Clifton Hampden Parish Council June 2024
Reference
Location/Description

Date Registered

P24/S1759/O

[redacted]

[redacted]

P24/S1498/FUL

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

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. (A hard copy of the Environmental Statement can be viewed at South Oxfordshire District Council, Abbey House Abbey Close Abingdon OX14 3JE).REPRESENTATIONS IN WRITING BY 28 JUNE 2024

The Parish Council recognises the need for BESS plants to regulate the National Grid but believes that this Green Belt site is unsuitable. The site would be an eyesore affecting views from the Thames path, Nuneham Park and the village. Despite reassurances about the potential fire risk, more information is needed about accessibility for fire engines and hydrants. Release of poisonous gases is another potential hazard which makes this site near the Culham Science Centre and its children's nursery undesirable.

25 April 2024

[redacted]

[redacted]

APPLICATION WEB COMMENTS FORM

Information available for public inspection and available on our website

Location : Land to the north of the Culham Science Centre Thame Lane near Clifton Hampden OX14 3GY
Proposal : 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.(A hard copy of the Environmental Statement can be viewed at South Oxfordshire District Council, Abbey House Abbey Close Abingdon OX14 3JE).REPRESENTATIONS IN WRITING BY 28 JUNE 2024
Application Reference : P24/S1498/FUL - 2

Please complete

Your name :	Culham Parish Council
Your address :	c/o Denise Corney 43 Westfield Road Long Wittenham OX14 4RF
Date :	26 June 2024

Use the space below for your comments

Please see attached comments in uploaded documents on behalf of Culham Parish Council

Planning

HEAD OF SERVICE : Adrian Duffield

South Oxfordshire District Council
Listening Learning Leading

CONSULTATION WITH
CULHAM PARISH COUNCIL

PLEASE RETURN TO SODC NOT LATER THAN 12 NOON ON 17th June 2024

OFFICER : Ben Duffy
CONTACT : Ben Duffy

registration@southandvale.gov.uk
Tel : 01235 422600
Textphone: 18001 01235 422600

Abbey House Abbey Close
ABINGDON OX14 3JE

AMENDED DETAILS

Application Reference : P24/S1498/FUL (Full Application)
Application Type (see definition over) : Major
Amendment : No. 1 - dated 17th May 2024
Proposal : 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.
Address : Land to the north of the Culham Science Centre Thame Lane near Clifton Hampden OX14 3GY

CULHAM PARISH COUNCIL :

SUPPORT this application for the following reasons : ☐

has **a RESPONSE** to this application ☐

OBJECTS to this application for the following reasons : ☒

See attached

Signed on behalf of Culham Parish Council

..... [redacted] .....

17/6/24

CULHAM PARISH COUNCIL OBJECTS TO Planning Application Ref. P24/S1498/FUL

Proposal: 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 (sic) National Grid substation.

Address: Land to the north of Culham Science Centre Thame Lane OX14 3GY

Applicant: CULHAM STORAGE LIMITED

Our understanding of the proposal:

1. A Battery Energy Storage System (BESS). BESS facilities are a key component of the National infrastructure required in the transition of the National Grid to net zero. They '*import electricity from the grid and store it in batteries at times of low demand / high generation, which can then be exported back into the grid at times of higher demand / system stress'* (as per the Green Belt Assessment that accompanies the application, para 3.3). These facilities are important with the increasing reliance on electricity generated from renewable (less predictable) sources (i.e. wind and solar electricity generation).

2. The proposed 500 MW capacity would be: *"one of the largest schemes coming forward since the storage order was enacted in 2020. This means the proposed capacity would be 10 times larger than the previous maximum 49.9 capacity limit to follow the Town and Country Planning Act 1990 process, which was the most common route"* (Green Belt Assessment 9.14). Typically, a BESS has a capacity in the range of 50-100MW.

3. As per paras 2.13, 2.15, 4.5 and 5.10 of the Design and Access Statement (DAS) supplied, the 500 MW facility would occupy 26.8 hectares and involve 296 shipping containers (6.3 m x 2.4 m x 2.8 m) to accommodate the batteries, 37 larger buildings (12 m x 9.5 m x 4.05 m) to accommodate the inverters and transformers, seven control rooms and three shipping containers for storage/welfare. Associated auxiliary works on the site include: access roads and parking areas including removal and upgrading of existing farm tracks; boundary fencing and associated CCTV cameras; three firewater storage tanks; an electricity substation compound protected by 2.5m high steel mesh fencing to the north and west and 4m high timber acoustic fence to the west and south; and one storm water lagoon. (Para 3.7 of the Green Belt Assessment also summarises the development).

5.Directly associated works undertaken by National Grid Electricity Transmission will include a new connection tower, to be built within the Grade 1 Registered Park and Garden in Nuneham Courteney; installation of a high voltage underground electricity cable and an extension to the existing substation within the Culham Science Centre.

6. As per paras 5.22 – 5.28 of the DAS, the construction phase would be over an 18-month period, The construction workforce will peak at 70 personnel. Construction traffic will include 50 Heavy Duty Vehicles per day.

7. As per DAS para 5.29, once installed there will be minimal on-site activity as it will be remotely controlled/monitored.

8. The BESS would be operational for 40 years (DAS 5.33) plus 12 months decommissioning.

Our reasons for objecting:

1. The proposed development is located within the Oxfordshire Green Belt. The main considerations for development in the Green Belt are set out in Section 13 of the National Planning Policy Framework Dec 2023 (NPPF) with substantial weight given to any harm to Green Belt (NPPF para 153). New buildings are considered inappropriate in the Green Belt and renewable energy generation, or storage is NOT one of the listed exceptions (NPPF para 154). The application would therefore need to demonstrate "Very Special Circumstances" to justify development. Para 153 also clarifies that "Very Special Circumstances" will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations.

The Environmental Impact Assessment (EIA) Scoping report already said that there was '*likely significant effects with regards to archaeology, heritage, landscape and visual impact, land take and soils (agriculture) and operation climate change effects'.* See DAS 4.8.

2.Harms:

a) Harm to the Openness of the Green Belt

The proposal comprises inappropriate development that would be harmful to the openness of the Green Belt and would conflict with the stated purposes of the Green Belt, particularly in respect of assisting in safeguarding the countryside from encroachment.

One of the purposes of Green Belt is to prevent urban sprawl. The land on which the BESS is proposed currently provides a green barrier between the proposed new town of 3500 houses in the adopted South Oxfordshire District Council Local Plan 2032 (SODC LP31) immediately to the west of the proposed BESS, and the 73 ha developed site of Culham Science Centre (now Culham Campus). The Green Belt Assessment (eg, para 6.19 and conclusion (10.6) suggests a 'beneficial effect' through reduced views of the existing large buildings on the Campus. This is considered to be inappropriate given that the battery storage containers would be numerous, large and unattractive and, together with the substation, would cover 6.9 ha adjacent to the proposed housing development. (see 3.8 of the Green Belt Assessment). Typically, BESS are sited in remote locations with infrastructure / connection to the National Grid (NG) already in place.

b) Permanent built development within a Grade 1 Registered Park & Garden and Conservation Area.

Part of the proposed development site is located within the boundary of the Grade I Nuneham Courtenay Registered Park and Garden and the Nuneham Courtenay Conservation Area. Notably, the proposed connection tower and compound are located within the Registered Park and Garden. The Green Belt Assessment attempts to propose that the proposed development would result in a '*neutral effect'* on visual impact on the basis that the 15-25 years that it will take for the mitigating landscaping to take effect is '*deemed acceptable'* because '*the creation of parkland landscapes has required patience throughout centuries'*. We find this argument inappropriate. It is considered that the harm should be assessed on the basis of the quality of the existing landscape, particularly given that the life of the development is 40 years. The mitigating effect of proposed landscaping is not expected to result in a significant ameliorating effect until the second half of the life of the BESS.

3. Loss of Best and Most Versatile agricultural land

The site area is 26.8 hectares. As per the Agricultural Land Classification (ALC) study carried out, 79% of the land is Grade 2; and 21% is Grade 3a. Grades 1, 2, and 3a are considered 'Best and Most Versatile' agricultural land which should be protected and preserved following NPPF guidance, paragraph 180 b. The Green Belt Assessment para 108 attempts to claim minor harm claiming that the land would be isolated and set adjacent to an urbanising context and less desirable for agricultural use than other BMV land. This is not considered an appropriate argument given that Government policy is to protect all BMV from significant, inappropriate or unsustainable development proposals. Poorer quality land should be used in preference to higher quality land. The loss of BMV land throughout the lifetime of the proposed development (40 years) has not been justified in the planning application documentation.

4. Significant Impacts to Landscape Character and Sensitive Receptors

Para 8.6 of the DAS states that significant adverse impacts to landscape character will arise as a result of the proposed development *: 'It is concluded that the proposed electrical infrastructure will significantly adversely affect the landscape character of the part of the site in which it lies, and initially and to a lesser extent the character of a small part of Nuneham Park. It is proposed to enhance this part of the parkland, restoring a historical tree belt along the parish boundary …. Although this will take many years to be effective'*. The site is visible from a stretch of the Oxford Green Belt Way and from other Public rights of way. The DAS (8.4) claims it will allow increased public access via permissive paths and new woodland planting, but the timescale is too far in the future and existing Rights of Way (ROW) will be closed and the Oxford Green Belt Way severely compromised by the visual impact of the BESS.

5. Inappropriate Capacity and Scale of the Proposed Development

The application is for a 500MW BESS, "*one of the largest schemes coming forward since the storage order was enacted in 2020. This means the proposed capacity would be 10 times larger than the previous maximum 49.9 capacity limit to follow the Town and Country Planning Act 1990 process, which was the most common route"* (Green Belt Assessment 9.14).

No justification has been provided for a development of this very large scale. Given that the proposed development is located within the Green Belt, and therefore contrary to planning policy, justification of this should be provided within the application.

Whilst Statera state that 'no fire events have been recorded at any of their sites', and the proposal includes 2 fire water storage tanks, the size of the proposed facility is 5-10 times the size of existing battery storage facilities and, with such a large facility there is a potential higher chance of fire risk.

6. Significant Impacts during the Construction Phase, including traffic

The local area will be severely affected by traffic, noise and carbon emissions during the construction which would occur over an 18-month period with 40-50 personnel – and up to c.70 at the busiest times – with construction traffic peaking at 50 Heavy Duty Vehicles per day (DAS 5.26**).** Furthermore this would occur over a relatively long working day. **Working hours are 7am-6pm in winter and 7am – 8pm in summer and include Saturday working hours 7am-1pm** (DAS 8.23. See also Construction Traffic Management Plan (CTMP)para 1.8). A temporary car parking area will also be provided (i.e constructed) for the cars, minibuses and vans.

Cranes will also be required to deliver transformer equipment (weighing 112t). (CTMP 5.7-5.9)

Earthworks for the access tracks and battery bases is the first construction activity, followed by stoning up of the access tracks and construction of the concrete bases. In parallel with the concrete works the electrical infrastructure is installed. Finally, the containers and batteries themselves are to be brought to site, installed and connected.

The construction traffic will access the site via an existing road to the west of the industrial estate (known as Culham No 1 site), currently used as an agricultural track off Abingdon Road, before joining Thame Lane. It will involve upgrading the farm track. Vehicles may also cross the Grade II listed Isambard Kingdom Brunel bridge over the railway cutting.

All construction vehicles – and workers cars/vans/minibuses will approach the site via the A415. This will have a major impact on existing traffic levels and affect road users travelling from/to Abingdon, Clifton Hampden, Culham and the other neighbouring villages, such as Appleford, Sutton Courtenay and Nuneham Courteney,

There are also 3 Public Rights of Way that abut the site that will be impacted by vehicle movements.

7. Cumulative impacts

As per the CTMP 7.1, there is every likelihood that construction traffic for a Fusion Demonstration Plant (P22/S1410/FUL) on land to the NE corner of Culham Campus, which is currently in the planning system, will '*follow the same general construction access routes and could therefore result in cumulative impacts if constructed at the same time'* .

No mention is made of the possibility of the massive infrastructure project, the 'HIF1' roads, bridges, viaduct, Clifton Hampden bypass and associated roundabouts on the A415 which, if approved by the Secretary of State following the recent Planning Inquiry, are due to be completed by 2028 and are therefore likely to be in construction at the same time.

The EIA omits a quantitative and systematic cumulative impact assessment. Given the natura and scale of planned and proposed development within the immediate locality of the proposed development site, such a study is considered essential.

7. Employment benefits negligible

The DAS para 8.4 claims employment benefits. Whilst 40-50 workers will be needed for the construction period DAS para 8.4 (70 at peak times (8.21), during long-term operation (40 years) employment opportunities will be limited to two part-time personnel for maintenance / security checks (DAS 8.4). Monitoring will be done remotely.

8. Omissions in the Environmental Impact Statement

As required an Environmental Impact assessment (EIA) has been prepared to accompany the application for planning permission. There are, however, two notable omissions.

a) The assessment and evaluation of potential cumulative environmental impacts to arise as a result of the planned development of the BESS in association with other planned and proposed developments in the area (e.g. the expansion of the Culham Campus Centre, the HIF scheme/river crossing and the construction of 3,500 new houses (STRAT 9 of SODC LP35) and associated infrastructure etc.) is inadequate. There is no systematic quantitative assessment and evaluation of cumulative impacts or the

consideration of the need for additional mitigation measures to avoid cumulative impacts arising or lessen their significance.

b) Despite the potential for the site to be of archaeological interest, no archaeological field surveys have been undertaken to support the planning application. Rather, these are proposed to be undertaken at a later date. The desk-based assessment undertaken as part of the EIA, concludes that the site is predicted to contain archaeological remains potentially dating to the prehistoric and Romano-British periods. The absence of site-specific survey results potentially undermines the assessment conclusions of the EIA and **the Harm to Heritage Assets cannot be assessed in the absence of this survey.**

8. Site Selection flaws / Alternatives

Whilst we do not disagree that BESS facilities are required nationally**, no justification has been provided of the need to locate a large capacity BESS on GREEN BELT land in CULHAM.**

Alternative sites discussed in the Site Selection document, IS2 and IS3, are both in Green Belt. However,

a) Alternative Site IS1:an area of approximately 5.5 ha and is located within the Culham Science Centre.

