



Heritage Matters

Rebuttal Proof

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1 INTRODUCTION

1.1.1 I have reviewed the PoE supplied by Sasha Berezina on behalf of SODC and note that there are some points of significant disagreement between us on points of fact or interpretation of the evidence base.

1.1.2 In particular these relate to:

- The prevention of the reopening of Abingdon Drive as the main entrance into the park, one of the key recommendations of the Parkland Management Plan.
- The potential negative effect upon the historic southern approach and gateway to the park, the site of the park lodge and estate road.
- The contribution of the '*opportunistic*' views into the park from the south upon the significance of the park.

1.1.3 In this focused rebuttal proof, I will address these matters in the order listed above. This rebuttal is deliberately selective and the fact that I have not responded to a particular point does not mean that I agree with it.,

1.2 Reopening of Abingdon Drive

1.2.1 I do not agree with the argument that the proposed scheme would prevent or significantly impede (indeed the word 'scupper' is used in paragraph 6.18) the re-opening of the Abingdon Drive access into the RPG, which is one of the key recommendations contained within the parkland management plan (Recommendation 119 and also cited on p118 of that documents). I would argue that the scheme in fact offers the opportunity to facilitate this goal, which otherwise (the land being out of the control of the estate) would, as the Management Plan recognises be difficult to achieve.

1.2.2 The Appeal Scheme would enable reinstatement of the section of the drive from the Culham Science Centre (CSC) to the site of the former lodge and beyond, a total length of 225m. The line of the reinstated area of drive would be flanked by the proposed customer substation to the east and the battery compound to the west, which it is acknowledged will (during the lifetime of the scheme) temporarily affect its immediate setting. However this setting has already been substantially adversely affected by the CSC, the overhead transmission line, the former airfield camp earthworks and an industrial unit. Any temporary effects on its setting will be outweighed by the opportunity to reinstate the access. There may even be an opportunity to extend the drive further into the RPG as was initially proposed in the Application Scheme. In addition, the opening up of the southern drive allows the removal of the WWII track which awkwardly bisects the west facing slope of the RPG, which will also be a benefit to this area of the park.

1.3 Effect upon the historic southern approach, Abingdon Lodge and Estate Road

1.3.1 I also do not accept that the Appeal Scheme would 'harmfully [affect] 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....Culham train station and its Grade II* listed ticket office' (para 7.6). As stated above, the scheme would not affect the line of the historic south drive. It would also not affect the site of the former Abingdon Lodge or the remnants of the former estate road which linked the park to Culham Train Station. The line of the estate drive was largely removed to construct Culham airfield in 1944 and its line through the CSC is now lost any meaningful link between the station and the park is absent. The scheme will have no effect upon the estate road.

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- 1.3.2 The construction of the wartime airfield also saw the levelling of the land between the CSC and the lodge, further blurring any relationship between the estate road and the park. The lodge building survived the wartime activity but was demolished in the 1970s. It's site is now marked by an area of elevated ground. The site of the lodge building, which sits on the edge of the RPG, will not be affected by the scheme, which will also not prevent the reconstruction of the building should opportunity and ambition to do arise,

1.4 The contribution of the views into the park from the south upon the significance of the park

- 1.4.1 I disagree with the suggestion in paragraph 7.10 that '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'. The original parkland design, with a firm southern wooded boundary between parkland and arable (in place prior to Brown's relandscaping of the southern park and further utilised by him) was at least in part intended to prevent or limit views from the south into the park, with the intention that the parkland landscape, with its landscape of grass and scattered trees, was then revealed to the visitor as they proceeded up the sinuous course of Abingdon Drive towards the house. This is acknowledged in In Ms Berezina's proof (Para 5.3.1) where she accepts that 'the outer tree belt was strategically incorporated into the design to act as a screen delineating the edge of the park' and that The approach road the Abingdon Lodge gateway served as a focal and view point'.
- 1.4.2 The proposed replanting of this boundary is intended,, so far as it possible within modern constraints, to replicate this effect and the opening up of the short section of Abingdon Drive as it enters into the RPG and will facilitate public access into the restored area of parkland at its southern extent. In my view, the significance of the designated asset would be better appreciated by the wider public by allowing, as the Appeal Scheme does, the public to experience something akin to the original experience.. 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 and will increase the benefit of this planting.

1.5 Parkland Management Plan

- 1.5.1 This rebuttal proof includes consideration of the 2019 Parkland Management Plan (Askew Nelson 2019). Attempts were made to access this document during the preparation of the Heritage Impact Assessment in February 2025. We contacted the organisation which prepared the plan (Askew Nelson) but it indicated that it was not able to authorise us obtaining a copy. I am aware that my colleague Mr McDermott also contacted it with the same result. We then contacted Historic England, and it sent us a link to a website (OASIS) which we were advised contained the document but this proved not to be the case. The lack of co-operation in attempting to gain access to the document was disappointing. However, it has now been obtained and has been reviewed as part of this rebuttal proof. The detail and recommendations contained within this document have not amended the opinions and considerations contained in the HIA or my main Proof of Evidence.

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