

Further Heritage Addendum

**Land west of A4074, to the northwest of
Nuneham Courtenay, South Oxfordshire.**

On behalf of RES Ltd.

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1. Introduction

- 1.1. This Further Heritage Addendum has been prepared to provide additional consideration of the proposed solar scheme at land west of the A4074, Nuneham Courtenay (Planning ref: P24/S1336/FUL) in relation to certain heritage assets following the receipt of a further round of consultation responses from a number of parties.
- 1.2. More specifically, this Further Heritage Addendum has been prepared following the granting of access to the Nuneham Courtenay Registered Park and Garden and a site visit undertaken on 8th January 2025 which has allowed the preparation of additional visual material and the consideration of comments made by consultees on this asset in the previous round of consultation.
- 1.3. The Further Heritage Addendum has also considered the assessment of harm and made consideration of whether this harm represents a Significant or Not Significant effect to the Nuneham Courtenay Conservation Area. The methodology utilised to assess the harm is the same as utilised within the Heritage ES Chapter and set out at paragraphs 8.2.17 – 8.2.26 of that Chapter.
- 1.4. This document is a supplement to the Heritage Addendum of October 2024 as well as the original Heritage Baseline and ES Chapter and accords with the methodology laid out in the ES and is consistent with previous documentation. Historic background information and detailed discussion of significance and the contribution made by setting to the significance of relevant heritage assets can be found within these original documents. Relevant information is reproduced here, but these documents should be read together.

2. Consultation Comments

2.1. Further consultation responses were received from a number of the same stakeholders as previously. Responses relating to heritage were received from:

- Oxford Preservation Trust (5th November 2024);
- Historic England (12th December 2024);
- Oxfordshire Architectural and Historic Society (6th November 2024);
- The Gardens Trust (8th November 2024);
- Oxfordshire South Heritage Officer (18th December 2024);
- Oxfordshire County Council Archaeologist (6th November 2024).

2.2. Once again the comments can generally be grouped as asserting: (n.b. Not all comments were made by all consultees, this represents comments from across the range)

- Under-estimation of harm to Nuneham Grade I Registered Park and Garden (RPG);
- Lack of assessment of Carfax Conduit;
- Concerns over glint and glare;
- Disagreement with Pegasus assessment of the level of harm to grade II* listed All Saints Church, Nuneham RPG and Nuneham Conservation Area;
- Need to address concerns regarding archaeology.

General Comments

2.3. The Historic England response of 12th December should be noted. Whilst requesting further information (which this Response provides), Historic England concur with the level of harm arising from the Scheme to the significance of the RPG and All Saints Church as being less than substantial at the lower end of the scale (though Pegasus note that we concluded at the low end of the grade II* All Saints Church – Historic England say a lower level of harm – but in general we are in agreement regarding these two designated assets).

2.4. In the Historic England response, it is noted that there is concern about future tree management revealing more of the view from the RPG and All Saints Church. Pegasus would note that this location is a Conservation Area and therefore any tree removal would require permission.

2.5. Historic England requested further visual information for views from Carfax Conduit and also that the visuals, including cumulative visuals of the consented Ninevah Farm scheme – these have been updated and provided as part of this additional information and can be found within the LVIA further information package.



- 2.6. The Oxford Preservation Trust response of 5th November 2024 continues to maintain their allegation of substantial harm to: *'the settings of the village of Nuneham Courtney and its exceptional number of listed buildings, and the Grade I listed Nuneham Registered Park and Gardens'* with the Gardens Trust also maintaining a finding of substantial harm to the Registered Park and Garden (RPG) in their 8th November 2024 response.
- 2.7. Pegasus have set out in their previous Heritage Addendum of October 2024 at paragraph 2.6 –2.9 why this is not considered to be the case – given the interpretation of what constitutes substantial harm to the significance of a heritage asset in case law, national policy and national guidance.
- 2.8. The Oxford Preservation Trust response also continues to allege the applicant has not put forward 'clear and convincing justification' for alleged harm. Again, this is addressed in the previous Pegasus response at paragraph 2.4 and not repeated here.