The cited local need '*to support the sustainable growth of Oxfordshire settlements and energy hungry science facilities, such as the UKAEA Nuclear Fusion research at Culham Science Centre adjacent to the Site'* (Green Belt Assessment 5.9) is flawed. In 2016 SODC approved a planning application (see planning reference and link below) for a 250MW BESS on land WITHIN Culham Science Centre, land owned by UKAEA. The facility has not been built despite the 2016 application stating '*National Grid requires the ESF facility to be operational by the start of 2018 because: (1) it has a pressing and urgent national requirement to receive tenders for frequency response services, such as from energy storage, to strengthen grid stability over the coming years and (2) its procurement policy constrains how far in the future it can contract for balancing services'*. Whilst the approval may possibly have expired (3 years), if Culham Campus claims a need, they could apply to build this smaller facility within their land which has since been removed from Green Belt.

Ref: P16/S2368/FUL)
https://data.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P16/S2368/FUL
"*Development of an Energy Storage Facility (Sui Generis) comprising: a battery building to house plant, an administrative building, security fencing and landscaping; the excavation of land for the installation of a 250MW High Voltage Transformer; extension to existing electricity substation to provide additional plant equipment and building; and the provision of underground cabling between the battery building, transformer and the substation extension. Location: UK A E A Culham Science Centre near Clifton Hampden OX14 3DB"*

Statera gives the 'reasons' for not using the site today (Site Selection 2.44) as its not being large enough for a 500MW facility; and that they were '*unable to contract with is landowners'* , and that it does not perform any better in heritage and ALC terms. The latter is untrue as the land in the Culham Science Centre was redesignated as a result of the SODC LP 35 and is no longer in Green Belt. As for an inability to negotiate with the landowners, this seems somewhat

unbelievable. The landowner must surely be UKAEA, as per the 2016 application form, and the land remains undeveloped. It seems Culham Science Centre's letter of support for the current application by Statera is a way for them to get HV power and resilience into their site without using their land, pushing a scheme outside their site whatever the harm to Green Belt or the local community, landscape and heritage. A 250MW facility could be built on the 2016 application site and/or

b) Alternative with no impact on Green Belt, open countryside or NC conservation area:

The proposal could be redirected to land adjacent to the Didcot C gas turbine substation where it can offer the same resilience and HV support to Milton Park business park and other industrial and commercial users of electricity, and where the electrical infrastructure is already in place.

Conclusions/summary

Inappropriate development that would be harmful to the openness of the Green Belt and would conflict with the stated purposes of the Green Belt, particularly in assisting in safeguarding the countryside from encroachment.

Significant adverse impact on the Grade 1 Nuneham Courtenay (NC) Registered Park and Garden and NC Conservation Area

Loss of BMV agricultural land throughout the lifetime of the proposed development (40 years) with no justification for this loss provided in the application.

Significant potential for adverse impacts on the existing road users of the A415 and the local town of Abingdon and villages of Culham, Clifton Hampden etc during the construction phase of the proposed development. Further, there is the potential that these impacts may overlap with the continued development/expansion at Culham Campus AND the proposed HIF1 road infrastructure project resulting in significant adverse cumulative impacts.

Need not justified: Culham Science Centre / Campus has an existing approval for a 250MW BESS within its boundaries.

Better alternative sites in other areas of "Science Vale", e.g. the site of Didcot B.

Omission in the EIA: archaeological survey and cumulative impact assessment.

Largest BESS in the country – a potential fire risk next to a site which breeds radioactive Tritium and adjacent to area for planned new homes.

P24/S1498/FUL - Land to the north of the Culham Science Centre Thame Lane OX14 3GY

Grace Lewis [redacted]
Thu 23/05/2024 13:05
To:Planning Registration [redacted]

OFFICIAL

Network Rail
1st Floor
Bristol Temple Point
Bristol
BS1 6NL

My Ref: P/TP24/193
Your Ref: P24/S1498/FUL

Date: 23 May 2024

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

APPLICATION NO: P24/S1498/FUL
PROPOSAL: 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.
LOCATION: Land to the north of the Culham Science Centre Thame Lane OX14 3GY

Dear Sir/Madam,

Thank you for your email dated **14 May 2024** together with the opportunity to comment on this proposal.

Network Rail has no objection in principle to the above proposal but due to the proposal being next to Network Rail land and our infrastructure and to ensure that no part of the development adversely impacts the safety, operation and integrity of the operational railway we have included asset protection comments which the applicant is strongly recommended to action should the proposal be granted planning permission.

SAFETY
Any works on this land will need to be undertaken following engagement with Asset Protection to determine the interface with Network Rail assets, buried or otherwise and by entering into a Basic Asset Protection Agreement, if required, with a minimum of 3months notice before works start. Initially the outside party should contact assetprotectionwestern@networkrail.co.uk.

DRAINAGE
Soakaways / attenuation ponds / septic tanks etc, as a means of storm/surface water disposal must not be constructed near/within 5 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property/infrastructure. Storm/surface water must not be discharged onto

Network Rail's property or into Network Rail's culverts or drains. Network Rail's drainage system(s) are not to be compromised by any work(s). Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property / infrastructure. Ground levels – if altered, to be such that water flows away from the railway. Drainage does not show up on Buried service checks.

GROUND LEVELS
The developers should be made aware that Network Rail needs to be consulted on any alterations to ground levels. No excavations should be carried out near railway embankments, retaining walls or bridges.

LANDSCAPING
Where trees/shrubs are to be planted adjacent to the railway boundary these shrubs should be positioned at a minimum distance greater than their predicted mature height from the boundary. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary. We would wish to be involved in the approval of any landscaping scheme adjacent to the railway. Where landscaping is proposed as part of an application adjacent to the railway it will be necessary for details of the landscaping to be known and approved to ensure it does not impact upon the railway infrastructure. Any hedge planted adjacent to Network Rail's boundary fencing for screening purposes should be so placed that when fully grown it does not damage the fencing or provide a means of scaling it. No hedge should prevent Network Rail from maintaining its boundary fence. Lists of trees that are permitted and those that are not are provided below and these should be added to any tree planting conditions:
Permitted:
Birch (Betula), Crab Apple (Malus Sylvestris), Field Maple (Acer Campestre), Bird Cherry (Prunus Padus), Wild Pear (Pyrs Communis), Fir Trees – Pines (Pinus), Hawthorne (Cretaegus), Mountain Ash – Whitebeams (Sorbus), False Acacia (Robinia), Willow Shrubs (Shrubby Salix), Thuja Plicatat "Zebrina"
Not Permitted:
Alder (Alnus Glutinosa), Aspen – Popular (Populus), Beech (Fagus Sylvatica), Wild Cherry (Prunus Avium), Hornbeam (Carpinus Betulus), Small-leaved Lime (Tilia Cordata), Oak (Quercus), Willows (Salix Willow), Sycamore – Norway Maple (Acer), Horse Chestnut (Aesculus Hippocastanum), Sweet Chestnut (Castanea Sativa), London Plane (Platanus Hispanica).

Yours Sincerely,

Grace Lewis
Town Planning Technician Wales and Western
Network Rail
Temple Point, Redcliffe Way, Bristol, BS1 6NL
[redacted]

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Application Reference : P24/S1498/FUL - 6

Please complete

Your name :	Heritage Officer (South and Vale)
Your address :	Abbey House Abbey Close Abingdon OX14 3JE
Date :	17 June 2024

Use the space below for your comments

Please see attached

Conservation & Design

Vale of White Horse District Council
South Oxfordshire District Council
Listening Learning Leading

Application consultation response

Application reference:	P24/S1498/FUL
Site:	Site north of Culham Science centre
Proposal:	Development for battery storage

Summary

The proposed development would result in significant adverse impacts on designated heritage assets, in particular the Nuneham Courtenay Registered Park and Garden.

Heritage Assets

The application site sits within and in the immediate setting of the Grade I Registered Park and Garden (RPG) of Nuneham House at Nuneham Courtenay. The registered park is a highly significant C18 parkland landscape and pleasure grounds containing a number of listed structures, follies and buildings including the Grade II* Nuneham House.

The development is also within the immediate setting of the Nuneham Courtenay Conservation Area and in the wider setting of the Grade II listed Thame Lane Bridge, the Grade II listed Europa School and the village conservation area of Clifton Hampden.

Discussion

The proposed development is for a large area of shipping containers and inverter houses, laid out in formal lines, containing batteries for energy storage and associated infrastructure. The field of containers will connect to substations within the application site and adjoining Culham Science Centre sub-station. The proposal requires the construction of a 14m high transmission tower compound which is to be built within the designated RPG.

The Desk Based Heritage Assessment in Annex 1 to the Cultural Heritage Chapter of the ES describes impacted heritage assets, with the RPG the most impacted by the proposal. I do not propose to repeat their assessment of significance here.

The application proposes extensive mitigating features including new planting within the RPG atop a large bund structure, new ponds and extensive areas of 4m high acoustic fencing. The application documents suggest this proposed planting has been informed by historic maps and photographs of the parkland which show some areas of planting in this area historically. However, the addition of a bund to elevate the planting a create a larger visual screen of the development from within the designated landscape changes the historic topography of the area and the way in which the edge of the parkland was a softer transition into the open countryside that it joins. It is notable that this area once contained the southern drive to the main house, providing a transition between the agricultural lands and parkland; there is no evidence that a solid raised embankment of planting existed here to screen the surrounding agricultural lands.

I am concerned that the proposed mitigating planting would itself harm the character of the RPG by introducing an alien feature in the form of a raised woodland bank, cutting off the more open arable areas of the parkland from the open surroundings which are experienced both from within the RPG looking out to the south and south-west as well as in open views from towards the RPG.

Notwithstanding the above concerns about the nature of proposed mitigation planting and landscaping works, none of the proposed mitigation can offer meaningful softening to the proposed 14m high transmission tower compound which will be a substantial change in appearance and character of this part of the RPG. The area requires new tarmac road to provide access to the area and a wide area of hardstanding to accommodate the infrastructure. This would be considerably larger in area than the existing pylons to which it is to connect to and to which it has been compared. This tower compound

will be visible from a wide range of aspects both within the RPG and in its setting looking towards the rise of Nuneham Courtenay from public vantage points extensively across the south.

I am very concerned that the harmful impact of the proposal is downplayed in the submitted Cultural Heritage chapter of the ES owing to the assertion that the development is 'temporary'. 40 years of this type of built form should not be considered a temporary change, this is a considerable period of time in which the context of the RPG will be significantly impacted in a negative way. This is also particularly concerning when mitigating planting is not anticipated to be effective for 10-20 years and that the compound will remain a moderate adverse impact on the character of the parkland even after 20 years when the landscaping is hoped to reach maturity (as stated in para8.11 of the LVIA). It is also noted that the proposed transmission tower is not intended to be temporary and that this 14m high structure will be a permanent addition to the RPG. This indicates the proposal will result in a high level of harm to the RPG that proposed mitigation cannot overcome.

The Cultural Heritage chapter notes that there is likely to be a cumulative negative impact to the RPG from both this proposal and the provisions of strategic allocations, the mitigation of which is outside the remit of this application. Paragraph 3.157 of the Cultural Heritage Chapter notes that the development will have significant adverse effects on the designated heritage assets. The statement also notes that there will be a cumulative impact as a result of it adjoining areas of strategic allocations (STRAT9). What the chapter fails to recognise is that areas not removed from the Green Belt (including this application site) and areas of STRAT9 allocated site are set aside to provide Green Belt protection and enhancement to the RPG which the proposed development would fail to achieve. The strategic site allocations here are specifically required to avoid unacceptable visual impact on the RPG (see SOLP Policy STRAT8:1).

I am also concerned that justification is also provided in the form of comparison with the appearance of neighbouring CSC which also shows a lack of understanding of Local Plan Policies which seek to contain built form within the allocated area of CSC in order to preserve and better enhance the setting of the RPG given existing areas of degradation from built form.

Relevant Policy Assessment and Conclusion

This application has been tested against the requirements of the NPPF and Local Plan Policies STRAT6, STRAT8 and STRA9, ENV6, ENV7, ENV8, ENV9 and ENV10.

Local Plan allocations that remove land from the Green Belt specifically noted that development would only be permitted where it would not have an unacceptable visual impact on the surrounding area, in particular protecting the RPG and its setting. **This application would have an unacceptable impact on the visual integrity of the countryside both within and in the setting of the RPG contrary to the Local Plan.** The Cultural Heritage chapter of the submitted ES identifies that the proposal would have a significant adverse impact on heritage assets.

Local Plan Policies for land on and around CSC (STRAT8 and STRAT9) specifically require the protection of the RPG and its setting. STRAT6 specifically seeks to preserve the application site as part of the Green Belt in order to secure protection of the RPG and surrounding valuable landscape. This proposal is in direct contradiction of these policies and results in harm to the designated heritage asset of Nuneham Courteny Registered Park and Garden. As such it is also contrary to Local Plan Heritage Policies ENV6 and ENV10 which specifically seek to protect the district's heritage assets.

As submitted, the proposal is contrary to local plan policy and the NPPF as it will result in harm to the significance of designated heritage assets. Specifically, any harm or loss of significance to Grade I registered parks and gardens should be wholly exceptional under the tests of paragraph 206 of the NPPF. Whilst the battery storage structures are not proposed within the designated area, the large compound facility results in a permanent industrial change to the character of the area. The development and proposed mitigating planting fails to respect the manner in which the park is experienced within its setting with proposed screening planting changing the character of the RPG, contrary to the historic landscape's character and relationship to the countryside.

