

Mr Ben Duffy South Oxfordshire District Council Abbey House Abbey Close Abingdon Oxfordshire OX14 3JE Direct Dial: 0207 973 3700

Our ref: P01577936

20 May 2025

Dear Mr Duffy

T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990

LAND TO THE NORTH OF THE CULHAM SCIENCE CENTRE, THAME LANE, NEAR CLIFTON HAMPDEN, OXFORDSHIRE, OX14 3GY Application No. P24/S1498/FUL

Thank you for your letter of 5 June 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The Appeal Scheme seeks to address the concerns raised by Historic England in response to the Application Scheme and amendments have been made. We consider, overall, that the amendments in the Appeal Scheme would result in a small reduction in the level of harm to the significance of Nuneham Courtenay RPG (Registered Park and Garden). In our view, that remaining harm would be less than substantial, at below the mid-range, but to an asset of very high significance and as such this harm should be given great weight.

Historic England understands the need for infrastructure to support the transition to net zero energy production in the UK.

We continue to recommend that, owing to the residual harm to an asset of such high significance, serious consideration is given to whether the development could be located elsewhere.

However, if not, then in our view a more sophisticated landscaping scheme should be devised which further reduces harm to significance. We also recommend that consideration should be given to burying the nearby electricity cables and removal of



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pylons, which would achieve a clear heritage benefit in relation to the setting of Nuneham Courtenay RPG.

Historic England Advice

Assessment of the Appeal Scheme

For a summary of the significance of Nuneham Courtenay and surroundings and of the policy context we identify, please refer to our letter dated 10 July 2024 in response to the Application Scheme (also appended to this letter).

In our consultation comments in response to the Application Scheme we raised 4 key areas of concern:

- a) Proposed positioning of Point of Contact (PoC) within the Nuneham Courtenay RPG
- b) Erosion of the separation between the Culham Science Centre area of development and the RPG and thus harm to the ability to appreciate the parkland and estate as a separate, private estate set within the countryside
- c) Proposed bund
- d) Lack of sensitive landscape restoration

In the Appeal Scheme the Point of Connection (PoC) is relocated out of the RPG to south of the southern RPG boundary, which reduces the harm that the Application scheme would have caused to the RPG from being located within it (point a) above).

However, it would, as now proposed, be visible as a feature within the immediate setting of the RPG and would contribute to the erosion of the separation between the industrial-type development of the Culham Science Centre and its environs (point b) above). What remains of the more open, undeveloped fields between the developed areas and the RPG help in appreciating and understanding the parkland as a private estate historically and intentionally located away from areas of development. This separation continues to provide a positive function in our appreciation of the historical design, planting and siting of the RPG despite the acknowledged presence of modern infrastructure.

A further point that relates to the relationship between the RPG and the surrounding landscape, that has been identified by the Council's Heritage Witness, pertains to the mound upon which Abingdon Lodge previous sat: this is a designed elevated position from which one would have exited the RPG and surveyed the landscape in the panorama. In the reverse, approaching along the Abingdon Drive leading up to the grand lodge on the raised mound would have clearly announced the private estate's



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entrance. The remains of these intentional design features are important and allow us to appreciate and understand the design intentions at play.

The Appeal Scheme removes the proposed bund and introduces a partial shelter belt along the southern boundary to the RPG (in response to points c) and d)). This proposed partial reinstatement reflects the recommendations in the Parkland Management Plan (PMP) 2019 but still doesn't satisfactorily achieve the aspiration set out.

This tree planting would extend north at 2 points away from the shelter belt, which appears to be designed to screen views of the overhead electricity cables at the western end and existing and proposed views of the Culham Science Centre and BESS to the south and south-east. Furthermore, the landscape illustrations submitted with the Appeal Scheme suggest a thick tree belt, which doesn't incorporate the PMP 2019 aspiration to recreate the Abingdon Lodge entrance, and a tapered belt to the historical location of the entry point.

