



CULHAM STORAGE LIMITED

**REBUTTAL BY CHRIS MCDERMOTT (ON BEHALF OF THE APPELLANT) ON LANDSCAPE AND VISUAL MATTERS MADE IN THE EVIDENCE OF ANNE PRISCOTT AND SASHA BEREZINA**

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

**Planning Inspectorate Ref: APP/Q3115/W24/3358132**

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

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

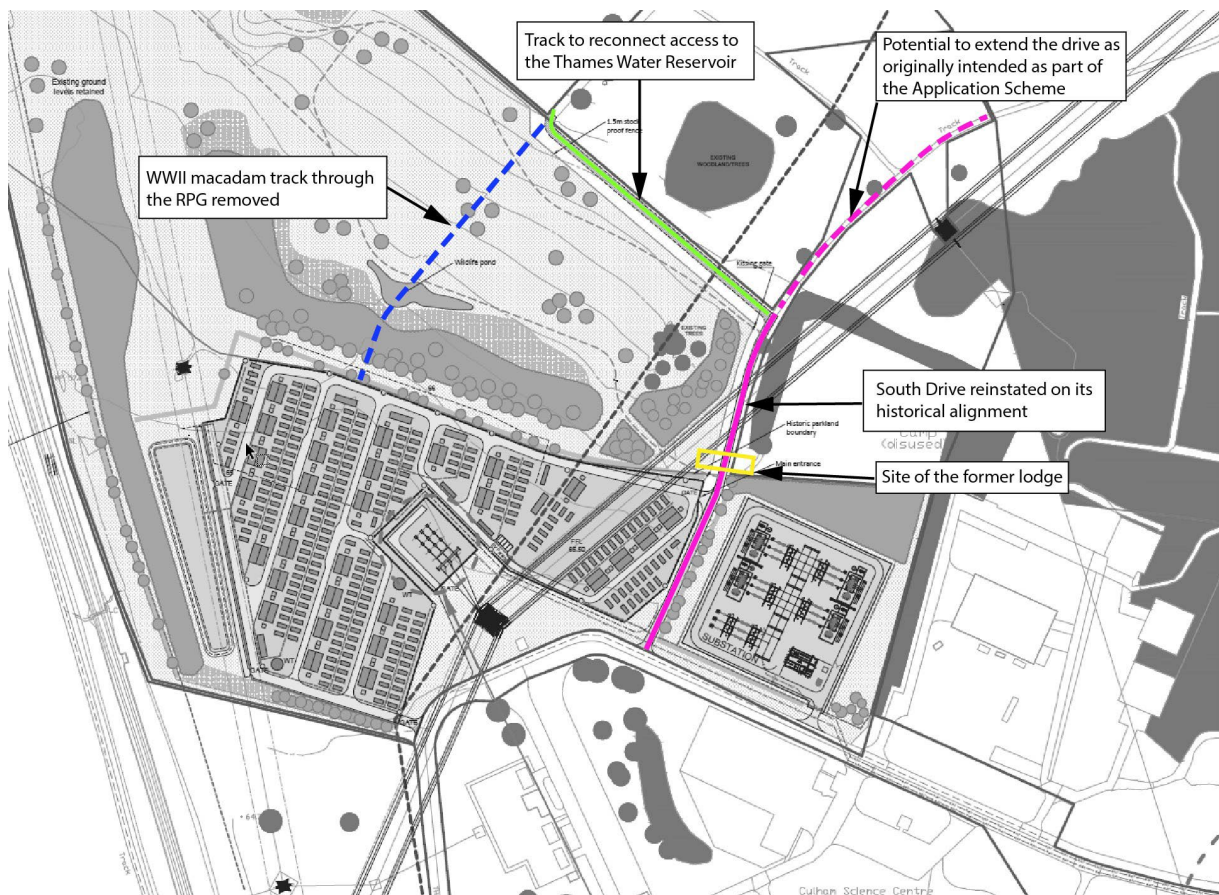
- 1.1. This rebuttal to the landscape evidence provided by Anne Priscott on behalf of South Oxfordshire District Council is a focused document. It is intended to deal only with identified aspects which are considered to require specific rebuttal. The fact that a matter is not mentioned does not mean that it is agreed. In particular, a clear difference in judgement has arisen between the appellant and SODC in relation to the benefits or otherwise of the landscape treatment of the southern edge of the RPG.