This application is contrary to paragraphs 205 and 206 of the NPPF and Local Policies ENV6 and ENV10 due to harmful nature of proposed development and mitigating planting both within and in the setting of the Grade I Registered Park and Garden.

If you are minded to approve this application you must be certain that there are considerable public benefits to the proposal that significantly outweigh the identified harm to heritage assets.

From	**Samantha Allen BA(Hons) MSc IHBC**
Date	17 June 2024

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Application Reference : P24/S1498/FUL - 7

Please complete

Your name :	Ecology Team (South and Vale)
Your address :	South Oxfordshire & Vale of White Horse District Councils
Date :	04 June 2024

Use the space below for your comments

Holding objection. Further information required.

This application seeks full planning permission for the formation of a battery energy storage system (BESS), with associated infrastructure and landscaping.

The application is supported by an Environmental Statement, but ecology and biodiversity was scoped out EIA consideration consistent with the views presented under P22/S4551/SCO.

Notwithstanding this, an ecological impact assessment (EcIA) and biodiversity impact assessment (BIA), with the associated metric, have been submitted to support the planning application. The site has been subject to ecological surveys between 2022 and 2024.

Designated sites:

I am satisfied that the proposed development is unlikely to give rise to any impacts on statutory designed sites (SSSI, SAC). Further consideration under the HRA process is not required.

The application site mostly adjacent to, but partly within (for the purpose of connecting infrastructure to an existing electricity tower) Furze Brake Local Wildlife Site (LWS site code: 59I05). This LWS is designated for the species rich priority habitat woodland and the presence of a large heronry (c.50 nests).

Impacts on the LWS which would undermine the identified value of the site are unlikely to occur. The tree removal plan of the AIA does not show any loss of trees which form part of the LWS. Construction control measures, secured through a construction environmental management plan (CEMP) can ensure sensitive works in close proximity to important ecological receptors, such as the LWS.

Other locally designated sites, such as Radley Gravel Pits LWS (site code: 59I03), located to the north of the River Thames, are very unlikely to be adversely impacted.

Habitats:

None of the habitats on-site have been identified as a material constraint to development (priority habitat), and in this regard Policy ENV2 is not engaged with regards to habitats.

The development would primarily see the loss of modified grassland, bramble scrub and mixed scrub. These habitats have value, which is accounted for in the BNG metric assessment (discussed below). Notable habitat creation is proposed on-site to compensate for these losses.

Species:

The proposed development would result in the loss of an outlier (not a main) badger sett (s5). The loss of this sett would require a licence from Natural England to be lawful, but I am confident that such a licence would be granted. Badgers are protected species, and therefore the loss of the outlier sett would be a minor adverse impact that would need to be considered under the requirements of Policy ENV2. It is unlikely that the loss of the outlier sett would have a significant impact on the resident badger clan or the local population. Subject to fencing being made permeable to the species, the on-site habitat enhancements would likely create a greater foraging resource than currently exists.

Impacts on other species, subject to safeguards being secured (e.g. sensitive external lighting scheme, CEMP), are not considered to be likely.

Biodiversity net gain (BNG):

This planning application is subject to mandatory BNG, within the meaning of Schedule 7A of the TCPA 1990. Should planning permission be granted, that permission would be subject to the general biodiversity gain condition which requires discharging prior to commencement of development.

At this stage, when assessing the planning application, the following matters are being considered:

- Whether national minimum information requirements have been met;
- Whether the baseline habitats have been assessed accurately;
- Whether the supporting metric has accounted for those baseline habitats accurately;
- Whether the Biodiversity Gain Hierarchy has been followed (avoiding impacts on valuable habitats and maximising on-site gains);
- Whether any habitat creation (significant on-site, or any off-site) requires a planning obligation to secure for the statutory minimum of 30 years post-completion.

Detail related to the post-development habitats and ongoing management is secured under the discharge of condition stage, pursuant to the general biodiversity gain condition. As such, I do not recommend that the provided LEMP is approved as this likely replicates the requirements of the general biodiversity gain condition. A Biodiversity Gain Plan and supporting Habitat Management and Monitoring Plan (HMMP) will need to be submitted to discharge this condition, along with a completed metric.

Minimum information requirements:

The BNG section of the application form has been completed correctly, with confirmation that no irreplaceable habitats exist within the red line boundary and that no degradation has taken place. The application is supported with the statutory biodiversity metric with the baseline sections completed. A baseline habitat plan, consistent with the metric, has been provided in the EcIA.

I am satisfied that this information meets national minimum information standards.

Baseline habitats:

Habitat condition assessment sheets have not been provided to expand on the information provided in Table 4.2 of the EcIA. I recommend that these sheets (in excel format) are provided to give confidence in the condition assessment of each parcel. This is particularly relevant for the grassland compartments, where species density per square metre is a key determining factor in both habitat type (e.g. modified grassland vs other neutral grassland) and condition. Additional information (quadrats?) should be provided to support the condition sheet entries. An update visit may be required to obtain this information.

It also appears that individual trees within the area of bramble scrub have not been recorded as such, accorded to the AIA.

Metric:

The baseline sections of the supporting metric appear to be consistent with the habitat plan provided in the EcIA. Following review and provision of additional

condition sheet information (mentioned above), the type and condition of the entries within the metric may need to be amended.

Biodiversity Gain Hierarchy:

The Biodiversity Gain Hierarchy (within the meaning of Article 37D of the DMPO) requires that impacts to habitats identified as being of medium or higher distinctiveness within the metric should be protected from harm as much as possible. It also requires that opportunities for on-site enhancements are maximised.

Subject to review and potential amendment, the baseline habitat information identifies that areas of: other neutral grassland, bramble/blackthorn/mixed scrub, and individual rural trees have a distinctiveness of medium or higher, and are therefore subject to consideration under the Biodiversity Gain Hierarchy.

Bramble scrub this area of bramble scrub is contiguous with an existing substation, so I can understand the reason why it is appropriate to site the substation extension in this location. There is potential to relocate this to the north of the proposed compound, within an area of (currently assessed) low distinctiveness modified grassland, but this would could create issues in terms of cable routing and ease of maintenance. I would encourage the applicant/agent to explain by extending the substation in the southeast is preferable to having the compound elsewhere on-site.

Blackthorn scrub this habitat is located in the north of the site, away from development. Proposed planting plans show that woodland planting is to take place in this area. Loss plans show the habitat to be removed. I cannot see why the area of blackthorn scrub must be removed. It could be surrounded and eventually subsumed into the woodland planting. As such, I recommend that this area of habitat is retained and not lost.

Mixed scrub this habitat is adjacent to F6, within the centre of the site. It is shown as being lost to modified grassland. The proposed underground electric cable runs through part of this feature, but I cannot see why it must be removed in its entirety. I recommend that either the cable route is amended to skirt around this feature (following the road for c.80m more) or, if this is the only possible route for the cable, to limit loss to that which is absolutely necessary. I am not convinced that this loss (to modified grassland) is appropriate currently.

Other neutral grassland this habitat is spread across the site in parcels. Most is retained, some is lost to proposed woodland planting (generally supportable) and some is included in the area of the southeastern substation extension. The response to questions posed under bramble scrub above can be used to assess this loss.

Individual rural trees tree loss is minimal across the site. Answers to both the mixed and bramble scrub points above will inform whether the tree loss on those locations is justifiable.

Planning obligation:

It is apparent at this stage that the development intends to undertake significant on-site habitat creation as part of the proposed development. As such, these significant on-site habitat enhancements must be secured for the statutory minimum of 30 years. In accordance with the attached guidance, the ongoing management and maintenance of these habitats should be secured with a s106 planning obligation. The case officer is advised to instruct the Legal Team to prepare this. A financial contribution for BNG monitoring will be secured as part of this.

It is noted that the applicant wishes to explore the potential of selling excess on-site habitat gains on the BNG market. This is supportable in principle, but must be secured through a planning obligation. Furthermore, the excess (over and above what is required to deliver 10% BNG for this development) habitat gains must be spatially ring-fenced and then recorded on the statutory Biodiversity Gain Site Register.

Should the applicant wish to explore this, plans should be produced which spatially identify the habitats required to meet the minimum 10% BNG requirement for the development, and then spatially identify the excess habitats which could be recorded on the statutory register and units sold on the BNG market.

Summary:

Additional information is required prior to determination:

- Baseline habitat condition sheets (excel format) and supporting information
- Updated metric (potentially)
- Justification for the loss of medium distinctiveness habitats
- Additional plans for the purpose of using a planning obligation to secure on-site BNG for sale on the BNG market.

The following conditions are likely to be required, if planning permission is granted:

- Construction environmental management plan (CEMP)
- Biodiversity enhancement plan (BEP)
- External lighting details

The submitted landscape and ecology management plan (LEMP) should not be secured as the details (Biodiversity Gain Plan and HMMP) submitted to discharge the general biodiversity gain condition will serve this purpose.

Edward Church ACIEEM

BNG Guidance Note:

Securing 'Significant' On-Site Enhancements

This guidance note outlines the councils' approach to securing **'significant' on-site** biodiversity enhancements for developments where mandatory biodiversity net gain (BNG) applies.

-

Background

The Environment Act 2021 and associated regulations amend the Town and Country Planning Act 1990 (TCPA) to make BNG a mandatory condition of planning permission. Major TCPA development has been subject to mandatory BNG since 12 February 2024, and all other TCPA development has been subject to BNG from 2 April onwards (subject to exemptions).

Relevant developments need to demonstrate that proposals can deliver a minimum 10% uplift in biodiversity value, when compared to the pre-development biodiversity value of the application site. Uplift is calculated using the statutory biodiversity metric. Development cannot commence until BNG has been demonstrated.

To achieve this, developers will need to submit a biodiversity gain plan (BGP) to the local planning authority for approval, after the grant of planning permission. The BGP is a document which details what measures are being provided to achieve the required uplift in biodiversity value. On-site and off-site measures can be included in the BGP, with the purchase of statutory credits as a last resort.

-

'Significant' On-Site Enhancements (SOEs)

In accordance with the Biodiversity Gain Hierarchy[1], when agreeing measures needed to meet the mandatory minimum 10% biodiversity uplift, the local planning authority is obliged to encourage the creation and enhancement of on-site habitats first before accepting any off-site measures.

"On-site"

Land to which the planning application is related[2]. In practice, this means all land within the red line boundary of the planning application.

[1] Section 7A of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended).

[2] Paragraph 12(1) of Schedule 7A of the Town and Country Planning Act 1990 (as amended).

The requirements of the Biodiversity Gain Hierarchy mean that developers will be asked to maximise biodiversity gains within the red line boundary of their planning application. This will likely result in development proposals incorporating habitats of increased ecological value in landscaped areas; such as species-rich grassland, wetland features, and tree or woodland planting.

Legislation requires that, where a development would deliver on-site habitat enhancements that are 'significant', local planning authorities **must** secure the successful establishment and ongoing maintenance of those SOEs for at least 30 years after the development is completed[3]. The long-term maintenance of SOEs can be secured by the local planning authority through planning conditions or legal agreements, as appropriate.

"Significant"

Habitats which make an important contribution to the post-development biodiversity value of a development. Guidance suggests that this may include:

- *habitats of medium or higher distinctiveness in the biodiversity metric*
- *habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development (e.g. >25% of total units)*
- *habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development*
- *areas of habitat creation or enhancement which are significant in area relative to the size of the development (e.g. >25% of site area)*
- *enhancements to habitat condition, for example from poor or moderate to good*

Private gardens, ornamental planting, road verges and small areas of amenity grassland are unlikely to be considered 'significant'. Local planning authorities are not obliged to secure the long-term management of these features for the purpose of mandatory BNG, but these areas (excluding private gardens) will likely still have long-term management secured through other mechanisms.

-

[3] Paragraph 9 of Schedule 7A of the Town and Country Planning Act 1990 (as amended).

BNG Monitoring and Planning Obligations

Local planning authorities have a statutory obligation to monitor and report on the success of measures used to implement mandatory BNG[4]. This includes securing SOEs when exercising planning functions.

In securing SOEs, for a minimum of 30 years, the councils will incur costs through monitoring and reporting on those enhancements. To ensure that the councils can fulfil their statutory obligations, over the long-term, it is essential that these costs are recovered.

The councils will use planning obligations, under section 106 of the TCPA ("section 106 agreements"), to secure the establishment and long-term maintenance of SOEs. These planning obligations will also require developers to make financial contributions to the council to recover the costs of monitoring over the length of the agreement. It is appropriate and standard practice for the councils to recover the costs of monitoring the delivery of measures secured through planning obligations[5]. The councils' general statement supporting planning obligation monitoring can be found here.

To minimise burdens and reduce delays on developers, standardised templates for SOE planning obligations will be used wherever possible and appropriate.

Planning conditions will not be used to secure SOEs. There is no appropriate mechanism to facilitate cost recovery associated with long-term monitoring and reporting on planning conditions over the 30 year period, as is required by mandatory BNG legislation.

-

Costs

When securing SOEs through planning obligations, developers will be required to pay the council two sets of fees: legal fees (on instruction of the Legal Department) and the BNG monitoring fee (on commencement of the development).

Legal Fees:

Initial council legal fees, payable when a planning obligation is being drafted and reviewed, can cost applicants between £3,355-£5,600, depending on the complexity of the agreement. Where actual legal costs exceed the initial fee, payment of additional costs are payable at completion of the agreement. These fees are set by the Legal Department and are reviewed annually.

[4] Section 40A(4) of the Natural Environment and Rural Communities Act 2006 (as amended).
[5] Regulation 122(2A) of The Community Infrastructure Levy Regulations 2010 (as amended).

BNG Monitoring Fee:

The BNG monitoring fee is determined by the cost schedule below, with an explanation provided in Appendix 1. The BNG monitoring fee is reviewed annually.