Glint and Glare

- 2.9. The Historic England response of 12th December 2024 and the Heritage Officer Response of 18th December 2024 both again reference glint and glare and it is noted that Historic England retain concerns. However the specialist assessors of glint and glare have examined this matter and concluded that significant impacts to observers at All Saints Church arising from the glint and glare effects from the proposed development would not be possible, as set out within the Peger Power *Supplementary Statement on All Saints Church* prepared in October 2024 which concludes:

"It is concluded that significant impacts to observers at All Saints Church would not be possible due to potential glint and glare effects from the proposed development."

3. Addendum

- 3.1. At the time of writing the Environment Statement Chapter, there was the belief that the proposed Site no longer formed part of the wider Nuneham Courtenay estate following the sale in 2016. It was established recently that this was not the case and the land within the Site was in the ownership of the Nuneham Estate.
- 3.2. It is noted that the Nuneham Registered Park and Garden (RPG) area, though largely in the hands of the Estate, is not entirely within one ownership. For example, Church of All Saints is in the hands of the Churches Conservation Trust and the Oxford Arboretum remains in the hands of Oxford University. It is the case, therefore, that with regards to the 'Nuneham Estate' of old, that land owned by the Harcourts and forming the RPG is no longer one unified entity, but rather broken up into piecemeal elements.
- 3.3. Comments regarding the lack of continued association between Site and Nuneham were made within the Heritage Technical Baseline prepared to support the ES Chapter and application with reference to Nuneham RPG and Church of All Saints with the following comment: *'The Site was once located in the wider Nuneham estate but as the Sales catalogue of 2016 demonstrated, the land which included the Site was sold off as a separate Lot to the designed elements of the estate. As such, since 2016, this link is no longer extant.'*
- 3.4. As stated above, in the case of Church of All Saints, it is indeed the case that the land of the church itself, and thus the asset, is not now in the ownership of the Nuneham Estate but in the ownership of the Churches Conservation Trust. However, the issue of land ownership had no bearing on the assessment of potential harm arising from the proposed Scheme as it was the historic association which was the element of interest that contributed to significance. This can be seen at paragraphs 8.4.20 – 8.4.24 of the Heritage ES Chapter which assesses the effect of the proposed Scheme upon the significance of this asset. Within these paragraphs, issues of land ownership are not raised and thus, not material to the conclusion relating to this asset.
- 3.5. In the case of the wider Nuneham RPG, it is also the case that this perceived lack of current association at the time of writing had no bearing on the assessment of harm arising from the Scheme as undertaken within the ES Chapter. This can be demonstrated by a review of paragraphs 8.4.14 – 8.4.17 of the Heritage ES Chapter which sets out the assessment of potential effects arising from the proposed Scheme and land ownership whether current or historic, is not mentioned. It is therefore not material to decision-making.
- 3.6. Discussion was also had regarding landownership and the grade II listed building of Lower Farmhouse. This is a slightly different situation in that at the time of the 1838 tithe map, Lower Farmhouse and the land within the Site were all under the ownership of the Archbishop of York, Edward Vernon-Harcourt who inherited the estate after a period when the estate was fallow – without owner from 1809–1830. However, within the 2016 Sale Particulars of the Estate, Lower Farmhouse itself was not included within the lots of land for sale in 2016 and it is confirmed through title plans received from the current estate owners that Lower Farmhouse no longer is part of the Nuneham Estate. Therefore, whilst there may be an historic association, this is no longer present for this asset.
- 3.7. Whilst it is acknowledged that a small error was made, as demonstrated, the knowledge of the current land ownership situation makes no difference to the assessments carried out.



That is, the continued association between estate and the Site does not enhance or increase any level of harm that has already been identified.

