be located. These trees and a few other veteran trees can currently be seen in panoramic views from the west.

## **6. EFFECTS OF THE APPEAL SCHEME**

- 6.1.** NPPF (para. 202) explains that heritage assets are an irreplaceable resource, and should be conserved in the manner appropriate to the significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 6.2.** There is no dispute that the Park, registered in grade I is a heritage asset of the very highest importance. There is also no dispute that the appeal site lies within the setting of the Park; and that the harm caused to the significance would be 'less than substantial'. The term 'less than substantial', however, does cover a wide magnitude of harm – and the question is just how great that harm would be.
- 6.3.** Whilst it is a relatively small and altered element of the extensive heritage asset, the appeal site, which includes the location of the former southern entrance into Nuneham Park, has a notable and greater level of sensitivity and significance compared to some other peripheral locations on the edge of this RPG.
- 6.4.** In my assessment there are two aspects to the impact on the setting and consequently upon the significance of the Park – historical and visual which are most important. I find that considerable harm would result to the legibility of the designed spatial arrangement and to visual qualities of the setting.

- 
- 6.5.** The historic southern entrance was a deliberate design decision by Harcourt that required relocation of the former road into the village. The entrance and the drive pre-date Capability Brown's masterplan and were, in both design and intent, a vitally important feature of Brown's naturalistic reimagining of the estate. The subsequent intensive use of the driveway as the principal arrival point from London and from Brunel's train station elevates its contribution to the significance of this heritage asset. The vestiges of the tree lined estate road up to the park still indicate the sense of anticipation and then the feeling of arrival that would have been experienced by travellers into Nuneham Park and House.
- 6.6.** Despite the significant harm already caused by the presence of C20 CSC, Culham 1 industrial estate and various electric power infrastructure, these elements are still legible within the protected Registered Park and Garden (RPG) and beyond, and assist appreciating and understanding of its significance. The available recording and research of the elements of the original designed layout of the Park dating to the 18th and 19th centuries describe in some detail to allow an in-depth appreciation of their meaning and importance.
- 6.7.** The green undeveloped nature of the appeal site is rare evidence of the pre-C18 rural agrarian hinterland. It historically provided the immediate context of the estate and is still perceived as such, despite additional development and infrastructure, or changes in ownership. Remnants of this vast historic agricultural landscape, especially within the immediate proximity of the RPG, are rare and therefore can be given greater significance through the contribution they make to the immediate green setting.
- 6.8.** The Park was carefully designed and laid out in an Arcadian naturalistic manner, which still dominates its character and appearance. Such design choice requires a degree of continuity with its surroundings, unlike a more formal park
-

---

style that may not necessitate such integration. There were (and are) designed views into the Park such as views on approach to Abingdon Lodge and along Abingdon Drive and its wider open swathe of land setting as one of the principal entrances into the Park. This brings the appeal site more firmly within the setting of the Park than if there had never been any connection.

- 6.9.** There are places within the Park where the surrounding agricultural landscape strongly contributes to views out; and there is an extensive stretch of public right of way outside the Park which now affords elevated and dynamic views in.
- 6.10.** The southern portion of the RPG, open to views from PROWs, has typical Brown landscape characteristics: it comprises open expanses of turf, irregularly scattered with individual trees and clumps, and we know that it was previously surrounded by an internal and an external perimeter belt. The former appeared on Brown's plans and the latter pre-dated it.
- 6.11.** The present boundary of the Park has lost its outer tree belt and has softly merged with the countryside. Its trees and woodland, designed and laid out in a naturalistic manner, can currently be distinguished as such by anyone unfamiliar with designed parkland.
- 6.12.** The impression of the rolling parkland with clumps of mature trees placed within the pastures continues up to Thame Lane incorporating the land beyond the designated and historic edge of the Park. The pasture provides a seamless natural transition of the laid out parkland into the more agrarian wider countryside.



**Fig.14 – View to the RPG from permissive path gateway with the appeal site in the foreground. It is difficult to distinguish where the RPG stops and the countryside begins**

- 6.13.** The view from Thame Lane (Fig.14) and from Oxford Green Belt PROW currently reveal the edge of the park and its planting composition in a spectacular open manner allowing appreciation of the remnants of the internal tree belt planting within the Park. I consider such opportunistic views as part of the evolution of the Park better revealing its significance.
- 6.14.** The view looking back from the location of Abingdon Lodge on the edge of the RPG opens up a spectacular rural vista all the way to Abingdon (Fig.15). This



would have been enjoyed by the travellers leaving the park through the southern driveway.



**Fig.15 – Long rural vista of Abingdon’s St Helen’s Church spire from the Abingdon Lodge entrance location, with the western portion of the appeal site in the foreground. STRAT9 development and intervening screen planting would be placed midway. Foreground will be dominated by the Appeal Scheme and its compensatory planting.**

- 6.15.** The field in the foreground of the photo in Fig.16 is where the significant part of the proposed development would be concentrated flanking the former drive and the gateway with the substation to the east and storage containers to the west.