### **The Southern Drive and Tree Belt**

- 1.2. SODC places emphasis on restoring the southern Abingdon Drive access into the RPG. While Ianto Wain responds to this in relation to potential impacts on heritage significance, I also provide comment since I prepared the overall site masterplan. The drive extended from Culham Railway Station up to the Abingdon Lodge gateway which marked the entrance into Nuneham Estate, a distance of 1265m. 1174m (92%) was largely removed to construct the airfield in 1944. At the same time the tree belt flanking Abingdon Lodge was removed and the ground between the CSC and the lodge excavated to flat ground for the airfield camp. Abingdon Lodge was demolished in the 1970s. It is no longer possible to restore the 1174m length of driveway that runs through the CSC and Culham 1 industrial area. It is only possible for the public to join the remnant south drive by using the concrete track that skirts the CSC, via the Thame Lane Byway or the Oxford Green Belt way heading west, not from the start of the historical route. The historical direct line route from Culham Station to the Appeal Site passes through Culham 1 and the CSC and provision for this route is not currently provided in the masterplans for these development areas. Within the Appeal Site a 120m length of the drive runs from this concrete track up to the site of the former lodge and the entrance to the RPG.
- 1.3. The Appeal Scheme would reinstate the section of the drive from the CSC to the site of the former lodge and beyond, a total length of 225m, contrary to Sasha Berezina's assertion in her para 7.22 that the Appeal Scheme "would sever the last link between the asset and its original setting at the principal southern entrance into the park". While the reinstated drive would be flanked by the proposed customer substation to the east and the battery compound to the west, these would be temporary and this short section of the drive is already substantially adversely affected by the CSC, the overhead transmission line, the former airfield camp earthworks and an industrial unit. It is also notable that the section of the southern drive from the railway station to the lodge was not included within the RPG listing. Removal of the BESS after 40 Years would leave the historic driveway entrance intact.
- 1.4. The arrival to the park was designed as a series of experiences; travelling up to the woodland edge, which defined the boundary and screened the park from view, arrival at the lodge making an impressive formal gateway and then passing through where the parkland was then revealed to the visitor as a informal recreational landscape of trees and grass, distinct from the structured

working farmland that originally surrounded it. Restoring the drive would be somewhat meaningless unless the boundary woodland feature to recreate, as far as is possible, the design intent was also reinstated. The Appeal Scheme will deliver this. The Appeal Scheme would not prevent the reconstruction of the lodge, if there was an opportunity to do so in the future or extend the drive (the Application Scheme extended the drive further into the RPG to provide access to the point of connection compound within the RPG). The opening up of the southern drive allows the removal of the WWII track which awkwardly bisects the west facing slope of the RPG, another benefit. These changes are illustrated in Figure 1.

**Figure 1: Proposed Appeal Scheme alterations to the tracks within the RPG**



- 1.5. The SODC case considers that the layout of the proposed tree belt is not an accurate reinstatement. However, it must be recognized that the parkland and its immediate environment have been substantially affected by the development of the former airfield land and the transmission lines which pass through. It is therefore not possible to plant the woodland exactly within the areas shown on the historical maps. The 20th century changes to the landscape immediately to the west of the parkland and future changes such as STRAT9 make the need for enclosure more pressing.

- 1.6. Paragraph 7.10 of Sasha Berezina's PoE states that "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". It seems odd that it would be thought preferable for this historical inaccurate landscape to persist rather than accept minor adaptations to the historical tree line to accommodate the transmission lines.
- 1.7. In my view it is more important to respect the internal setting of the RPG and the views from within it, since it was designed to be enclosed. There was no intention that the wider world would be able to look into this private space. As the visualizations indicate the setting of the southern slopes of the RPG are substantially adversely affected by existing development, and in time by STRAT9. It is more important than ever to reestablish the enclosure.
- 1.8. The aerial photograph taken circa 1930 and presented as part of Figure 12 in Sasha Berezina's PoE clearly shows the perimeter tree belt as a substantial enclosing feature to the parkland. While ideally the avenue approach through an agricultural landscape would remain, it has been lost with no realistic chance of restoration and with further incursion of urban development. Re-establishing the tree belt as best as can be achieved, even if not faithfully accurate, is the best course of action to protect the setting of the parkland.