Nuneham Courtenay Conservation Area

- 3.8. The Historic England consultation response welcomes the additional commentary regarding the Nuneham Conservation Area. The comments from Historic England and the Heritage Officer both agreed with the Pegasus conclusion as set out in the previous Heritage Addendum that the proposed Scheme would not cause any harm to the village element of the Conservation Area. Both responses commented on the overlap of the Conservation Area and the RPG and alleged harm to the significance of the Conservation Area in those areas where harm has been identified to the RPG.
- 3.9. In order to respond to these comments and to ensure the most robust assessment is being presented, this asset was considered once again. The Conservation Area was previously not assessed as experiencing harm as the historic core and the principal contributing factors to the special architectural and historic interest of the Conservation Area would not be affected by the Scheme – a position it is considered that the consultees are in agreement with. However, it is acknowledged that the Conservation Area covers a very large area indeed and overlaps with the boundary of the RPG.
- 3.10. It is acknowledged that harm is identified to the RPG which lies within the Conservation Area, however Pegasus were wary of double counting assets and levels of harm. However again, to be transparent and robust, these overlapping elements were considered once again and assessed in accordance with the methodology set out within the ES Chapter prepared by Pegasus to support this application.
- 3.11. As per the methodology set out in the Heritage ES Chapter, the Nuneham Conservation Area is a designated heritage asset. Given the association of the village and the parkland together, it is considered to be a designated asset of the highest significance. The Conservation Area is described at Section 3 of the previous Pegasus Heritage Addendum, however the main elements of the significance and contribution made by setting are set out here again for clarity.
- 3.12. As acknowledged, there is no Conservation Area Appraisal document for this asset. However, the significance of this asset is considered to be formed of:
- The architectural integrity of the settlement – the uniformity of the buildings including the colour of their paintwork and architectural detailing;
 - The linear form of the village;
 - Open spaces between the pairs of cottages;
 - Simple, low paling fences and open spaces between them; and
 - The relationship of the village to the park from which the original community was displaced;

- The designed landscape of the registered park and garden – which facilitated the creation of Nuneham Courtenay – including the remnant features of the Brown designed landscape; and
- Architectural elements of the highest quality within the parkland – primarily the Grade I and scheduled Carfax Conduit, Grade I Nuneham House and grade II* All Saint’s Church.

- 3.13. The setting of the Conservation Area contributes to this significance, but this is clearly less than that made by the built form and open spaces within the Conservation Area boundary. The setting is limited due to the scale, but it is considered that the immediate surrounding landscape and open fields to the east reinforce the linear layout of the settlement. In terms of views there are limited views out of the settlement. Views north from within the settlement are limited by the rising ground and views south are similarly blocked by vegetation. The strong, linear form of the village and the building line being so close to the carriageway means that there is a very enclosed feeling with few glimpses beyond to the east and west. There are footpaths leading west from the rear plots into the parkland of Nuneham which offer longer distance views to the rear of the built form but further along these paths to the west, these views of the settlement diminish.
- 3.14. The setting also includes the views out of the designed RPG, including views towards Abingdon from Whitehead’s Oak, views north from All Saints Church, and views along the river valley of the Thames. Views into the area of the Conservation Area overlap with the RPG also contribute – in particular the views from the Thames looking up at the house. These are key views and have, since the first construction of the house, unusually been available freely to the public travelling up and down Thames on boats.
- 3.15. The Construction phase of the Proposed Development is not considered to cause any harm to the significance of this asset.
- 3.16. The Operational Scheme would not cause any harm to the historic core of the planned village. The built form of the settlement was not designed to have an extensive approach or approach which signalled the presence of the built form. The start of the built form was marked with emphasis, but this emphasis was one of marking the start of built form rather than welcoming a traveller along the road from a long distance north that the village approached. The intention appeared to be to screen the village in views from the north in contrast to the southern approach from Henley which has taller buildings set parallel to the road, and therefore not closing off this approach in the same way as the northern end.
- 3.17. There is no pedestrian access along the A4074 beyond the extent of the car-park at the northern edge – including along the edge of the Scheme. The A4074 is a fast-moving road and therefore it is the case that the only users of the road entering the settlement from the north would be car users or cyclists, travelling at speed with views which would be changing all the time.
- 3.18. When travelling south, by the time any built form of Nuneham comes into view, the proposed Scheme is well behind the viewer. It is also the case that the first experience of built form when entering Nuneham is the car park of the disused Harcourt Arms, later a restaurant and new built form at Yew Tree Courtyard both of which are in the Conservation Area and form a modern buffer to that northern edge on arrival.