- 
- 6.16.** I agree that the relocation of the connection tower will result in less incursion into the RPG, and ultimately incur a lesser degree of impact than would be the case with the 'Application Scheme'. However, overall, the proposal due to its nature and siting would still significantly urbanise and subsume the southern edge of the RPG and its former principal gateway.
- 6.17.** Whilst there is some merit in the idea of restoring the curtilage and the planned form of the RPG on the historic parish boundary, for this to be so it ought to be executed authentically and completely.
- 6.18.** The proposed planting is far from its faithful reinstatement. It is described as a woodland but visually it would not resemble that. The proposed planting is neither informed nor driven by the Parkland Management Plan, which in fact advocates reopening of Abingdon Drive as the main entrance into the park (Recommendation 119 of the Management Plan, p7). The appeal scheme would completely scupper this objective.
- 6.19.** The currently proposed planting and hard landscaping scheme is discussed at length within the Council's Landscape PoE prepared by Ms Anne Priscott so I shall not repeat it here. Regardless of any modification or agreement in terms of detailed soft and hard landscape scheme, compensatory landscaping is likely to be perceived as an unrelated and fragmented area of planting, the main purpose of which being to screen the battery storage and the associated infrastructure. The belt does not extend far enough, and the planting intentionally avoids areas beneath the pylons. This indicates that at best there would be several planting groups surrounding the battery storage and the substation, rather than a continuous perimeter belt.
- 6.20.** The cumulative impact of many successive developments in the setting of the RPG is a realistic threat: significantly damaging yet hard to contain. In the
-



---

context of multiple ownership, high-pressure for development and its large size it appears that the park setting is constantly the target of planning applications. The result of a steady trickle of what may appear relatively minor changes is creeping, insidiously growing to a point where it causes major irreversible damage to the design, including views and setting.

- 6.21.** More specifically, the Appeal Scheme, taken together with the current STRAT 9 and STRAT8 allocations, will affect the wider hinterland setting enclosing, intensifying the density and increasing the scale of development surrounding the RPG. The setting of the historic park has already been harmfully impacted, and it makes it even more important to protect the historical rural landscape retained outside all these allocations.
- 6.22.** In the future, the southern edge of the park will also be experienced by considerably greater numbers of people given the nature of the nearby strategic allocations seeking to bring around 3,500 homes and 7.3 ha of employment to STRAT8 and STRAT9. The proximity of PROWs and the Park is likely to draw a lot of people to the southern edge of the RPG. Some of the structures are proposed to be retained in perpetuity, and the rest retained for 40 years. This is a generation-long period within which enjoyment and appreciation of a nationally significant asset would be substantially diminished.

## 7. SUMMARY OF ASSESSMENT

- 7.1.** The exceptional significance of the gardens and landscape of Nuneham House is recognised by its Grade I listing in the Register of Parks and Gardens of Special Historic Interest. Heritage values attributed to the RPG as a heritage asset are complex, vast and interrelated.

- 
- 7.2.** It is clear that the southern portion of the parkland is a highly important component of its heritage significance, possessing historical, evidential, communal and aesthetic value. The changes, caused by natural processes, as a response to change of the ownership and use, and the subsequent modern day developments within and on its fringes have resulted in a severely compromised setting and partial loss of the legibility of this space within the context of the wider Nuneham House Estate. Such losses make the remaining areas of setting that do make a positive contribution more precious.
- 7.3.** The Appeal Scheme would continue and significantly exacerbate the adverse effects of unsympathetic phases of change, contrary to the requirements of policies ENV6 and ENV10. These policies aim to ensure that new development retains and better reveals the attributes and elements which reflect and embody the heritage values attached to assets.
- 7.4.** I find that considerable harm would result to the significance of the RPG through development within its immediate setting especially in view of the chosen location for a major part of the Appeal Scheme to be placed hard up against one of the oldest and principal gateways into Nuneham Park.
- 7.5.** In my assessment, the Appeal Scheme would have a negative impact on several morphological elements of the original designed layout of the Park dating to the 18th and 19th centuries. These elements are still legible within the protected landscape and beyond, and assist in better appreciation and interpretation of its significance.
- 7.6.** The spatial arrangement of the wider setting that would be harmfully affected includes the historic south drive to and from Nuneham House, the traceable location of the lost gateway buildings (Abingdon Lodge), and the remnants of the former estate road beyond the boundary of the RPG that connected the park
-

---

with another heritage asset Culham train station and its Grade II\* listed ticket office (Fig.4).