Monitoring Type	**BNG Monitoring Fee**
Single Feature *(small areas or lengths of a single type of habitat feature that requires monitoring)*	£946.56
Minor Development *(up to 9 dwellings, or up to 999m^2 floorspace, or site area <1ha)*	£3,786.23
Major Development *(between 10 and 199 dwellings, or between 1,000m^2 and 9,999m^2 floorspace, or site area ≥1ha but <2ha)*	£7,572.46
Large Major Development *(200+ dwellings, or 10,000m^2+ floorspace, or site area ≥2ha)*	£15,144.92

Where the council considers it justified (e.g. very complex or large parcels of SOEs), a bespoke approach to calculating the BNG monitoring fee will be taken.

In instances where a single development is providing both SOEs and 'registered off-site biodiversity gain' (ROBG)[6], a combined planning obligation and single BNG monitoring fee may be appropriate. Such instances will be assessed on a case-by-case basis and only agreed where the likely cost of combined monitoring would not exceed the BNG monitoring fee contribution (dependent on size, complexity and geographical location of the SOEs and ROBG).

-

[6] See council BNG Guidance Note: Securing Off-Site Enhancements

Appendix 1: BNG Monitoring Fee

SOE planning obligations will require developers, or whichever subsequent body or organisation that takes on that legal responsibility, to provide the councils with BNG monitoring reports at intervals throughout the length of the agreement. These BNG monitoring reports will be produced by a suitably qualified ecologist, independent of both the councils and the developer, who has surveyed relevant land. The BNG monitoring report will provide detail on the success of SOEs (e.g. condition of habitats) compared to the Biodiversity Gain Plan, approved for the development pursuant to the requirements of mandatory BNG[7].

-

How the Monitoring Fee is Calculated

1. Hourly Rate

The review and assessment of BNG monitoring reports, plus associated visits to areas of SOEs, must be undertaken by a suitably qualified and experienced ecological professional. The councils' Senior Ecology Officer is the appropriate officer to undertake the review of BNG monitoring reports. Referring to the Planning Department's bespoke fees/costs calculator, the Senior Ecology Officer has an hourly rate of **£74.63**. This hourly rate is reviewed annually.

2. Frequency of Monitoring Intervals

Each SOE planning obligation will include a minimum of eight monitoring intervals throughout the length of the agreement. These typically will take place at years 1, 2, 5, 10, 15, 20, 25, and 30. Planning obligations of differing lengths may require more or fewer monitoring intervals, or monitoring on different years. This will be assessed on a case-by-case basis.

3. Time per Monitoring Interval

Monitoring intervals are likely to require the councils to engage in: general administration, review of monitoring reports, site visits, and statutory data collection/reporting. The length of time spent per monitoring event will depend on the scale and complexity of SOEs, linked to the scale and complexity of the development. Four scenarios are accounted for below, with an estimation for review time taken per monitoring interval.

[7] Section 13 of Schedule 7A of the Town and Country Planning Act 1990 (as amended).

Monitoring Type	Time per Monitoring Interval
Single Feature	1 hour
Minor Development	4 hours
Major Development	8 hours
Large Major Development	16 hours

4. Inflation

SOE planning obligations are required to secure created/enhanced habitats for a minimum of 30 years (after the completion of development works – including landscaping). It is necessary for the council to ensure that the BNG monitoring fee will cover the costs of monitoring intervals in the future. The BNG monitoring fee, which will cover the entire length of the agreement, is secured at the point that planning permission is granted. This requires assumptions to be made as to the future level of inflation. The BNG monitoring fee will be reviewed annually, with the Retail Price Index (RPI) for April of that year (taken from the Office of National Statistics) assumed for each successive year of the planning obligation. The RPI for April 2024 is **3.3%**. This will be assumed until next review.

5. Cost Schedule

Taking the above hourly rate, frequency of monitoring intervals, time required per monitoring interval and inflationary allowance, the below cost schedule is produced for the three type classes of development. The total BNG monitoring calculation is shown on the next page, with the final fee being the sum of the cost of monitoring intervals (shaded rows).

		BNG Monitoring Type			
	Year	**Single Feature**	**Minor Development**	**Major Development**	**Large Major Development**
Monitor →	1	£74.63	£298.52	£597.04	£1,194.08
Monitor →	2	£77.09	£308.37	£616.74	£1,233.48
	3	£79.64	£318.55	£637.09	£1,274.19
	4	£82.26	£329.06	£658.12	£1,316.24
Monitor →	5	£84.98	£339.92	£679.84	£1,359.67
	6	£87.78	£351.14	£702.27	£1,404.54
	7	£90.68	£362.72	£725.45	£1,450.89
	8	£93.67	£374.69	£749.39	£1,498.77
	9	£96.76	£387.06	£774.12	£1,548.23
Monitor →	10	£99.96	£399.83	£799.66	£1,599.32
	11	£103.26	£413.03	£826.05	£1,652.10
	12	£106.66	£426.66	£853.31	£1,706.62
	13	£110.18	£440.73	£881.47	£1,762.94
	14	£113.82	£455.28	£910.56	£1,821.12
Monitor →	15	£117.58	£470.30	£940.61	£1,881.21
	16	£121.46	£485.82	£971.65	£1,943.29
	17	£125.46	£501.86	£1,003.71	£2,007.42
	18	£129.60	£518.42	£1,036.83	£2,073.67
	19	£133.88	£535.52	£1,071.05	£2,142.10
Monitor →	20	£138.30	£553.20	£1,106.39	£2,212.79
	21	£142.86	£571.45	£1,142.90	£2,285.81
	22	£147.58	£590.31	£1,180.62	£2,361.24
	23	£152.45	£609.79	£1,219.58	£2,439.16
	24	£157.48	£629.91	£1,259.83	£2,519.65
Monitor →	25	£162.68	£650.70	£1,301.40	£2,602.80
	26	£168.04	£672.17	£1,344.35	£2,688.69
	27	£173.59	£694.36	£1,388.71	£2,777.42
	28	£179.32	£717.27	£1,434.54	£2,869.08
	29	£185.23	£740.94	£1,481.88	£2,963.76
Monitor →	30	£191.35	£765.39	£1,530.78	£3,061.56
	Total:	**£946.56**	**£3,786.23**	**£7,572.46**	**£15,144.92**

[Development and Corporate Landlord]
HEAD OF SERVICE: **[ANDREW BUSBY]**

South Oxfordshire District Council
Listening Learning Leading
Vale of White Horse District Council

CONTACT OFFICER: David Bell

Abbey House, Abbey Close, Abingdon,
OXON, OX14 3JE

B Duffy
Abbey House
Abbey Close
Abingdon
Oxon
OX14 3JE

Dear Ben

P24 S1498 FUL – Flood Risk and Drainage

The following information has been reviewed:

Flood Risk Assessment

Recommendation: Holding Objection

Flood Risk

In general the Flood Risk Assessment confirms that the proposed scheme is at low risk of flooding from fluvial and surface water sources. Detailed site investigation indicates that groundwater was identified at 3.18m and 4.95m below ground level and that strata is of sands and gravels. We would have no particular concerns in relation to flood risk.

Drainage Strategy

The drainage strategy rules out infiltration given concerns around pollution should firewater runoff become contaminated during the unlikely event of a fire. The strategy presented is therefore attenuation-based with storage in gravel compound blankets and an outfall to a watercourse.

The strategy references a series of swales or interception channels down gradient of the battery storage units with a storage capacity of 250m3. This should be clearly shown on the drainage strategy drawing.

The outfall to a watercourse appears to be located on the opposite side of the railway to the site. Further detail is needed on this to include levels, means and agreement to install a connection under the railway and confirmation that the applicant has rights to connect surface water to this watercourse. As this is shown to be outside of the site boundary, confirmation of connection rights and ability to make this connection are required before drainage conditions can be considered.

I trust the above is of assistance, if you have any queries, please do not hesitate to contact me.

Yours sincerely

David Bell
Senior Flood Risk Engineer
Vale of White Horse District Council

APPLICATION WEB COMMENTS FORM

Information available for public inspection and available on our website

Location : Land to the north of the Culham Science Centre Thame Lane near Clifton Hampden OX14 3GY
Proposal : 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.(A hard copy of the Environmental Statement can be viewed at South Oxfordshire District Council, Abbey House Abbey Close Abingdon OX14 3JE).REPRESENTATIONS IN WRITING BY 28 JUNE 2024
Application Reference : P24/S1498/FUL - 10

Please complete

Your name :	Forestry Officer (South and Vale)
Your address :	SODC & VOWH
Date :	30 May 2024

Use the space below for your comments

In principle I have no objections to the development in respect of trees. It seeks to remove very few trees to facilitate a major development of key local importance and offers a significant increase in tree planting by way of mitigation and improvement in line with Policies ENV1, DES1, and DES2 of the South Oxfordshire Local Plan 2035 and the Council's Joint Design Guide 2022, promoting the integration of the proposals within the context and character of the landscape.

However, there are some apparent discrepancies within the Arboricultural submissions as follows:

The list of trees affected or removed in the AIA excludes G12, T8, T48, T49, T50, T51 & T52. But these trees are then shown as having a new below ground electrical supply laid through their RPA including a change of direction within the RPA likely requiring an open trench methodology.

This conflict should be resolved by moving the new cables south into the road and outside of the RPA of the trees before turning North as needed once past the group. At the very least the route should be kept outside of the RPA of the Cat B T8 & T48-T52.

Additionally, it isn't abundantly clear why the proposals seek the removal of T17 & T18 English Oak and this should be better evidenced.

Lastly, I found no mention of methodology surrounding the installation of new fencing within the RPA of retained trees. As there appear to be great lengths of fencing required all of which, independent of design, require concrete footings, this should be provided for as a note within the Tree Protection Plan stating that all fence post footings will be dug by hand and sleeved to prevent the egress of leachates within the RPA of retained trees.

These alterations and subsequent resubmission should be sought prior to determination rather than via condition.

Ben Morgan (Area Tree Officer).

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Application Reference : P24/S1498/FUL - 10

Please complete

Your name :	Forestry Officer (South and Vale)
Your address :	SODC & VOWH
Date :	29 May 2024

Use the space below for your comments

In principle I have no objections to the development in respect of trees. It seeks to remove very few trees to facilitate a major development of key local importance and offers a significant increase in tree planting by way of mitigation and improvement in line with Policies ENV1, DES1, and DES2 of the South Oxfordshire Local Plan 2035 and the Council's Joint Design Guide 2022, promoting the integration of the proposals within the context and character of the landscape.

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Ben Morgan (Area Tree Officer).

RE: [EXT] Planning Consultation - P24/S1498/FUL - CLI

.box.plantprotection <plantprotection@cadentgas.com>

Mon 20/05/2024 10:13

To:Planning Registration <registration@southandvale.gov.uk>

****EXTERNAL****

Thank you for your email.

This application falls outside of Cadent's distribution network.

Please contact National Grid and/or your local Gas distributor for comments on this application.

National Grid

Please submit your application via LSBUD or contact assetprotection@nationalgrid.com

Gas Distribution Networks

SGN
Wales and West Utilities (WWU)
Northern Gas Networks (NGN)

Kind Regards,
Plant Protection
Customer Performance

Cadent
Block 1, Floor 1, Brick Kiln Street, Hinckley LE10 0NA
T 0800 688 588
plantprotection@cadentgas.com
cadentgas.com

Self Service for Plant Enquiries:

www.lsbud.co.uk

Please note – We've moved

We have now moved our Dial Before U Dig enquiry platform from EAGLES to LinesearchbeforeUdig. All Cadent and National Grid plant enquiries will need to be logged via the online portal for instant assessment. Why not register now?

From: registration@southandvale.gov.uk <registration@southandvale.gov.uk>
Sent: Friday, May 17, 2024 10:17 PM
To: .box.plantprotection <plantprotection@cadentgas.com>
Subject: [EXT] Planning Consultation - P24/S1498/FUL - CLI

An amendment relating to application number P24/S1498/FUL has been deposited with the District Council as Local Planning Authority.

The consultation document is attached below.

Alternatively, you can submit your comments regarding this application online by clicking this link.

Full details of this application can be found on our website here.

Automatic reply: [EXT] Planning Consultation - P24/S1498/FUL - CLI

.box.plantprotection <plantprotection@cadentgas.com>

Fri 17/05/2024 22:17

To:Planning Registration <registration@southandvale.gov.uk>

****EXTERNAL****

Thank you for your email.

If you're contacting us because **you want to dig**, you will need to register with LinesearchbeforeUdig to process any new enquiries.

Please use the following link to log your request - **WWW.LSBUD.CO.UK**

You will need the following information to submit an enquiry –

- Full site address including postcode
- Full description of works you are planning on undertaking
- Your works start date
- Any relevant site contact details

A site plan highlighting the extent of works will need to be provided following the request from the relevant network.

Please ensure that you include all relevant information regarding your works on your request to enable us to make an accurate assessment.

Please do not commence with any works until you have received authorisation and guidance.

If you need assistance and want to speak to one of the team, you can call us on 0800 688 588 between 8am and 4:30pm Monday to Friday.

Kind Regards,

Dial Before you Dig and Plant Protection Team

If you've hit a pipeline (even if no gas is leaking) call the National Gas Emergency Service 24 hours a day on 0800 111 999 (calls are recorded and may be monitored).

Application no: P24/S1498/FUL
Location: Land to the north of the Culham Science Centre Thame Lane OX14 3GY

Archaeology

Recommendation:

Objection for the following reason/s:

Comments:

The results of an archaeological trenched evaluation, will need to be submitted in line with the National Planning Policy Framework (2023), paragraph 200, prior to the determination of this planning application.