- 3.19. The ability to understand the connection with the estate, the origins and striking layout of the settlement will not experience change. There will be no experience of the Scheme and the historic core of the settlement in any of the same views and if travelling south towards the village, there would be no time at which the proposed Scheme would be present within a wider arc of view with the settlement given the topography and the distance between the southern Site boundary and the northern boundary of the Conservation Area.
- 3.20. The Operational Scheme will, from day 1, distantly appear in a key view within the portion of the Conservation Area which overlaps with the RPG – specifically from the area around the Grade II* listed All Saint’s Church looking northwards. This view is illustrated at VP15 of the LVIA addendum. There would be no clear views of the Scheme from any other elements of the Conservation Area within anything which could be categorised as a key views.
- 3.21. VP15 demonstrates that there is distant visibility of the Scheme, however the viewpoint also demonstrates that this view is not pristine, and is cluttered with pylons and modern built form, including large, visually prominent modern buildings on the skyline. VP15 illustrates that there are no views of distant ‘spires’ or ‘towers’ on the Oxford skyline available any more in this particular view. There are no distinct or clear views of any spires below the skyline given the distance and modern built form existing now. It also illustrates that the Scheme lies at a much lower level and, most importantly, does not block, impede or in any way interrupt views across to Oxford city. The low-level height of the panel within the development means that although it appears on the valley floor, the elements of this view which contribute to significance – the views towards the Oxford skyline – will not be affected by the proposed Development. The ability to appreciate the wider valley landscape, which at present is composed of agricultural fields on the valley floor will experience a slight change with the Scheme in place which will cause a slight, temporary, reduction in what this view contributes to significance.
- 3.22. It is important to note that the key contributing factor to the Conservation Area, the physical fabric, the architectural and historic interest formed by the buildings and the open spaces between will not experience any harm from this Scheme. It is also noted that the primary component of the Conservation Area – the village core, will similarly, not experience any harm – a position accepted by Historic England and the Heritage Officer.
- 3.23. The only aspect of the Conservation Area which will experience any change is the view from the north of All Saints Church and the assessment of harm to the significance of the Conservation Area must take into account the asset as a whole, covering, as it does, a very large portion of land with numerous different character areas within it, including the planned estate village of Nuneham Courtenay. This change to the one key view is a temporary change, entirely reversible upon decommissioning of the Scheme. This view makes no particular contribution to the Conservation Area, beyond it being a key view of the RPG and as such, due to this overlapping factor, this change will result in a level **of less than substantial harm at the lower end of the scale** to the Conservation Area. This is **not significant**.
- 3.24. The decommissioning phase will comprise the removal of the majority of the Scheme visible from the overlapping elements of the Conservation Area and RPG from north of the Church of All Saints. Whilst this is beneficial, it will return the view from this asset to as it was prior to the Proposed Development and thus restore the baseline. Overall, this result in **no harm**.



- 3.25. As per the conclusions of the original ES, there are **no significant effects** arising from the proposed scheme with regards to heritage.

4. Nuneham Registered Park and Garden

- 4.1. The previous Heritage Addendum provided further information on this asset in response to consultation responses, however at that time of submission, access was not available into the RPG. Since this time, access has been arranged and a further visit by the author of this report has been carried out and further visual material prepared by the Landscape Team.
- 4.2. It was noted that in a number of consultation responses, the following images has been utilised as a demonstration of views from the RPG with the suggestion that the Scheme could be visible in such a view. The view was painted by Paul Sandby, who was a favoured artist of the Harcourts and painted a number of views of the estate. He was an acclaimed landscape painter who exhibited many of his paintings, including ones of Nuneham. The view is of a distant Oxford with Nuneham in the foreground. The spires of Oxford are illustrated at the bottom left of the picture. As far as possible, the Sandby view of c.1760 (the later 1775 engraving of the painting is below) has tried to be recreated in the authors photographs, however it will never be entirely reflective of the view given the extensive changes to the footprint of Nuneham which have taken place since this view was painted.



Plate 1 View of Nuneham Courtenay with distant view of Oxford engraving of Micheal Angelo Rooker after Paul Sandby 1775.



Plate 2 View of Nuneham replicating Paul Sandby image – proposed Scheme not visible in this view

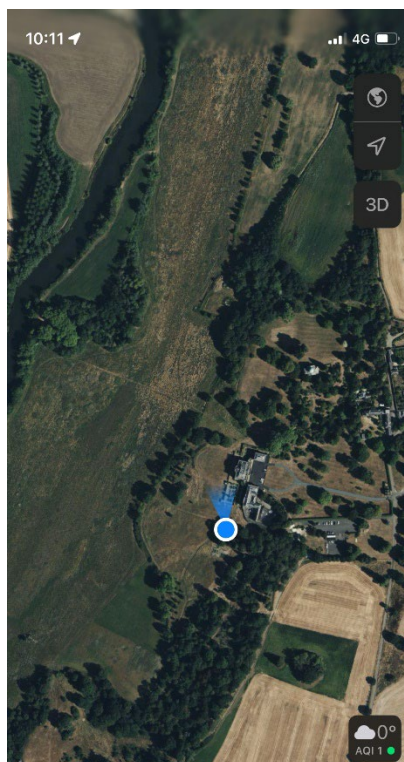


Plate 3 Location of viewpoint – looking north from a point south of Nuneham House