**Figure 2: Aerial Photograph of the Site circa 1930.**



- 1.9. Reference has been made to the future large population that will be able to appreciate the parkland from a short section of the Oxford Green Belt Way, but the Appeal Scheme will allow people to enter the RPG along the short section of restored historic southern drive and enjoy an extensive part of the RPG. The landscaping will have had time to establish before STRAT9 west of the railway is significantly occupied, limiting the visual intrusion of the electrical infrastructure.
- 1.10. In her main PoE, Paragraph 63, Anne Priscott draws attention to the fact that Figure 19 in the Sightline LVIA Appendix A shows a proposed permissive path connecting the Thames Lane Byway (PRoW 183/4, OGBW) as it skirts the CSC with PRoW 317/2 (part of the OGBW by Keeper's Cottage). Essentially following the route of the South Drive. While the Appellant is able to provide the route up to the change in ownership boundary, she has correctly identified that no agreement has been made to continue it through Nuneham Park to complete the link. Consequently, this permissive path is no longer offered, and this is reflected in Figure 13 in Appendix 2 of my PoE. Permissive access to the RPG via the South Drive is retained.

### **Comments on the detailed landscape design**

- 1.11. Anne Priscott also makes a few comments on the detailed design. The first is on the fencing and tree guards and she considers the tree guards and post and rail fencing inappropriate, stating a preference for metal fences and guards (Paragraph 68). While these could be substituted for metal as a matter of detail they were specified because metal fencing is normally associated with the immediate environs of the house and more formal areas. The Nuneham Estate parkland Management Plan recognizes that stock proof fencing is appropriate within the wider estate. While the Visualisations show a post and rail fence the annotation on the masterplan is for a 1.5m high stock proof fence, which is post and wire mesh. Newton Park in Bath, owned by the Duchy of Cornwall, sits within a Capability Brown landscape and has metal fences near the house but within the wider estate farmland trees are protected with split oak/chestnut tree guards and fences are a variety of traditional stock proof post and wire or rustic post and rail fences. The tree guards proposed within the Appeal Site are to protect the trees from the public and would be removed when the trees are sufficiently tall and robust. The stock fence is to delineate the publicly accessible area and would be removed on decommissioning.
- 1.12. Comments are made on the species of trees specified. The species specified are largely appropriate to the parkland, the choice informed by the remnant trees recorded in the arboricultural survey. Adjustments to species and species mixes are often made when satisfying Landscape Conditions. The Nuneham Estate Parkland Management Plan identifies the extensive loss of parkland trees over the years and proposes substantial replanting in the parts of the RPG

covered by the Management Plan. The Appeal Scheme will deliver similar benefit.

- 1.13. Comments are made on the Visualisations in Paragraph 85. The acoustic fence is visible, but it has been weathered to a silver grey, as it naturally would, similar to the colour of the bare branches. It therefore does not appear prominent in the images.
- 1.14. Comments are made that the hedge planting along the railway (Paragraph 86) is uncharacteristic of the landscape. The hedge is specified, partly for biodiversity gain but also because a managed hedge can for a densely branched feature which forms an effective screen when combined with woodland behind, ensuring the BESS is screened in winter. It is accepted that the BESS will restrict views into the parkland, but it was never the historical intention that the parkland would be open to the surrounding countryside. Hedges are a feature of the landscape (Thame Lane for example) and were evident within the historic agrarian landscape (see Figure 2).
- 1.15. Comments are made on the timescales for the mitigation to become effective. In my opinion, it is important that the landscaping is implemented and looked after so that it does eventually establish to leave the legacy of restoration of the RPG. We have to be patient. Oak, lime and chestnut are historically appropriate but can be slow growing, and so a mix of faster growing nurse crop trees are specified within the woodland mixes, such as birch and aspen. Climate change means that trees which once thrived in Capability Browns time may not thrive today and good practice is to plant a wider range of species as insurance for future conditions.
- 1.16. If the Appeal Scheme does not proceed, then it is unlikely that this part of the parkland will be restored, rather it will fall into further decline as the historic tree groups senesce, and no succession planting is carried out.