We have previously provided archaeological advice on this site in a pre-application response (E0700179/2022/031212) in July 2022 where we advised that an archaeological desk-based assessment and the results of an archaeological evaluation would need to be submitted with any planning application for the site. We have also provided advice on the scope of the Environmental Impact Assessment (EIA) as part of the formal scoping opinion sought by the applicant (P22/S4551/SCO) in January 2023 where we further reiterated that a programme of archaeological trenched evaluation would need to be undertaken.

We previously noted in our scoping comments that the results of a desk-based assessment and geophysical survey alone would not provide for a sufficient and suitably informed assessment of the potential archaeological resource within the site, an understanding as to its significance, and the likely effects of proposed development on that significance. These comments are acknowledged in the Consultations table of Chapter 3: Cultural Heritage of the submitted Environmental Statement (ES).

Throughout Chapter 3 of the submitted ES it is stated that a trenched evaluation is to be conducted, this required to appropriately inform the archaeology baseline (paragraph 3.8) and reduce existing limitations on assessing and understanding the effects of proposed development on the below ground archaeological resource (paragraph 3.30). A proposed Written Scheme of Investigation (WSI) for undertaking trenched evaluation is also provided at Annexe 4, Appendix Cultural Heritage of Volume 3 of the submitted ES. This submitted WSI itself acknowledges at paragraph 1.1.2 that the trenched evaluation is to be undertaken to inform the Planning Authority in support of submission of a planning application.

As set out by our previous comments to this application, the results of an archaeological trenched evaluation will therefore need to be undertaken on the site, and the agreed results submitted prior to the determination of this application.

The archaeological field evaluation must be undertaken in line with the Chartered Institute for Archaeologists standards and guidance including the submission and agreement of a suitable WSI. Whilst we acknowledge the submission of a proposed outline WSI provided at Annexe 4, Appendix Cultural Heritage of Volume 3 of the submitted ES, there are a number of issues with this WSI that will require amendment before we could agree that it is acceptable.

An appropriately amended WSI for the required archaeological trenched evaluation works will therefore need to be submitted and agreed.

Officer's Name: County Archaeological Services
Officer's Title: Archaeologist
Date: 31/5/2024

OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO CONSULTATION ON THE FOLLOWING DEVELOPMENT PROPOSAL

District: South Oxfordshire
Application no: P24/S1498/FUL
Proposal: 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.
Location: Land to the north of the Culham Science Centre Thame Lane OX14 3GY

Response Date: 17th June 2024

This report sets out the officer views of Oxfordshire County Council (OCC) on the above proposal. These are set out by individual service area/technical discipline and include details of any planning conditions or Informatives that should be attached in the event that permission is granted and any obligations to be secured by way of a S106 agreement. Where considered appropriate, an overarching strategic commentary is also included. If the local County Council member has provided comments on the application these are provided as a separate attachment.

Application no: P24/S1498/FUL
Location: Land to the north of the Culham Science Centre Thame Lane OX14 3GY

General Information and Advice

Recommendations for approval contrary to OCC objection:
If within this response an OCC officer has raised an objection but the Local Planning Authority are still minded to recommend approval, OCC would be grateful for notification (via planningconsultations@oxfordshire.gov.uk) as to why material consideration outweigh OCC's objections, and to be given an opportunity to make further representations.

Outline applications and contributions
The anticipated number and type of dwellings and/or the floor space may be set by the developer at the time of application which is used to assess necessary mitigation. If not stated in the application, a policy compliant mix will be used. The number and type of dwellings used when assessing S106 planning obligations is set out on the first page of this response.

In the case of outline applications, once the unit mix/floor space is confirmed by reserved matters approval/discharge of condition a matrix (if appropriate) will be applied to establish any increase in contributions payable. A further increase in contributions may result if there is a reserved matters approval changing the unit mix/floor space.

Where a S106/Planning Obligation is required:

- **Index Linked** – in order to maintain the real value of S106 contributions, contributions will be index linked. Base values and the index to be applied are set out in the Schedules to this response.

- **Administration and Monitoring Fee - TBC**
  This is an estimate of the amount required to cover the monitoring and administration associated with the S106 agreement. The final amount will be based on the OCC's scale of fees and will adjusted to take account of the number of obligations and the complexity of the S106 agreement.

- **OCC Legal Fees** The applicant will be required to pay OCC's legal fees in relation to legal agreements. Please note the fees apply whether a S106 agreement is completed or not.

Security of payment for deferred contributions - Applicants should be aware that an approved bond will be required to secure a payment where a S106 contribution is to be paid post implementation and

- the contribution amounts to 25% or more (including anticipated indexation) of the cost of the project it is towards and that project cost £7.5m or more

- the developer is direct delivering an item of infrastructure costing £7.5m or more
- where aggregate contributions towards bus services exceeds £1m (including anticipated indexation).

A bond will also be required where a developer is direct delivering an item of infrastructure.

The County Infrastructure Funding Team can provide the full policy and advice, on request.

Application no: P24/S1498/FUL
Location: Land to the north of the Culham Science Centre Thame Lane OX14 3GY

Transport Schedule

Recommendation:

Objection - However, if the Applicant submits further clarifying information/details, then the Highway Authority will be able to consider further.

Key Issues

- The applicant is required to provide justification for the proposed 14 parking spaces.

Conditions

PLC:3502 Wheel washing facilities: Wheel washing facilities shall be established within the site in accordance with details to be submitted to and approved in writing by the Local Planning Authority prior to the commencement of development. Such facilities shall be established prior to the commencement of demolition or construction and shall be kept in operation at all times during demolition and construction works. Reason: To prevent the tracking out of materials onto the highway in the interests of highway safety in accordance with Policy TRANS5 of the South Oxfordshire Local Plan 2035.

PLC:3503 Construction Traffic Management. The submitted Construction Traffic Management Plan (CTMP) shall be implemented prior to any works being carried out on site and shall be maintained throughout the course of the development. Reason: In the interests of highway safety and to mitigate the impact of construction vehicles on the surrounding highway network, road infrastructure and local residents, particularly at morning and afternoon peak traffic times and in accordance with Policy TRANS5 of the South Oxfordshire Local Plan 2035.

Detailed Comments:

Development Proposals

1. I understand this application is for 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 OX14 3GY.

2. The site comprises areas of open fields and is crossed by a tarmac track (Thame Lane, a non-public highway) as well as an existing farm track.

Site Access

3. The site is currently accessed by the Thame Lane, which connects to Abingdon Road to the south.

4. The applicant proposes access to the site for construction vehicles from A415 Abingdon Road to the south use the eastern junction with Station Road. and along a private road which runs to the east of Culham No.1 Industrial Estate.

5. Following construction of the battery storage, the applicant proposes operational site access from A415 Abingdon Road to the south use the eastern junction with Station Road. and along a private road which runs through Culham No.1 Industrial Estate.

6. Visibility splays, in line with the posted speed limit, can be achieved from the Station Road access onto A415 Abingdon Road.

Trip Generation and Highway Impact

7. The applicant has confirmed in the Planning, Design and Access Statement (para 8.24) that once installed, the development will be unmanned and will generate very minimal extra traffic movements. The impact of the proposed development, during the operational phase, will therefore be minimal. They will therefore be no or very little impact on the local highway network.

8. During the construction phase is development is expected to generate circa 50 Heavy Duty Vehicles (HDVs) however the applicant states that this is the peak and will be confined to the early earthworks / civils phase of the project.

Car Parking

9. The applicant states that during the operational phase a total of 14 car parking spaces will be provide (para 8.25 of the Planning, Design and Access Statement). That design the planning design access statement para 8.24 states that the proposed developments when operational will generate 'very minimal extra traffic movements'. <u>The applicant is therefore required to provide justification for the proposed 14 parking spaces.</u>

Construction Traffic Management Plan

10. The applicant has submitted a Construction Traffic Management Plan (CTMP).

11. The CTMP states (para 2.9) that deliveries and collections by HGVs will be restricted to weekdays only and between 09:30 and 16:00 (outside of school term) and between 09:30 and 15:00 (during school term).

12. The CTMP also states (para 2.8) that a temporary car parking area (including spaces for minibuses and vans) will be provided within the on-site contractor's compound.

13. The submitted CTMP is acceptable to the County.

Officer's Name: Judith Goodwin
Officer's Title: Senior Transport Development Officer
Date: 04/06/2024

Application no: P24/S1498/FUL
Location: Land to the north of the Culham Science Centre Thame Lane OX14 3GY

Lead Local Flood Authority

Recommendation:

Comments

Detailed comments:

The FRA is consistent with the LLFA's requirements. Nothing further is required.

Officer's Name: Diane Rotherham
Officer's Title: Flood Risk Engineer
Date: 15/06/2024

Application no: P24/S1498/FUL
Location: Land to the north of the Culham Science Centre Thame Lane OX14 3GY

Archaeology

Recommendation:

Objection for the following reason/s:

Comments:

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An appropriately amended WSI for the required archaeological trenched evaluation works will therefore need to be submitted and agreed.

Officer's Name: County Archaeological Services
Officer's Title: Archaeologist
Date: 31/05/2024

RE: Consultation email for P24/S1498/FUL, Land to the north of the Culham Science Centre Thame Lane OX14 3GY

MacKay, Sarah - Oxfordshire County Council [redacted]

Tue 28/05/2024 20:33

To:Planning Registration <registration@southandvale.gov.uk>

****EXTERNAL****

Good Afternoon

From reviewing our comments are :

From reviewing the proposal details it is advised where required, works will be subject to a Building Regulations application and subsequent statutory consultation with the fire service, to ensure compliance with the functional requirements of The Building Regulations.

In addition it is advised that once the site is completed, the Responsible Person makes contact with Oxfordshire Fire and Rescue Service so that site specific risk information can be gathered.

Kind Regards
Sarah

Sarah Mackay
Building Control Liaison Manager & Fire Safety Inspector
Operational Communications Tactical Advisor
Oxfordshire County Council Fire and Rescue Service
[redacted]
www.oxfordshire.gov.uk

[redacted]

RE: [EXT] Planning Consultation - P24/S1498/FUL - CLI

.box.plantprotection <plantprotection@cadentgas.com>

Wed 15/05/2024 10:00

To:Planning Registration <registration@southandvale.gov.uk>

****EXTERNAL****

Thank you for your email.

This application falls outside of Cadent's distribution network.

Please contact National Grid and/or your local Gas distributor for comments on this application.

National Grid

Please submit your application via LSBUD or contact assetprotection@nationalgrid.com

Gas Distribution Networks

SGN
Wales and West Utilities (WWU)
Northern Gas Networks (NGN)

Kind Regards,
Plant Protection
Customer Performance

Cadent
Block 1, Floor 1, Brick Kiln Street, Hinckley LE10 0NA
T 0800 688 588
plantprotection@cadentgas.com
cadentgas.com

Self Service for Plant Enquiries:

www.lsbud.co.uk

Please note – We've moved

We have now moved our Dial Before U Dig enquiry platform from EAGLES to LinesearchbeforeUdig. All Cadent and National Grid plant enquiries will need to be logged via the online portal for instant assessment. Why not register now?

From: registration@southandvale.gov.uk <registration@southandvale.gov.uk>
Sent: Tuesday, May 14, 2024 12:47 PM
To: .box.plantprotection <plantprotection@cadentgas.com>
Subject: [EXT] Planning Consultation - P24/S1498/FUL - CLI

Application number P24/S1498/FUL has been deposited with the District Council as Local Planning Authority.

The consultation document is attached below.

Alternatively, you can submit your comments regarding this application online by clicking this link.

Full details of this application can be found on our website here.

APPLICATION WEB COMMENTS FORM

Information available for public inspection and available on our website

Location : Land to the north of the Culham Science Centre Thame Lane near Clifton Hampden OX14 3GY
Proposal : 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.(A hard copy of the Environmental Statement can be viewed at South Oxfordshire District Council, Abbey House Abbey Close Abingdon OX14 3JE).REPRESENTATIONS IN WRITING BY 28 JUNE 2024
Application Reference : P24/S1498/FUL - 15

Please complete

Your name :	Designing Out Crime Officer
Your address :	Thames Valley Police Oxford Road Kidlington OX5 2NX
Date :	21 May 2024

Use the space below for your comments

Thank you for consulting me on the above planning application. I have reviewed the submitted documents and crime statistics for the local area, and consulted with colleagues in CT policing. Details regarding security and perimeter fencing have been provided which are satisfactory. In addition, whilst connected to the National Grid, this development will not be classed as Critical national infrastructure. As such, I do not object to this application and have no comments to make.

From: Active Travel England Planning <planning-consultations@activetravelengland.gov.uk>
Sent: Wednesday, May 22, 2024 8:41 AM
To: Planning South <planning@southoxon.gov.uk>
Subject: LPA Reference: P24/S1498/FUL No Comment Response

****EXTERNAL****

LPA Reference: P24/S1498/FUL

ATE Reference: ATE/24/00588/FULL

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

Proposal: 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.

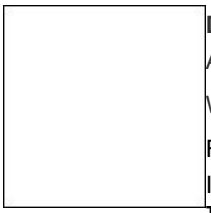
No comment

Dear Sir/Madam,

Thank you for your email

In relation to the above planning consultation and on the basis of the information available, Active Travel England is content with the development proposed.

Regards,



Development Management Team
Active Travel England
West Offices Station Rise, York, YO1 6GA
Follow us on Twitter **@activetraveleng**
Instagram **@activetravelengland** and on **LinkedIn**
]]>

[ref:a0zTw000000BMejIAG;18ca66cc4ff4576efff38c8ce1f8c1f4:ref]

FW: LPA Reference: P24/S1498/FUL No Comment Response

Planning South <planning@southoxon.gov.uk>

Fri 17/05/2024 10:43

To:Planning Registration <registration@southandvale.gov.uk>

[redacted]

From: Active Travel England Planning <planning-consultations@activetravelengland.gov.uk>
Sent: Thursday, May 16, 2024 11:57 AM
To: Planning South <planning@southoxon.gov.uk>
Subject: LPA Reference: P24/S1498/FUL No Comment Response

****EXTERNAL****

LPA Reference: P24/S1498/FUL

ATE Reference: ATE/24/00588/FULL

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

Proposal: 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.