4.3. Whilst the Sandby image might suggest potential visibility of the Scheme in the sweeping river valley views, the modern view demonstrates the Scheme is not visible from this vantage point (and likely would not have been visible in the view contemporary with the Sandby image) – and the growth of vegetation on the sloping ground west of the house blocks views of the sweeping valley floor. It is noted that even if there were the possibility that the Scheme would have been theoretically visible in the Sandby image, it is highly

unlikely the view as represented by Sandby ever existed in that particular way at any time. The view is idealised, highlighting the Picturesque aspects of the Palladian villa and painted by an artist for his patron. It also appears to have been painted for public appreciation given the amount of times this image was recreated for engraving so the less wealthy could observe and marvel at these landscape creations of the upper classes.

- 4.4. Looking at the Sandby image – it is an impossible image that could never have been. The hills in the background are far too tall and prominent. The river, even without tree cover, would not be seen in that broad swathe of valley floor as represented and the house itself is seen at an angle which could not be possible unless the artist was slightly elevated – and it is possible/likely that Sandby was on some sort of scaffold tower when painting this. It therefore cannot be said that the Scheme would have been visible in this view as this is a view which could not have been readily appreciated, or indeed may never have existed in the way it is depicted.
- 4.5. The proposed Scheme will not appear within this view. Below are images taken during the recent site visit from the grassed area west of the house and present a nearly complete 360-degree view. The proposed Scheme will not be visible in any of the below views.



Plate 4 View north northeast – location of flower garden is at the very right of the image



Plate 5 View north – Thames is visible in this view marked with an arrow and appreciation of sweeping river valley – Scheme not visible



Plate 6 View northwest – sweeping river valley floor clearly visible and appreciable – key specimen trees visible in this view



Plate 7 View west southwest again the sweeping valley floor is clearly legible here. The reciprocal view back from the Thams was a view often painted of this landscape.



Plate 8 View south south west, Carfax Conduit visible marked with arrow – topography of parkland visible and clear sweeping view to the eyecatcher of Carfax along the edge of the bluff is important



Plate 9 View south



Plate 10 View of west elevation of Nuneham House

- 4.6. The key motivation for the siting of Nuneham and the selection of this site by the 1st Earl was because of the prominent position overlooking the Thames Valley. It is this quality that contributed to the Palladian principles which were the driving force of the Earl in his landscape aspirations (is the classically inspired Church of All Saints). It is this river valley context, the sweeping landscape sloping down from the house to the river, later shaped further by Lancelot Brown, and the views from the Thames looking up at the house and parkland which are the most significant contributing elements to the understanding of the wider Registered Park and Garden. The majority of views of Nuneham are from the Thames. J. W. M Turner painted the Nuneham landscape – painting the view from the Thames looking southeast towards the house.



Plate 11 J. M. W Turner View of Nuneham Courtenay from the Thames 1787 (www.tate.org.uk)

- 4.7. There are no views that have been created from the Thames looking towards Nuneham which would contain the proposed Scheme. The location of the Site is such that the scheme would not cause any harm or change whatsoever in the views towards the Thames and from the Thames back, nor would the Scheme cause any reduction at all in the ability to understand the key contributing factor of this river location as the reason this house is in this location.
- 4.8. The key elements of the parkland which contribute to significance are:
- Flower Garden commenced by the 1st Earl but revolutionised by the 2nd Earl and William Mason, painted by Sandby in 1777;
 - Topography, creating the bluff overlooking the river valley creating the ideal location for a Palladian villa with extensive views from the house and expressive views from the river back to the house;

- Key structural elements: Nuneham House; Carfax Conduit and All Saints Church;
- Walks and landscaping created by Lancelot Brown for the 2nd Earl still legible within the landscape (Brown's Walk for example to Whitehead's Oak)
- Vantage points, illustrated by numerous painters and described by a number of antiquarian walking guides within the boundaries from which to observe the river valley, and the distant settlements of Abingdon and Oxford.

