
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

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

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1. INTRODUCTION

Qualifications and Experience

- 1.1. This is a summary of my Heritage Proof Of Evidence (PoE) prepared on behalf of South Oxfordshire District Council (SODC) in relation to the above appeal.
- 1.2. 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 have over 15 years of professional experience working in Local Planning Authorities and private sector as a planning and conservation specialist.
- 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. I am a fully chartered member of the Royal Town Planning Institute (RTPI) and a full member of The Institute of Historic Building Conservation (IHBC). My full qualifications and experience are set out in Introduction chapter of my main PoE.

Scope of this evidence

- 1.4. The evidence presented within this summary proof is solely concerned with matters associated with the assessment of the potential impacts 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.
- 1.5. This evidence has been drafted as a response to the Reason for Refusal 3:

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.

- 1.6. The evidence that I have prepared and provided for this inquiry is true and has been prepared and is given in accordance with the guidance of my professional institutes. I confirm the opinions expressed are my true and professional opinions, irrespective of by whom I am instructed.

2. SUMMARY OF KEY POINTS OF ISSUE

Heritage significance

- 2.1. Nuneham Courtenay Registered Park and Garden (RPG) is a heritage asset of highest significance considered to be of exceptional special interest and national historic importance. This heritage asset embodies evidential, historic, aesthetic and communal heritage values which are complex, vast and interrelated.
- 2.2. In the main PoE, I evaluate the historical development and the heritage significance of the southern portion of the parkland, along with several designed elements of the former principal southern arrival point. I conclude that this area

constitutes an important component of the RPG's heritage value.

- 2.3.** I also discuss the history of the wider setting arrangement affected by the Appeal Scheme. This includes the historic south park and drive to and from Nuneham House; the former perimeter tree belts; 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.
- 2.4.** Creation of the southern entrance and drive was a design decision by Harcourt which necessitated repositioning of the pre-existing Abingdon Road. The entrance and the drive pre-date Capability Brown's masterplan and were, in both design and intent, a vitally important feature of his naturalistic reimagining of the estate. There are several other visible components of the park that were evidently designed, such as views on approach to former Abingdon Lodge and Abingdon Drive, and their wider open swathe of land setting as one of the principal entrances into the Park.
- 2.5.** The subsequent C19 intensive use of the driveway as the principal arrival point into the estate from London (via Brunel's Grade II* train station) elevates its contribution to the historic 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 many travellers into Nuneham Park and House.
- 2.6.** I find that, although the affected portion of the RPG constitutes a relatively small and modified portion of the extensive heritage asset, the appeal site as part of the setting, possesses a notable importance and greater level of sensitivity compared to other peripheral areas on the boundary of the park. It both contributes to the significance of the heritage asset and allows for it to be
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appreciated.

- 2.7.** I consider that the significance of the affected components of the RPG and the contribution of the wider setting to it is underestimated by the appellant.

The contribution of the appeal site and the effects of the scheme

- 2.8.** In my assessment there are two aspects to the impact on the setting and consequently upon the significance of the Park – historical and visual. I find that considerable harm would result to the legibility of the designed spatial arrangement and to the visual qualities of the RPG's setting.
- 2.9.** 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 separating the RPG from the land allocations. The elements of the arrival route are still legible within the protected RPG and beyond, and assist in appreciating and understanding of its significance.
- 2.10.** The appeal site overlaps the last section of the route of the historic southern approach drive which has been largely unaltered and its development as proposed would irrevocably remove the final piece of the rural setting to the parkland when approached from the south.
- 2.11.** The Park was carefully designed and laid out in an Arcadian naturalistic manner, which requires a degree of continuity with its surroundings, unlike a more formal park style that may not necessitate such integration. The green undeveloped nature of the appeal site historically provided the immediate context of the estate and is still perceived as such. Such survival of a vast historic agricultural landscape, especially within the immediate proximity of the RPG, is rare and therefore can be given greater significance through the contribution it makes to

the immediate green setting.

- 2.12.** Currently, 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.
- 2.13.** The views from Thame Lane and from Oxford Green Belt PROW 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. I consider such opportunistic views as part of the evolution of the Park better revealing its aesthetic value and significance. The Appeal Scheme would urbanise and obscure such panoramic views enjoyed by the public at large.
- 2.14.** The Appeal Scheme would appear completely at odds with the natural transitional continuation of the parkland into the agrarian countryside.
- 2.15.** The views from the park into the wider countryside are also notable. Particularly affected would be the perspective from the former entrance/exit point towards Abingdon's St Helen's Church spire. This long rural vista from the Abingdon Lodge entrance location includes the western portion of the appeal site in the foreground. This is where a significant portion of the development would be concentrated flanking the former drive and the gateway appearing as an urbanising form of development.

Proposed mitigation

- 2.16.** The proposed mitigation 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. The appeal scheme would completely scupper this objective. Any restoring of the curtilage and the planned form of the RPG on the historic parish boundary ought to be executed authentically and completely.

- 2.17.** The proposed screening is not a faithful restoration of a lost feature (outer perimeter tree belt), nor would it be fully complete. It would not resemble a woodland and 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.
- 2.18.** Such partial re-instatement should not be presented as an authentic part of a place. 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.
- 2.19.** The proposed replanting would obscure the rare panoramic views into the parkland, diminishing the significance of this heritage asset. Closing off these views with trees at the western edge of the site, in a historically inaccurate location, would reduce the site's aesthetic and community value. A partial and unauthentic restoration to an earlier stage would not justify the loss of public views.

Alternative sites

- 2.20.** Within the context of the much wider periphery of the park, the southern edge has a greater level of contribution to the significance than some other RPG

boundary locations considered as alternative sites. I briefly consider sites IS1 located within the CSC boundary and IS2 which is set further away from the boundary of the RPG with the intervening east edge of CSC in between. In my opinion, these are viable and less harmful options in terms of heritage impacts.

Cumulative Impacts

- 2.21.** The Appeal Scheme would reinforce negative components of the current experience. Taken together with the current STRAT 9 and STRAT8 allocations, it will affect the wider hinterland setting enclosing, intensifying the density and increasing the scale of development surrounding the RPG.
- 2.22.** 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-

3. SUMMARY OF ASSESSMENT

- 3.1.** 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.

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- 3.2.** 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.
- 3.3.** Consideration of wider public benefits are contained within the Planning Proof of Evidence by Mr Reynolds.
- 3.4.** 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.
- 3.5.** 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