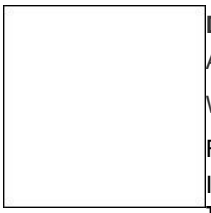
No comment

Dear Sir/Madam,

Thank you for your email

In relation to the above planning consultation and on the basis of the information available, Active Travel England is content with the development proposed.

Regards,



Development Management Team
Active Travel England
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Follow us on Twitter **@activetraveleng**
Instagram **@activetravelengland** and on **LinkedIn**
]]>

[ref:a0zTw000000BMejIAG;0d4995ebce4f32c991e0873a5d4af9ec:ref]

APPLICATION WEB COMMENTS FORM

Information available for public inspection and available on our website

Location : Land to the north of the Culham Science Centre Thame Lane near Clifton Hampden OX14 3GY
Proposal : 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.(A hard copy of the Environmental Statement can be viewed at South Oxfordshire District Council, Abbey House Abbey Close Abingdon OX14 3JE).REPRESENTATIONS IN WRITING BY 28 JUNE 2024
Application Reference : P24/S1498/FUL - 33

Please complete

Your name :	Env. Protection Team
Your address :	South Oxfordshire & Vale of White Horse District Council
Date :	19 June 2024

Use the space below for your comments

Date: 19.06.2024
Ref: P24/S1498/FUL-33

Development Description:
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.(A hard copy of the Environmental Statement can be viewed at South Oxfordshire District Council, Abbey House Abbey Close Abingdon OX14 3JE).REPRESENTATIONS IN WRITING BY 22 JUNE 2024

At: Land to the north of the Culham Science Centre, Thame Lane, near Clifton Hampden

Environmental Protection Planning Consultation
Thank you for consulting the Environmental Protection Team regarding the above application identified as P24/S1498/FUL. Having reviewed the submitted planning application and supporting documentation, I have no objections to the proposed development.
Please note that matters relating to Air Quality or Contaminated Land which

may be pertinent to this application will be reviewed by other Officers within the Environmental Protection Team. Any observations and comments by these Officers will be provided via separate consultation.

Environmental Protection Team

APPLICATION WEB COMMENTS FORM

Information available for public inspection and available on our website

Location : Land to the north of the Culham Science Centre Thame Lane near Clifton Hampden OX14 3GY
Proposal : 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.(A hard copy of the Environmental Statement can be viewed at South Oxfordshire District Council, Abbey House Abbey Close Abingdon OX14 3JE).REPRESENTATIONS IN WRITING BY 28 JUNE 2024
Application Reference : P24/S1498/FUL - 34

Please complete

Your name :	Contaminated Land
Your address :	(South Oxfordshire & Vale of White Horse District Councils)
Date :	31 May 2024

Use the space below for your comments

Development Description: 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

Planning Application Reference: P24/S1498/FUL

Thank you for consulting the Environmental Protection Service regarding this application.

I have reviewed the application from a contaminated land perspective and have no observations.

Colleagues will respond separately with any air quality or general environmental protection observations, where requested.

Regards

Environmental Protection Team

APPLICATION WEB COMMENTS FORM

Information available for public inspection and available on our website

Location : Land to the north of the Culham Science Centre Thame Lane near Clifton Hampden OX14 3GY
Proposal : 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.(A hard copy of the Environmental Statement can be viewed at South Oxfordshire District Council, Abbey House Abbey Close Abingdon OX14 3JE).REPRESENTATIONS IN WRITING BY 28 JUNE 2024
Application Reference : P24/S1498/FUL - 34

Please complete

Your name :	Contaminated Land
Your address :	(South Oxfordshire & Vale of White Horse District Councils)
Date :	31 May 2024

Use the space below for your comments

Development Description: 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

Planning Application Reference: P24/S1498/FUL

Thank you for consulting the Environmental Protection Service regarding this application.

I have reviewed the application from a contaminated land perspective and have no observations.

Colleagues will respond separately with any air quality or general environmental protection observations, where requested.

Regards

Environmental Protection Team

APPLICATION WEB COMMENTS FORM

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Proposal : 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.(A hard copy of the Environmental Statement can be viewed at South Oxfordshire District Council, Abbey House Abbey Close Abingdon OX14 3JE).REPRESENTATIONS IN WRITING BY 28 JUNE 2024
Application Reference : P24/S1498/FUL - 35

Please complete

Your name :	Landscape Architect (South and Vale)
Your address :	SODC & VOWH
Date :	10 June 2024

Use the space below for your comments

Please see attached

Vale of White Horse District Council

South Oxfordshire District Council

Listening Learning Leading

LANDSCAPE COMMENTS

TO:	Ben Duffy				
FROM:	Hazel Osborne				
DATE:	10 June 2024	**REF:**	P24/S1498/FUL		
SUBJECT:	Land to the north of the Culham Science Centre Thame Lane near Clifton Hampden OX14 3GY				
PROPOSAL:	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.(A hard copy of the Environmental Statement can be viewed at South Oxfordshire District Council, Abbey House Abbey Close Abingdon OX14 3JE)				

Relevant legislation, guidance, policies and SPDs:

- South Oxfordshire Local Plan 2035: STRAT 6, STRAT 8, STRAT 9, ENV 1, ENV 5, ENV12, DES 1, DES 2.
- South and Vale Joint Design Guide – 2022
- South and Vale Green Infrastructure Strategy - 2017
- South Oxfordshire Landscape Assessment – November 2017
- National Planning Policy Framework (NPPF) 2023

Documents and drawings reviewed: Documents submitted by Culham Storage Limited as part of the application registered on 9 May 2024.

Conclusion

Holding objection

I have significant concerns about the landscape and visual impact of the proposals as set out in the comments and recommendations below. The current proposals would be contrary to policy ENV1 of the local plan, which seeks to protect the countryside against harmful development and to protect and where possible enhance features that contribute to the nature and quality of landscapes, including areas or features of cultural and historic value, also to policies DES1 and DES2 which require development to respect local landscape character. The proposals would result in a loss of visual openness in the Green Belt, in an area which has lost significant areas to adjacent strategic allocations, and would be detrimental to the environmental quality of remaining green belt land, contrary to local plan policy STRAT 6.

Comments

The site

The site is located immediately north of the Culham Science Centre (CSC). It is currently farmland, other than an area adjacent to an existing substation within the CSC site, south of Thame Lane. Most of the site lies within Green Belt and the northern areas are within the Grade 1 Registered Park and Garden (RPG) of Nuneham House, it also borders Nuneham Courtenay Conservation Area to the north.

There is a restricted byway along Thame Lane on the southern boundary, which forms part of the long distance Oxford Greenbelt Way, this continues as a footpath alongside the railway line west of the site, within the strategic allocation site (STRAT 9); there are attractive views over the site from the footpath, to woodland and parkland, despite the two sets of pylon lines which cross/ bound the site. A proposed footpath runs north from Thame Lane through the site and parkland. Land to the south of the site, between the railway and CSC site is allocated for employment use.

Landscape Character

The site lies largely within SODC landscape character area 2, Nuneham Courtney Ridge, and within landscape type LCT15, Parkland and Estate Farmland. This comprises the formal C18 designed parkland and associated estate land of Nuneham House. The site lies largely within the 'estate' landscape characterised by large blocks of woodland, open grassland and mature trees. The LCT has a rural, unspoilt and generally enclosed character, with strong woodland and tree cover. The site is adjacent to the CSC site, therefore the character is influenced to some extent by the adjacent development. The CSC site is within LCT 9 Institutions.

Guidelines for character area 2 include:

- *Conserve the agricultural character of Nuneham Courtenay Ridge by managing and restricting, where possible, the development of tall buildings and structures where these would adversely affect views.*
- *Safeguard, maintain and enhance and the characteristic landscape features of existing parklands (particularly at Nuneham Park) including mature trees, avenues of trees, lakes, woods and walls.*
- *Promote, where possible, the conservation of the surviving areas of permanent pasture and promote arable reversion to grassland, particularly within parklands.*
- *Promote small-scale planting of deciduous woodland blocks using locally characteristic species such as oak, ash, hazel, willows and alders.*

Comments

The proposals include three areas of development as follows:

- A connection tower to the existing power lines within the Grade 1 registered parkland, with associated substation.
- A battery storage area (BESS) comprising: 296 battery units housed in shipping containers; 37 inverter houses (12m x 9.5m x 4.05m high), all surrounded by gravel; tracks (4.5m wide) and hard standings; 2.5m weld mesh fencing to the northern and eastern boundaries and 4m high timber acoustic fence to the west and south; security cameras mounted at 4m high; electricity substation with equipment up to 9m high; attenuation lagoon; removal of Thame Lane within the site and upgrading farm track

to tarmac 4.5m wide; mounding on the western and northern boundaries up to 3m high; and hedge, tree, woodland and scrub planting
- An extension to an existing substation within the CSC site with underground cable to connection tower.

They also include an area of wildflower grassland, tree, scrub and woodland planting within the RPG.

The area of site proposed for battery storage provides a valuable transition between the registered parkland and the science centre site. The battery storage covers a considerable area and would be industrial in appearance, spreading industrial development into the countryside. Cross section A shows that the mounding proposed would not screen the inverter houses or battery units from the rising parkland to the north, almost all of which would be visible at year 1, and for some time until planting had become established, particularly in winter. This can be seen in LVIA photomontage 14. Views would extend well into the parkland, see LVIA view 17.

Whilst significant areas of mounding, and woodland, scrub and tree planting are proposed, planting would take time to become established sufficiently to screen the lower elements of the proposals, the taller elements would remain visible in the long term, as shown on the cross sections. Much of the mitigation is located within the historic parkland and the views of the heritage officer should be sought with respect to the acceptability of this, whilst the woodland proposed along the southern edge of the parkland is in a similar location to a belt of woodland shown on OS maps of 1898 - 1942, it does not replicate this, being much more informal in layout, and with the addition of mounding.

Cross section C shows the proposed connection tower, over 14m high, and associated substation with equipment over 7m high, within the Grade 1 registered parkland. This would have a significant adverse effect on the landscape character of the parkland, which would remain in perpetuity, contrary to policy ENV1 of the Local Plan which only permits development where it protects and where possible enhances features that contribute to the nature and quality of landscapes, including, '*vii) areas or features of cultural and historic value'.* The fact that there is an existing pylon route through the parkland does not make it acceptable to introduce additional intrusive features. This should not be located within the historic parkland.

Cross section B indicates that views from the west would be largely screened by mounding, however this would mean blocking current open views towards the parkland from the allocated site and the Oxford Greenbelt Way. No mounding is proposed on the southern side, the photomontage from viewpoint 4 indicates that the 4m high acoustic fence would be visible with the top of the inverter units seen above and the substation clearly visible, all remaining visible in the long term. The substation, with equipment up to 9m high, would also be visible in close proximity and intrusive from the Oxford Greenbelt Way as it runs on the northern side of the CSC site, only limited mitigation (a hedge on the southern side) is proposed. Cross section D shows that the BESS area would be open to views from the Oxford Greenbelt Way on the eastern side, in the vicinity of an existing pylon, see photomontage view 8. The Greenbelt Way is a long distance path and a valuable recreational resource, its value will increase with the new residential allocation. Although it is affected by the adjacent science centre site, there are open views from the path towards the parkland which would be replaced by open views of battery storage and a substation. Mitigation proposals alongside the path are inadequate and in places entirely lacking, with limited set back and a lack of tree planting. A considerable length of the path both west and east of the railway line would be adversely affected.

Recent permitted developments on the northern edge of the CSC site include tree planting on the boundary which will ultimately help to screen and filter views of the development within it.

In order to extend the existing substation, the proposals would remove trees which help to filter existing views into the CSC site, these would not be replaced, resulting in a detrimental effect due both to their loss and to the additional area of substation with no screening. No mitigation is proposed for this.

The site is adjacent to strategic allocations STRAT 8, Culham Science Centre, and STRAT 9, Land adjacent to Culham Science Centre; STRAT 6 notes that where the Green Belt boundary has been altered to accommodate strategic allocations, development should deliver compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. The proposals would be contrary to this aim, resulting in further loss of visually open Green Belt land and detriment to its landscape and visual quality, including when viewed from the adjacent STRAT 9 residential development site, and from the long distance Oxford Greenbelt Way, noise may also be an issue, affecting tranquillity. Whilst it is noted in the LVIA that public access would be allowed to the area of site within the RPG, I also note that it is planned to sell off excess BNG units in this area; this is unlikely to be compatible with recreational use.

LVIA

It is clear from the LVIA summary that landscape issues have not been considered in the choice of location for the proposed BESS, despite its location immediately adjacent to, and partly within, an existing grade 1 RPG, and within Green Belt. Paragraph 5 of the LVIA notes: '*The main driver for locating the BESS at this location is its proximity to an existing substation, the ability to connect to it and the value it brings with regards to increasing grid stability and efficiency.'*

The LVIA assesses the value of the area of site to be developed as a BESS as low, but it does not appear to take into account the function of the landscape in providing a transition between the parkland and the CSC site or give enough weight to its contribution to the setting of the RPG. The effect on the landscape character of the site including the area within the parkland is found to be moderate to major adverse, with a moderate adverse effect remaining after 10 years and a minor beneficial effect after 20 years (8.11). A moderate adverse effect is found to the parkland adjacent to the site at year 1 reducing to a minor benefit at year 10. The assessment separates the impact of the battery storage units from the impact of the taller elements, the additional tower and substations, however these are all part of the same development and should be considered in combination.