4.9. It has been set out in detail in the ES Chapter, the Heritage Addendum and illustrated with further information within this report that the key elements of the significance of this asset will not be harmed by the proposed Scheme. The bulk of historic visual material shows views of the estate and Nuneham House which the Scheme will not affect at all.

4.10. Therefore, the Pegasus conclusion of **less than substantial harm at the lower end** of the scale stands, a position supported by Historic England and the Heritage Officer

Carfax Conduit – Grade I listed Structure and Scheduled Monument (1193569, 1020965)

4.11. Consultation responses from Historic England and the Heritage Officer made specific reference to Carfax Conduit, a Grade I listed asset located within the parkland as a deliberate eye-catcher in views from the house, over a valley and from which reciprocal views of the house can be seen. They requested additional material to be able to assess potential visibility of the proposals from this asset and to allow a robust assessment to be considered.

4.12. The monument of Carfax Conduit is one of the key architectural set-pieces within the wider designed landscape and serves as a visual indicator of the difference in landscape design aesthetics, fashions and tastes between the 1st Earl and his son, the 2nd Earl with the 1st Earl being a proponent of classical landscapes, formal designs illustrated by All Saints Church, formal clearings and aligned vistas evocative of an Italianate scene. This is in contrast to the 2nd Earl who brought in Lancelot Brown to create a romantic landscape, sweeping lawns, lush meadows, woodlands creating views of distant spires – creating an idealised English picture. Prior to the gift of Carfax, the 2nd Earl wanted a ruin to be an eyecatcher and was going to build from scratch a Gothic ruin to be called Courtenay Castle which would serve as a remnant of a landscape that never was. Instead, when Carfax Conduit was gifted by the City of Oxford this solved the problem and provided an equally picturesque Gothic eye-catcher to be located across the valley from Nuneham House to the southwest, viewed against a backdrop of the ancient oaks of Lock Wood. Courtenay Castle was abandoned and Carfax Conduit was set in its place.

4.13. The monument was intended to be viewed from Brown's Walk, a looping path named after Lancelot Brown, in woodland directly south of the House which loops to the edge of the valley where an oak named after the poet in residence to the Harcourts, William Whitehead, was situated from which views of the conduit were prominent. This oak is still present and this view was one much admired by visitors – as illustrated at plates 13 and 14 below which show the original image and an approximate modern view.

4.14. A detailed description was given of this asset in the Heritage Technical Baseline (April 2024) prepared by Pegasus to support the application at paragraphs 6.57 – 6.66, however

at this point, with a lack of visibility of the Scheme, the asset was not considered further within the ES Chapter.

- 4.15. In order to address the comments made by Historic England and the Heritage Officer, the significance and contribution made by setting will be set out again here.
- 4.16. The significance of this asset is formed primarily by its built fabric which displays its architectural, artistic and historic interest. This asset has clear architectural interest as a surviving 17th-century conduit house with elaborate decoration, closely associated with the city of Oxford. This is augmented then by the removal of it and its placement within the landscape as an eyecatcher. These elements also contribute to its historic interest which is multi-layered. Firstly, there is the inherent interest in the survival of a monumental piece of 17th-century municipal sculpture. This asset had a functional, practical purpose as a conduit house and helped to provide clean water to the people of Oxford, however the level of decoration was far greater than required, indicating the status of the city. In addition, the purchase and reuse of this as a key feature of the Nuneham designed landscape adds another layer to the historic interest. The artistic interest of the asset is self-evident and recognised by Lord Harcourt as a suitable substitute for the planned Courtenay Castle within his estate.
- 4.17. The setting of this asset contributes to significance, though this contribution is clearly less than that made by the physical fabric. The elements of the setting which make a positive contribution are set out below in the order in which they contribute the most:
- The designed parkland of the Nuneham Estate in the Brown phase – this asset was placed in this specific location as an eyecatcher – something to be seen from a distance from Nuneham House and with reciprocal views back. It is also from this parkland that the architectural interest of the asset can be best appreciated – specifically the view across the valley to the north, from Whitehead’s Oak, and then from locations slightly southeast of the asset which allows a view of the asset with the river valley below;
 - The valley of the river Thames – this asset was placed here deliberately to have views across and along the valley;
 - The city of Oxford – for which this asset once helped to provide clean water.
- 4.18. This asset is located on the western edge of the registered park boundary of Nuneham. There are few publicly available locations outside the park boundary from where this asset can be seen in detail. The only clear views of the asset are from within the boundary of the parkland – specifically from Whitehead’s Oak, from the west of Nuneham House and from the area directly adjacent to the monument to its southeast (see plate 13 below for historic version of this view).
- 4.19. The views from this asset are panoramic – but are much more limited in the arc from east – south-southwest where the ground level rises and there are woodlands blocking the views. The views are focussed west, northwest and north but it is noted that long-distance views northwest and north are limited and in summer, very limited by vegetation. The views west are panoramic and long-distance.
- 4.20. There are no views of this asset from within the Site boundary – nor would the Site form a back drop to any views of the asset from other key locations within the estate boundary.