- 7.7.** I consider that the significance of the affected components of the RPG and the contribution of the wider setting to it is underestimated. The supporting HIA whilst clearly based on a detailed and professional research of origins and evolution of these elements, does not at length deliberate about the importance or meaning of this historic principal arrival point into the park, or the contribution its wider setting makes to the understanding and better revealing of this significance.
- 7.8.** The focus is superficially placed on the intervisibility of heritage assets with the appeal site, considering the screening characteristics of the mitigation planting. The planting is also offered as a heritage gain of the restoration of a stretch of historic woodland/parkland within the southern extent of the RPG. However, the proposed planting does not constitute a faithful restoration of a lost feature, nor would it be fully complete. Such partial re-instatement should not be presented as an authentic part of a place.
- 7.9.** The restoration of isolated parts of the former continuous mature tree belt in segments and to an approximate position as proposed, would produce an apparently historic entity that had never previously existed, which would lack integrity.
- 7.10.** Furthermore, the proposed replanting would obscure the now established and rare panoramic open views into the parkland, which allows the significance of this designated heritage asset to be better appreciated by the wider public. By closing off such views with a group of trees at the western edge of the appeal site, in a historically inaccurate location would reduce the RPG's aesthetic and community value. In my view, a partial and unauthentic restoration to some
-

---

earlier stage in its evolution would not outweigh the loss of public views that would be lost.

- 7.11.** In my assessment, the Appeal Scheme would appear completely at odds with the unspoilt open qualities of the surrounding countryside and would detract from the rural landscape setting of the parkland. The appeal site visually provides a natural transitional continuation of the parkland into the agrarian countryside. The Appeal Scheme would substantially and harmfully alter this relationship. This is the last area of the route of the historic southern approach drive which has not been largely urbinised and its development as proposed would irrevocably remove the final piece of the rural setting to the parkland when approached from the south.
- 7.12.** The extent of Culham Science Centre (CSC), the presence of which is used to justify visual harm, is currently contained and is positioned to the side of the open southern edge of the Park. CSC sits behind Furze Brake which largely contains and shelters it, especially in views from north-east and south-west. Its presence would not mitigate the harm which would result rather it would exaggerate the presence of the CSC by effectively bridging the undeveloped gap and creating the appearance and sense that the appeal site forms part of the CSC which then extends to the edge of the RPG.
- 7.13.** The proposal would result in harmful impacts through the insertion of a densely developed form of major development sprawling across a large area with a jarring industrial character completely at odds with the much valued rural, open landscape setting of the RPG. It also would be perceptibly sprawling into the last remaining section of the open countryside, beyond the well defined edge of the CSC.
- 7.14.** Such change would almost completely enclose the edge of the RPG and merge
-

---

the Park with the existing and future developments. The site was deliberately not removed from Green Belt during the strategic allocation process to protect the setting of the RPG. South Oxfordshire Local Plan (2025) Inspector's report (CD6.6) paid particular attention to the desirability of protection of the setting to the south of the park. It said about STRAT9 (PG 29, para 124): *"The Grade I registered Nuneham Park and Garden lies east of the site, but again there is sufficient space within the site allocation to provide greenspace and a strong planted boundary to avoid any significant effect on the setting of the garden or the designated views from the garden over the River Thames. STRAT9 requires the masterplan to ensure that the setting of these heritage assets is respected"*.

- 7.15.** Within the context of a much wider periphery of the park, the southern edge has a greater level of contribution to the significance of the asset in cultural, communal, aesthetic and historic terms than some other RPG boundary locations. Accordingly, greater weight should be reasonably placed on the desirability of its protection.
- 7.16.** The Site Selection Report (CD1.1.47) identifies several alternative locations for BESS, which appear to be less harmful to the setting of the RPG (Fig.17).



**Fig.17 – Alternative sites locations (CD1.1.47)**

- 7.17.** IS1 is located within the CSC boundary so its presence would be much more contained and related to the already existing development on site. I also note that a smaller capacity BESS development has already been accepted in this location. IS2 is set further away from the boundary of the RPG with the intervening east edge of CSC in between. It would bring development closer to Clifton Hampden Conservation Area and several listed buildings within it, but the intervening Abingdon Road and the location within the established mature field boundaries is likely to more successfully mitigate its presence.
- 7.18.** The NPPF advises that when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed through development within its setting.

- 
- 7.19.** Contrary to the requirement of SODC Policy ENV6, the proposal would not be sensitively designed and would cause harm to historic environment. The significance of the heritage asset and setting would not be conserved or enhanced. The Appeal Scheme would not make a positive contribution to local character and distinctiveness or provide a viable future use for a heritage asset that is consistent with the conservation of its significance.
- 7.20.** Contrary to the requirements of SODC Policy ENV10, the proposal would fail to conserve or enhance the special historic interest, character or setting of the RPG. The resulting harm and loss of significance is not supported by clear and convincing justification.
- 7.21.** Consideration of wider public benefits are contained within Planning Proof of Evidence by Mr Reynolds.
- 7.22.** In this instance the affected heritage asset (Grade I RPG) possesses the highest level of significance. Considerable harm to the significance would derive from the proposed large scale industrial development that would have significant visual and spatial presence and would sever the last link between the asset and its original setting at the principal southern entrance into the park.
- 7.23.** In the context of the NPPF, Appeal Scheme would result in less than substantial harm. In my assessment, for the above reasons, the level of this harm should be placed on at least the medium magnitude of the spectrum.

**Sasha Berezina BA(Hons) MA MRTPI IHBC**

Director | Context Planning