The LVIA concludes (paragraph 12) that the proposals would have at worst a neutral effect on visual amenity and ultimately a beneficial effect. This is not reflected in the visual assessment (Table 5) which shows a number of moderate adverse effects to views from the Oxford Greenbelt Way and the registered parkland remaining after 10 and 20 years. I am not clear how the adverse effect on view 13 reduces after 20 years when there is stated to be no mitigation here, this should presumably also remain as moderate adverse. Given the large number of long term moderate adverse effects to views from the Oxford Greenbelt Way, this should be considered as significant.

Overall I consider the adverse effects of the development to be greater than stated. I also consider the impact on the visual openness of the Green Belt to be underestimated, the site is not located within the CSC site as the planning permission quoted and the circumstances therefore very different. The site can be appreciated as an open landscape in views from a considerable length of the Greenbelt Way and from the eastern edge of the residential allocation. The development and associated mitigation will block views and tall structures will remain visible in the long term, resulting in a distinct loss of visual openness. The feasibility of using land both for recreation and as BNG units is questionable.

Recommendations

The proposed development is located in a sensitive area of countryside which provides a transition between the Culham Science Centre site and a grade 1 registered parkland, and which is entirely within Green Belt. It is adjacent to a long distance footpath which provides a valuable recreational resource and will be of increased importance due to the adjacent residential allocation. It is clear that landscape impact has not been considered in the choice of location.

Whilst there is some detrimental effect on the existing landscape character and views, due to the CSC site and existing infrastructure, this would be made worse by the proposals, particularly in the short to medium term. There could be some long term benefit to views south from the park, however the mitigation proposed to achieve this would be located within the parkland and the advice of the heritage officer should be sought with respect to the acceptability of this.

The proposals would result in a loss of visually open Green Belt land in an area which has lost significant areas to adjacent strategic allocations. It would also result in significant adverse impact to the landscape character within a registered parkland and to views from a long distance path. Mitigation is inadequate adjacent to the long distance path, with limited set back and boundaries left open or with minimal planting; noise fencing would also be intrusive.

Of significant concern are:

- The scale and industrial nature of the battery storage proposals, and the resulting adverse effects on the landscape character within the grade 1 historic parkland in the short to medium term.
- The long term adverse effects on the landscape character of the parkland due to the additional tower and substation which would be permanent; locating this within the parkland is not acceptable.
- The loss of visual amenity to the long distance footpath, which would become contained by industrial development on both sides, and inadequate mitigation.
- The loss of visually open Green Belt land.

The current proposals would be contrary to policy ENV1 of the local plan, which seeks to protect the countryside against harmful development and to protect and where possible enhance features that contribute to the nature and quality of landscapes, including areas or features of cultural and historic value, also to policies DES1 and DES2 which require development to respect local landscape character. The proposals would be detrimental to the environmental quality of remaining green belt land, contrary to local plan policy STRAT 6.

Hazel Osborne CMLI

Landscape Officer

APPLICATION WEB COMMENTS FORM

Information available for public inspection and available on our website

Location : Land to the north of the Culham Science Centre Thame Lane near Clifton Hampden OX14 3GY
Proposal : 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.(A hard copy of the Environmental Statement can be viewed at South Oxfordshire District Council, Abbey House Abbey Close Abingdon OX14 3JE).REPRESENTATIONS IN WRITING BY 28 JUNE 2024
Application Reference : P24/S1498/FUL - 36

Please complete

Your name :	Air Quality
Your address :	(South Oxfordshire & Vale of White Horse District Councils)
Date :	11 June 2024

Use the space below for your comments

Thank you for consulting this Service regarding the above application.

We have reviewed this application and its supporting EIA and have no observations to make on the application from an air quality perspective .

APPLICATION WEB COMMENTS FORM

Information available for public inspection and available on our website

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Application Reference : P24/S1498/FUL - 37

Please complete

Your name :	Charlotte Cottingham
Your address :	South Oxfordshire District Council Abbey House, Abbey Close Abingdon Oxfordshire OX14 3JE
Date :	21 May 2024

Use the space below for your comments

The Didcot Garden Town team has been consulted on the planning application for P24/S1498/FUL, which lies across the northern boundary of the Didcot Garden Town Area of Influence.
While acknowledging that the site is in the Green Belt and will therefore be subject to planning scrutiny with regard to any potential impact on the openness of the Green Belt, the garden communities team is generally supportive of the application, which aligns with Didcot Garden Town principles.
A large part of the proposals comprise landscaping, which is designed to screen the proposed development and enhance biodiversity with new tree belts and woodland planting across an area that has overhead power lines crossing it.
Access and active travel - the landscaped area is proposed to be fenced off and therefore not open for public access but it should be noted that the line of a proposed Oxfordshire County Council Public Right of Way (NUNFP03494) crosses the site through the landscaped area and may require extensive realignment.
The western boundary of the site appears to be set back from the existing

Public Right of Way (CULFP05) but detailed design of the western boundary fence may need to take onto account views from this footpath, perhaps allowing glimpses into the landscaped area.
Didcot Garden Town is the gateway to Science Vale and Culham Science Centre is a key site within Science Vale. The application for a battery energy storage system connected to the National Grid is a step towards achieving net zero and will provide more flexible, resilient and stable energy systems for Culham Science Centre.

APPLICATION WEB COMMENTS FORM

Information available for public inspection and available on our website

Location : Land to the north of the Culham Science Centre Thame Lane near Clifton Hampden OX14 3GY
Proposal : 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.(A hard copy of the Environmental Statement can be viewed at South Oxfordshire District Council, Abbey House Abbey Close Abingdon OX14 3JE).REPRESENTATIONS IN WRITING BY 28 JUNE 2024
Application Reference : P24/S1498/FUL - 38

Please complete

Your name :	Gordon Learoyd
Your address :	Rye Farm Cottage Culham Abingdon OX14 3NN
Date :	22 May 2024

Use the space below for your comments

As someone who works at Culham Science Centre, lives within earshot of this new proposal and commutes daily past this site along the Thames path. I have no concerns of this application.

Historic England

[redacted]

South Oxfordshire District Council
Abbey House
Abbey Close
Abingdon
Oxfordshire
OX14 3JE

[redacted]

Our ref: P01577936

10 July 2024

Dear [redacted]

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

Historic England understands the need for infrastructure to support the transition to net zero energy production in the UK. There is existing electricity infrastructure in this area which we understand makes it a suitable place for more. However, we identify clear harm to a highly significant registered parkland through the position of the proposed development and which is wholly exacerbated by the very poor landscaping proposals and we have deep concerns about the proposals.

We recommend the Council interrogate the location of the connection tower and whether it can be moved to reduce harm, amongst other possible amendments to layout. Where residual harm remains, we strongly urge the Council to seek meaningful heritage benefits that should then be weighed in the balance against the great weight that should be given to conservation of the registered parkland.

Historic England Advice

Significance of Nuneham Courtenay and surroundings

Nuneham is one of the best examples in Britain of a planned estate village, created

after the first Lord Harcourt decided in 1761 to move the inhabitants to the new turnpike road (the present main road) in order to make a beautiful landscape garden surrounding his new villa (the core of the present Nuneham House).

Nuneham Park is a Grade I registered park and garden and has 3 principal phases, all designed to reflect the owners' wealth and power.

All Saints Church was the principal built feature of the 1st Lord Harcourt's arcadian garden designs (beyond the main villa house) and was designed in a very particular way to take advantage of the topography with sweeping views over the Thames valley and rural vista north towards the dreaming spires of Oxford.

The Flower Garden at Nuneham Courtenay was begun by the second Lord Harcourt before he inherited in 1777. It was laid out along informal principles by the poet William Mason according to the naturalistic principles espoused by Jean-Jacques Rousseau, who had visited Nuneham. Described in 1782 as 'such a flower garden as excels every flower garden which ever existed in history or romance', it was probably the first flower garden of its type in Britain, influencing countless later gardens, and it became a major attraction for visitors. It survives largely intact, together with its classical Temple of Flora.

Lancelot Brown was brought in by the second Lord Harcourt in 1778 to further improve the landscape and to lay out the grounds south of the house. The most important feature here is Carfax Conduit, a major example of Jacobean architecture removed from Carfax in Oxford city to improve the traffic flow and re-erected here as a focal point of the view southwards from outside the house, and from the riverside. But the enhancement of the main Abingdon driveway was, in both design and intent, a vitally important feature of his naturalistic reimagining of the estate. The sweeping southern drive took in naturalistic tree planting set within bucolic pasture, enclosed within a shelter belt round the perimeter of the park, amongst which paths and rides took you through the landscape, carefully unveiling experiences as you travel around.

The south drive continued beyond Abingdon Lodge (the gate houses) and was linked to a tree-lined avenue connecting the estate with the newly built Culham railway station (built 1844 and grade II* listed itself). This avenue appears to have been subsumed in to the Culham airfield (RNAS Culham/ RMS Hornbill) from 1944 onwards. Remnants of this avenue appear to remain as do a number of buildings from the RNAS Culham. The historical layout which connects to Nuneham House and

parkland also connects with and includes infrastructure associated with the railway. The history of the RNAS Culham is also of interest.

Proposals

This application is for battery energy storage system (BESS), comprising a 500 megawatt (MW) battery storage facility laid out in 296 shipping containers, with 37 inverter houses together with a 14m high connection tower, substation and access tracks, all enclosed within perimeter fencing. Landscaping in the form of bunds, tree planting, hedging and areas of water are also proposed.

Impact of the scheme on Nuneham Courtenay registered landscape

The proposed battery energy storage system would result in clear harm to a highly significant designated landscape. We also consider that the proposal has the potential to result in cumulative harm to the registered park and garden when taken together with the current live application for a solar farm to the north, should that scheme gain planning permission in its current form alongside this proposal.

Whilst the Culham Science Centre, some 180m south of the registered parkland, together with existing electricity infrastructure in the form of pylons and substations has altered the historical environs of the estate, the remaining largely undeveloped space between the parkland and the CSC allows it to remain a separate entity that isn't encroached upon by industrial development. This matters because it allows for a degree of appreciation of the parkland as a separate, private estate.

The proposals would further erode the remaining vestiges of the past layout of the estate (where it exists outside the registered area), which still contributes to its significance and our understanding of it.

This erosion is more serious within the boundaries of the registered area where deeply harmful and unsympathetic landscaping is proposed, along with the wholly alien feature of the 14m high connection tower. The proposed position of these features within the registered area would to all intents permanently remove the chance of meaningful restoration of lost planting in these areas. Restoration in the south of the parkland was a key recommendation within the 2019 Parkland Management Plan for the estate and whilst not a statutory document clearly illustrates, from a deep understanding of the whole estate, what sensitive and sympathetic improvements would be. (The Parkland Management Plan 2019 was produced by Askew Nelson Ltd - if the Council and applicant do not have access to this we recommend seeking a copy from the estate owners - we have an electronic copy).

Planning Policy

The National Planning Policy Framework (the Framework) sets out at paragraph 201 that Councils should, having understood the signficance of heritage assets, look to avoid or minimise conflict between conservation and the proposals. Paragraph 205 makes very clear that great weight should be given to conservation of assets and the more significant the asset the greater the weight, regardless of the level of harm. Any harm to or loss of significance to designated heritage assets should be clearly and convincingly justified (paragraph 208) and this harm should be weighed against public benefits of the proposal (paragraph 209).

Supporting the Framework is the National Planning Practice guidance, that provides useful supporting commentary, which is relevant for this case. In particular paragraph 013 sets out 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.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, 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.

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.

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.

Opportunities to avoid or reduce harm

There are 2 existing allocations in the local plan very nearby (STRAT8 and STRAT9) and we question whether if not all, some of the proposal could or should be located

within one of these.

We recommend the Council interrogate further whether the harmfully alien feature of the connection tower could be positioned outside the registered area or could be lower in height, in order to reduce the harm it causes to the parkland.

Could the proposed features be sunken into a modified topography, and when combined with better planting could help reduce visibility and harm.

The Parkland Management Plan 2019 sets out a wide range of ways that the parkland can be restored. As mentioned above, best practice is for the design for the BESS to be informed by and make reference to this document. This is especially pertinent in relation to proposed restoration of landscape features which, currently, widely miss the mark and fail to take any real opportunity for heritage benefits.

Where any residual heritage harm remains (following further efforts to reduce harms) to this very special landscape we strongly urge the Council seeks to secure significant heritage benefits. It is critical to bear in mind that Grade I landscapes are the most important designed landscapes in the country, the NPPF makes clear that great weight should be given to their conservation (regardless of the level of harm), because they are a precious, finite cultural resource. A key feature of restoration in the southern portion of the park would be the reintroduction of a naturalistic shelter belt in its original location and supplementary or restoration planting of the woodland pasture (at least for landscaping to demonstrably respond to Brownian naturalistic planting principles and the restoration of features where possible). A longstanding aspiration for the burying of the electricity lines and removal of pylons seen in views from All Saints (to the north) would be a considerable heritage benefit.

We would welcome the opportunity to review proposed amendments and proposals for sympathetic restoration of the parkland.

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

Historic England

[redacted]

[redacted]

4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

FW: PLANNING APPLICATION P24/S1498/FUL : CULHAM, RESTRICTED BYWAY NO.4 / CLIFTON HAMPDEN, RESTRICTED BYWAY NO.16 (OXFORD GREEN BELT WAY)

Planning South <planning@southoxon.gov.uk>
Thu 06/06/2024 11:38

[redacted]

From: Nicholas John Moon [redacted]
Sent: Saturday, June 1, 2024 8:34 PM
To: Planning South <planning@southoxon.gov.uk>
[redacted]
Subject: PLANNING APPLICATION P24/S1498/FUL : CULHAM, RESTRICTED BYWAY NO.4 / CLIFTON HAMPDEN, RESTRICTED BYWAY NO.16 (OXFORD GREEN BELT WAY)

CPRE The countryside charity Oxfordshire

Campaigning to protect our rural county

SOUTH OXFORDSHIRE AREA

Dear Mr. Duffy,

From a recent list of planning applications in the Western Area we have noticed this one which affects Culham RB4 / Clifton Hampden RB16 (Thame Lane), part of the Oxford Green Belt Way. While this well-used public right of way linking Abingdon and Culham with Clifton Hampden is bounded to the south by the Culham Science Centre, it still remains pleasant to walk or ride as it offers wide views to the north into Nuneham Park and across the Thames Valley. We therefore strongly object to the proposed development of a BESS on the north side of Thame Lane on public rights of way grounds and wish to urge your Council to seek its relocation south of Thame Lane with the rest of the Science Centre so that the amenity value of Thame Lane can be retained. We therefore trust that your Council will recognise the undesirability of allowing the Science Centre to sprawl into the open countryside north of Thame Lane and the importance of Thame Lane as the spine of the rights of way network in the Culham area which could be ruined by allowing this development.