- 4.21. The recent Site visit facilitated the request for further visual material and a Heritage specific photomontage has been produced from this asset (see Appendix 1) from a location standing just adjacent to the asset. This shows that there is the barest of glimpses of the proposed scheme through winter vegetation – not even enough to be legible to the naked eye. It is essentially imperceptible. This glimpse is indistinct and in summer months as well as in spring and autumn vegetation, there will be no visibility.
- 4.22. Therefore, it is not considered that this glimpse, that is not distinct is not of a level to cause any level of adverse effect and therefore **no harm** at all to the significance of this asset.

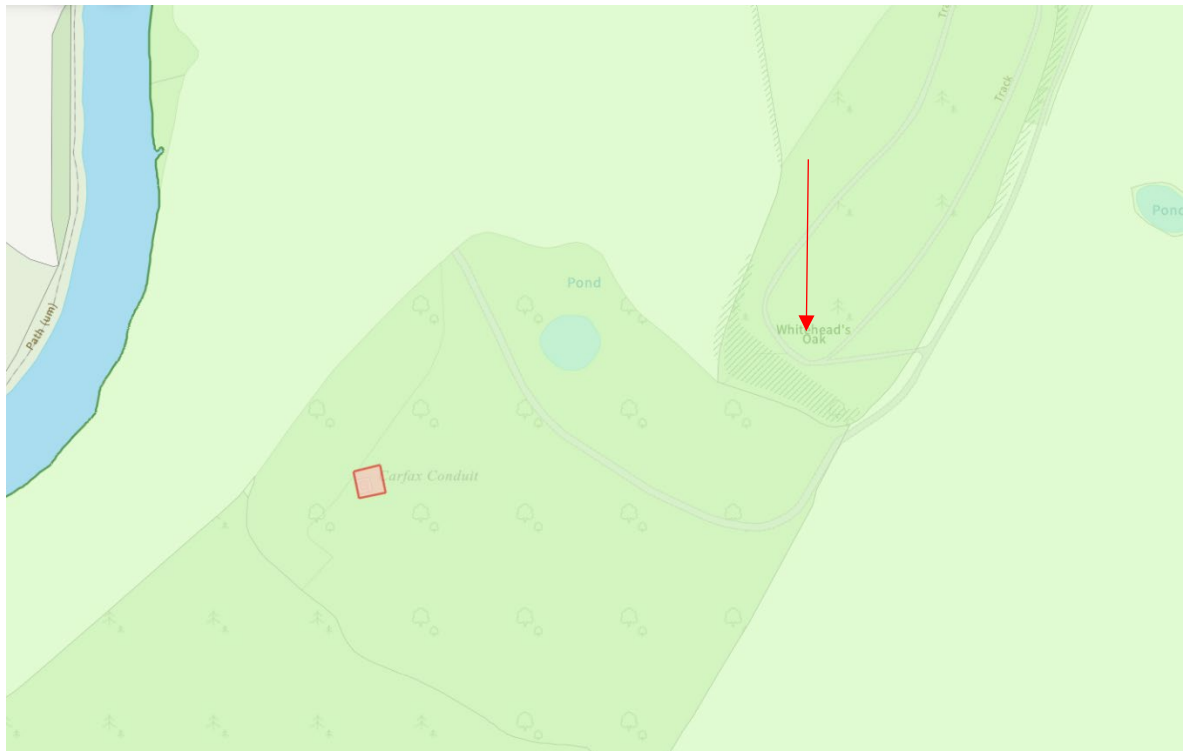


Plate 12 Location of viewpoint near Whiteheads Oak



Plate 13 Proximate modern view of Faringdon View of Carfax and Abingdon from Whiteheads Oak (Carfax Conduit) indicated with arrow (site not visible) looking southwest from Brown's Walk