Because the proposed landscaping could never be a truly faithful restoration should the BESS gain permission, it has only limited benefit in the context of this application, but it does provide the opportunity for some, limited improvement to the parkland and wood-pasture character of the southern end of the RPG. Should the Inspector be minded to approve the proposals, we strongly recommend that the details of the landscaping are further refined and agreed with South and Vale District Council via condition to achieve something which better reflects the PMP 2019 aspiration.

Overall, there would, in our view, be some limited benefits from the proposed landscaping of the Appeal Scheme, and it would result in reduced harm from the Application Scheme. However, residual harm remains because the restoration cannot fully achieve the PMP 2019 restoration.

The proposed development would also remove the possibility of reinstating the lost southern driveway, another aspiration of the Parkland Management Plan 2019, through developing on its route. It is hoped that redevelopment of the STRAT9 area (allocated for redevelopment in South Oxfordshire Local Plan 2035) would seek to respond positively to this aspiration in the PMP 2019, and the Appeal Scheme would truncate and prevent that being achieved in its entirety.

In support of this, the live outline planning application reference P24/S1759/O indicates a clear intention to allow a routeway north-south, thus incorporating elements of the PMP 2019 aspirations. To be clear, reinstating the driveway would be a clear heritage benefit because it would improve the setting of the Nuneham Courtenay RPG and aid our appreciation and understanding of the once main route to



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the historical estate, enhance our ability to experience the designed entrance and route towards and then through the estate, and its links to road and rail infrastructure.

The Site Selection Process document submitted with the appeal indicates 3 alternative sites. Though not considered in detail it appears possible that sites IS1 and IS2 would result in lower level of harm to the RPG, and that IS3 would be marginally less harmful to the RPG by avoiding development over the historical Abingdon Drive and interfering with the Abingdon Lodge mound view out across the adjacent landscape.

Regarding cumulative impacts, in our response to the Application Scheme we flagged possible concerns regarding the cumulative impacts on Nuneham Courtenay RPG of nearby solar farm applications, including live application reference 'Land North-West of Nuneham Courteney situated to the West of the A4074 North of Upper Farm and South of Lower Farm, Application No. P24/S1336/FUL'. Our response to this application concludes that, whilst we consider some information may still be missing from the application, based on thet information available, the impact of the proposals would be less than substantial, at the lower end of the scale. In reaching a decision on this proposal great weight should be given to any harm that would result to the Grade I Nuneham Courtenay RPG and the Grade II* All Saints church within it. Any other relevant cumulative harms should be taken into account.

<u>Conclusions</u>

The Appeal Scheme removes the key harmful feature within the RPG from the Application Scheme, the Point of Connection, which thus reduces the harm to Nuneham Courtenay RPG.

The Appeal Scheme removes the proposed alien bund feature and introduces a tree belt along part of the southern boundary. The bund removal helps to reduce the harm proposed in the Application Scheme.

The proposed tree belt is welcomed, though currently still misses the opportunity to provide a more faithful restoration of this feature.

The presence of the proposed BESS and PoC within the green space between the Culham Science Centre and estate boundary would harm the significance of the RPG through eroding its clear sense of separation from nearby developments, and prevent the PMP 2019 aspiration to reinstate the main historical route to the estate vis the now lost Abingdon Lodge.



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Therefore, clear residual harm to the significance of the RPG (including harm from the negative change to the setting of the RPG) would still result from the Appeal scheme. This residual harm to the RPG would sit at less than substantial below mid-range and as such the Inspector should give due weight to the harm to this highly significant Grade I landscape in their assessment of the appeal.

We urge serious consideration of whether the alternative sites put forward would help achieve a BESS within the area and result in a lower less of harm to a very significant heritage asset.

Where this location is considered acceptable, there continue to be more meaningful heritage benefits that could be achieved to help improve this highly significant landscape, including the burying of cables and removal of the pylons, which would achieve the dual benefit of removing this highly negative feature within the setting of the RPG and allowing more of the perimeter belt to be reinstated. The proposals would result in clear harm to the significance of a Grade I landscape and as such we would expect robust mitigation through meaningful and impactful heritage benefits, such as this.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of the NPPF.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

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