In closing, may I, however, remind you that the above comments solely concern the effect of the proposed development on public rights of way and are without prejudice to any which may be made by our planning officer on more general planning issues.

Yours sincerely

NICK MOON
Rights of Way Consultant

APPLICATION WEB COMMENTS FORM

Information available for public inspection and available on our website

Location : Land to the north of the Culham Science Centre Thame Lane near Clifton Hampden OX14 3GY
Proposal : 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.(A hard copy of the Environmental Statement can be viewed at South Oxfordshire District Council, Abbey House Abbey Close Abingdon OX14 3JE).REPRESENTATIONS IN WRITING BY 28 JUNE 2024
Application Reference : P24/S1498/FUL - 42

Please complete

Your name :	Tim Barlow
Your address :	16 Thame Lane Culham Abingdon OX14 3DS
Date :	10 June 2024

Use the space below for your comments

We are residents on Thame Lane and fortunately I work in the renewable sector industry. I would like to see sufficient evidence being provided to the local community on how the project will manage its noise pollution. There is demonstrable evidence to show that the 'noise walls' planned would not be mitigate against the noise. How can you guarantee against material disruption for us living here and the school / nurseries around that they will not be impacted? Could you also describe how you are going to try and prevent the planned 4 metre wall not being a material eye sore to the countryside? Can you guarantee that no construction traffic will go down Thame Lane? Can you also explain whether walking from Thame Lane we would be able to enter the proposed park?

RE: Planning Consultation - P24/S1498/FUL - CLI

Planning_THM <Planning_THM@environment-agency.gov.uk>

Wed 10/07/2024 14:10

To:Planning Registration <registration@southandvale.gov.uk>

****EXTERNAL****

Our ref: WA/2024/131539

Dear team,

Thank you for consulting us on this application. Unfortunately, we are currently behind with reviewing consultations. We are aware that we have already missed our 21 day statutory consultation deadline for this application, for which we apologise. We are experiencing a significant increase in the number of consultations and enquiries that we receive. We appreciate your patience as we start to implement measures to reduce our response times.

We would like to notify you that we will aim to respond to this consultation within approximately 8 – 10 weeks.

Kind regards,

Sustainable Places | Thames Area
Environment Agency | Red Kite House, Howbery Park, Benson Lane, Crowmarsh, OX10 8BD

From: registration@southandvale.gov.uk <registration@southandvale.gov.uk>
Sent: Friday, June 14, 2024 2:16 PM
To: Planning_THM <Planning_THM@environment-agency.gov.uk>
Subject: Planning Consultation - P24/S1498/FUL - CLI

Application number P24/S1498/FUL has been deposited with the District Council as Local Planning Authority.

The consultation document is attached below.

Alternatively, you can submit your comments regarding this application online by clicking this link.

Full details of this application can be found on our website here.

creating a better place

Environment Agency

South Oxfordshire District Council
Eastern Avenue
Mitlon Park
Abingdon
OX14 4SB

Our ref: WA/2024/131539/01-L01
Your ref: P24/S1498/FUL

Date: 25 July 2024

Dear Sir/Madam

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 CULHAM SCIENCE CENTRE, THAME LANE OX14 3GY

Thank you for consulting us on the above application on 14/06/2024. Apologies for our delay in responding to you. We have reviewed the application in line with our planning remit.

Environment Agency position

We have **no comments** to make on the submitted application. However please consider the informative provided below.

Informative – BESS facilities

Energy storage will play a significant role in the future of the UK energy sector. Effective storage solutions will benefit renewables generation, helping to ensure a more stable supply and give operators access to the Grid ancillary services market. Currently, DEFRA does not consider the need to regulate the operation of battery energy storage systems (BESS) facilities under the Environmental Permitting Regulations regime. These facilities also do not currently fall within the Control of Major Accident Hazards Regulations.

Although these are a source of energy to the National Grid they do not result in a direct impact to the environment during normal operations. However, the potential to pollute in abnormal and emergency situations should not be overlooked. Applicants should consider the impact to groundwater and surface waters from the escape of firewater/foam and any metal leachate that it may contain. Where possible the applicant should ensure that there are multiple ‘layers of protection’ to prevent the source-pathway-receptor pollution route occurring. Proposals should avoid being situated near to rivers and sensitive drinking water sources.

An important factor that can be overlooked by parties involved in new battery storage projects or investing in existing projects is that battery storage falls within the scope of the UK's producer responsibility regime for batteries and other waste legislation. This creates additional lifecycle liabilities which must be understood and factored into project costs, but on the positive side, the regime also creates opportunities for battery recyclers and related businesses. Operators of battery storage facilities should be aware of the Producer Responsibility Regulations. Under the Regulations, industrial battery producers are obliged to:

- Take back waste industrial batteries from end users or waste disposal authorities free of charge and provide certain information for end users.
- Ensure all batteries taken back are delivered and accepted by an approved treatment and recycling operator.
- Keep a record of the number of tonnes of batteries placed on the market and taken back.
- Register as a producer with the Secretary of State.
- Report to the Secretary of State on the weight of batteries placed on the market and collected in each compliance period (each 12 months starting from 1 January).

Putting aside the take back obligations under the producer responsibility regime, batteries have the potential to cause harm to the environment if the chemical contents escape from the casing. When a battery within a battery storage unit ceases to operate, it will need to be removed from site and dealt with in compliance with waste legislation. The party discarding the battery will have a waste duty of care under the Environmental Protection Act 1990 to ensure that this takes place. Many types of batteries are classed as hazardous waste which creates additional requirements for storage and transport.

The Waste Batteries and Accumulators Regulations 2009 also introduced a prohibition on the disposal of batteries to landfill and incineration. Batteries must be recycled or recovered by approved battery treatment operators or exported for treatment by approved battery exporters only.

Advice to applicant - Other Consents

As you are aware we also have a regulatory role in issuing legally required consents, permits or licences for various activities. We have not assessed whether consent will be required under our regulatory role and therefore this letter does not indicate that permission will be given by the Environment Agency as a regulatory body. The applicant should contact 03708 506 506 or consult our website to establish if consent will be required for the works they are proposing. This includes any proposal to undertake work in, over, under, or within 8 metres of the top of the bank of a designated Main River, called a Flood Risk Activity permit. Please see http://www.environment-agency.gov.uk/business/topics/permitting/default.aspx

Closing comments

Thank you again for consulting us on this application. Our comments are based on the best available data and the information as presented to us. Should you require any

additional information, or wish to discuss these matters further, please do not hesitate to contact me. Please quote our reference number in any future correspondence.

Yours faithfully,

Mr Nathan Davis
Planning Advisor
Direct e-mail: Planning_THM@environment-agency.gov.uk
Direct dial: 02030251755

End

70 Cowcross Street, London EC1M 6EJ
Phone: (+44/0) 207 608 2409
Email: enquiries@thegardenstrust.org
www.thegardenstrust.org

[redacted]

Research - Conserve - Campaign

21st June 2024

Ben Duffy
South Oxfordshire District Council
Abbey House
Abbey Close
Abingdon
Oxon OX14 3JE
planning@southoxon.gov.uk

Ref : P24/S1498/FUL - 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.(A hard copy of the Environmental Statement can be viewed at South Oxfordshire District Council, Abbey House Abbey Close Abingdon OX14 3JE; Land to the north of the Culham Science Centre, Thame Lane near Clifton Hampden.

Thank you for consulting the Gardens Trust (GT), a Statutory Consultee with regard to proposed development affecting Nuneham Courtenay, a Grade I registered park and garden (RPG) listed by Historic England (HE) on their Register of Parks and Gardens. We have liaised with our colleagues in the Oxfordshire Gardens Trust (OGT) and their local knowledge informs this joint response.

Nuneham Courtenay is a country house surrounded by an C18 landscape park and pleasure grounds laid out in three phases. The first in the 1760s - the first Earl Harcourt's classical landscape to offset his Greek 'temple' (church); the second, William Mason's picturesque landscape of 1777 for the second Earl (Mason having laid out a famous flower garden here in 1771); and finally the parkland laid out by Lancelot Brown 1779-82 (supervised by the second Earl and Mason), when he also laid out Brown's Walk in the pleasure grounds. A pinetum and other work was carried out by W S Gilpin, 1832.

We have considered the online documentation and strongly object to this proposal which will cause substantial and permanent harm to the Grade I listed RPG and its setting. In addition, your officers must consider the proposal in a broader context than just the proximity of the existing science park to the south of the RPG. The separate proposal for a solar farm (P24/S1336/FUL) to the north of the RPG together with the existing permission for another extensive solar farm at Nineveh Farm outside Nuneham Courtenay will have a cumulative effect on the surrounding landscape. The open agricultural fields which contribute so much to the visual impact of the setting will be seriously diminished.

The BESS storage facility will have a damaging effect during both the commissioning and deconstruction phases. In addition, the mitigation measures proposed : the additional planting, the raised bund, the ponds and the accoustic fencing will all increase rather than minimize the damage to the historic character of this sensitive designed landscape. The impact of the rows of battery storage units and associated infrastructure over a period of

40 years will destroy the landscape setting over a lengthy period of time and the 14m high transmission tower and its compound will remain as a permanent intervention within a RPG and conservation area which are both recognized as being of the highest national importance.

This is a highly damaging proposal and we urge your officers to refuse it.

Yours sincerely,

Margie Hoffnung
Conservation Officer

APPLICATION WEB COMMENTS FORM

Information available for public inspection and available on our website

Location : Land to the north of the Culham Science Centre Thame Lane near Clifton Hampden OX14 3GY
Proposal : 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.(A hard copy of the Environmental Statement can be viewed at South Oxfordshire District Council, Abbey House Abbey Close Abingdon OX14 3JE).REPRESENTATIONS IN WRITING BY 28 JUNE 2024
Application Reference : P24/S1498/FUL - 45

Please complete

Your name :	James Owens
Your address :	Hampden House Abingdon Road Clifton Hampden Abingdon OX14 3EG
Date :	21 June 2024

Use the space below for your comments

I have strong concerns with this application particularly in regard to noise pollution. There is already an unacceptable level of continuous industrial hum from cooling fans and electrical equipment at the Culham site. This is particularly noticeable at night when it can be at levels which can interrupt sleep and impact health. What mitigations are in place to prevent noise pollution from electrical equipment associated with the battery storage. Noise pollution from these battery storage projects is a very significant and well publicised issue impacting human and wildlife health. This needs to be addressed appropriately.

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Application Reference : P24/S1498/FUL - 46

Please complete

Your name :	CPRE South Oxfordshire District Committee
Your address :	20 High Street Watlington OX49 5PY
Date :	27 June 2024

Use the space below for your comments

Response attached.

The countryside charity
Oxfordshire

Campaigning to protect our rural county

CPRE South Oxfordshire District
c/o CPRE Oxfordshire
20 High Street
Watlington
Oxfordshire OX49 5PY

Tel: 01491 612079
campaign@cpreoxon.org.uk
cpreoxon.org.uk

Ben Duffy– Case Officer
South Oxfordshire District Council
Via email: planning@southoxon.gov.uk

27th June 2024

RE: P24/S1498/FUL

Land to the north of the Culham Science Centre Thame Lane near Clifton Hampden OX14 3GY -
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.

Dear Ben Duffy

The Campaign to Protect Rural England Oxfordshire [CPRE] works to improve, protect and preserve the landscape of Oxfordshire and its towns and villages for the benefit of everyone.

The CPRE South Oxfordshire Committee OBJECTS to this application for large-scale building with the Oxford Green Belt. Hazel Osbourne, Landscape Officer, SODC, and Samantha Allen, Heritage officer, SODC, clearly set out many reasons to reject the application, including the harm the development will cause to the landscape, the Oxford Green Belt and on heritage assets. We fully support the officers' reasons to reject this application and will not repeat them here. Except to say that The LUC Oxfordshire Green Belt Study[1] showed that this site as part of Broad Area 6:

- rated highly in meeting Purpose 3 of the Green Belt – to safeguard the countryside from encroachment.
- rated highly in meeting Purpose 4: To preserve the setting and special character of historic towns

Development should be restricted to areas identified under STRAT 8 Culham Science Centre & STRAT 9 Land adjacent to Culham Science Centre.

The committee also objects to this application as it will result in the loss of Best & Most Versatile agricultural land (Grade 2 & 3a) for over 40 years.

The design & access statement dismisses the loss of views / PRoW as insignificant. The response from our RoW consultant and the landscape officer do not agree with the appellant's arguments. The future urban sprawl on the adjacent greenfield site allocated for development under STRAT 9 will ruin the amenity value of Thame Lane PRoW and this development will cause further harm to the amenity value of the PRoWs in this area.

Therefore, this application is *unacceptable in* principle, the development would cause a *significantly adverse effect to the Green Belt, landscape, heritage and amenity assets,* contrary to local & national planning policies, including but not limited to LP2035 DES9. Policy DES9: Renewable and Low Carbon Energy paragraphs i, ii, iii) and v).

There are no exceptional nor special circumstances to support approval of this application.

Yours sincerely

The Committee of South Oxfordshire District of CPRE

[1] LUC Oxford GB Study 2015