### **The Nuneham Estate Parkland Management Plan**

- 1.17. Sightline Landscape tried to obtain a copy of this document, first from the landowner of the part of the estate where the Appeal Site lies, LEDA Properties, but LEDA was unaware of its existence. We then approached Askew Nelson, the landscape consultancy which prepared the plan and was told that it only made detailed landscape recommendations for land owned by the Nuneham Estate and not the Appeal Site. I was advised that it was a private document, requiring the consent of the Nuneham Estate before a copy could be shared with Sightline Landscape. After contacting the estate Askew Nelson informed me that the estate was unwilling to release the document. Since I had ascertained that it made no detailed recommendations for the LEDA land, I did not pursue it further.

## **Openness**

- 1.18. Submissions will be made on the legal definition of 'openness' which is well understood as a result of legal decisions. Regarding the openness of the Green Belt (Paragraph 110 onwards), my view is that the notion of 'openness' appears to have been taken too literally. It is not the intention of the policy to necessarily encourage wide open views across Green Belts. Woodlands are a feature of Green Belt and woodland planting initiatives within Green Belts are commonplace. The legacy woodland planting within the Appeal Scheme will make this part of the Green Belt more robust in its ability to preserve a sense of openness from the existing and proposed urban development in the immediate vicinity.

## **Landscape Value**

- 1.19. In my opinion, the local landscape does not constitute a Valued Landscape for the purposes of NPPF paragraph 187 (a) (CD 1.2.3). Anne Priscott assesses it as being of High to Moderate High value and consequently a Valued Landscape worthy of a higher level of policy protection.
- 1.20. In her PoE, Anne Priscott does not define the extent of landscape area for which she is determining value, but it seems from references in the text that she includes the Appeal Site, the RPG, the CSC, STRAT9 and the Thames valley. Having drawn her positive attributes from the wider landscape to determine High to Moderate High value she then narrows her assessment to the Appeal Site which demonstrates fewer of these attributes but she considers it to be of High Value nevertheless. In my opinion the Appeal Site is too small to be assessed and valued separately and it should be viewed in its wider context. I disagree with many of the positive attributes that she assigns to this wider landscape.
- 1.21. My opinion is that the area covered by the Appeal Site, the CSC and STRAT9 should not be considered as a Valued landscape. The majority of the features within it can be viewed from the west facing slope of the parkland. It is a varied and disparate landscape as Viewpoints 1a and 1b illustrate in the Summer Visualisations. While an assessment of landscape value goes beyond just the visual, the visual elements within it give clear clues as the nature of other aspects. For example, regarding tranquility, there is noise from the railway, the overhead lines frequently buzz and crackle, there is noise from within the CSC, including from the substation. On event days there is noise from the motocross track and while this is set out as a recreational benefit, it conflicts with quiet enjoyment of the countryside. The build out of STRAT9 will further reduce any sense of tranquility. While there are cultural associations with the former airfield it has resulted in damage to the historic landscape and urbanization as the CSC. It is my opinion that we should acknowledge this damage, and restore the landscape as best we can and not seek to protect it by incorrectly according it the additional policy protection given to a Valued landscape.

### **Effect on visual amenity and cumulative effects**

- 1.22. I maintain my position on visual amenity and cumulative effect issues. The key issue is that some of the planting is purposefully designed to block views in and out of the RPG to restore its historical context and so is a benefit not a harm. This will also protect the RPG in the long term from the cumulative effects of STRAT8 and STRAT9.

### **Inspectors' Site Visit**

- 1.23. I have reviewed Appendix X of Anne Priscott's PoE and have suggested a slight alternative route which would allow the Inspector to view the Appeal Site more extensively before walking deeper into the RPG. The route is attached as Figure 3.