Plate 14 Aquatint by Joseph Constantine Sadler after an original by Joseph Farington within the 1794 J. Boydell *An History of the River Thames Vol I. 1794* of View of Carfax and Abingdon from Whitehead's Oak



Plate 15 Nuneham Park Carfax Conduit with deer and view of house c. 1770



Plate 16 Carfax Conduit

Response to Specific Consultation Comments

- 4.23. Historic England agree with Pegasus assessment of less than substantial harm at the lower end of the scale for this asset – Nuneham RPG.
- 4.24. Historic England asked for visualisations from Carfax (provided) including cumulative with the Ninevah Farm (South Oxfordshire Solar Farm) scheme. That scheme is not visible in this view – this was confirmed within the documentation provided in support of that application (Ref: P20/S4360_FUL) in the South Oxfordshire Solar Farm Environmental Statement Chapter 7: Cultural Heritage Addendum of July 2021. Within this they carried out further visualisations which demonstrated there would be no visibility of that scheme from the location of Carfax Conduit, reducing the level of effect as set out in their original ES as Minor Impact to No Effect as a result.
- 4.25. It is welcomed that the Gardens Trust in their response of 5th November 2024 recognise that there are other important views which contributes to the significance of the landscaped park however, they go on to state:



“However, it is perfectly legitimate to emphasise the importance of the particular view northwards from All Saints precisely because this is the view that will be compromised by the proposed solar farm.”

- 4.26. Pegasus take some issue with this statement. The importance of this view has not been under-emphasised in any of the assessments. The contribution this view makes to the significance of the parkland (and church) has been clearly set out and assessed in accordance with guidance and policy. It is accepted this is an important view – hence why harm has been identified to the asset as a whole as a result of this importance. If this view were of lesser importance, a finding of harm may not have occurred at all. However, it is also important to recognise that the significance of the asset – both church and RPG does not rest solely within this view and thus any changes within that view, though harmful, as accepted, would not approach a level where the significance of these assets could no longer be appreciated and to continue to assert this is not sustainable.

5. Grade II* Church of All Saints

- 5.1. Any of the comments made regarding this asset reflect previous comments made. As such, this section offers a further commentary on the asset to provide justification for the Pegasus conclusions but also adds additional commentary on Viewpoint 15, the photomontage taken from in front (north) of the church. Previously, consultees had commented that the image of VP15 presented in the original documentation was slightly hazy. As a result of this, new photography was collected recently to prepare a new VP15 image which is presented within the LVIA. The new visualisations were also required to add in the cumulative Ninevah Farm scheme as per consultee requests.
- 5.2. As stated in the previous Heritage Response, Paul Sandby painted three known images of the Church, one of which, the Surprise View of the New Church was reproduced as an engraving (see below). The other two images are *The Church in the Landscape* which shows a view looking southeast from the lower grass slopes which fall away from the northern elevation of the Church and its portico; and then a view *The Church Porch as a garden ornament* which shows a view only of the classical porch in a clearing when viewed from the house which divorce this element from the church and makes it appear similar to the Temple of Flora in the flower garden, as a standalone garden ornament. These two views were never reproduced as engravings – that is these images were never for the mass-market.
- 5.3. None of these views show the view to Oxford from the north portico. There are no known images by Sandby or any other painter of this landscape and of the view north from the north portico. The view north from the church, whilst not disputing that that was the reason for the siting of the church and it was an admired view, was clearly not of the scope or grandeur to inspire Sandby or any of the later painters and recorders of this landscape of similar renown to make a record of.
- 5.4. It is also the case that whilst this building was located in this spot in 1763–64 to enjoy the sweeping view to the skyline of Oxford, given the fact that there are no known contemporary images of the views from this location, it is difficult to know what this view actually looked like – in that the width or ‘openness’ of the view is difficult to gauge. It is the case that the view that exists today is quite limited and does not look directly towards the centre of Oxford, or towards the skyline of spires (not that these are distinct in the modern view in any case). It is considered that since 1764, the growth of new, self-seeded or deliberately planted trees and the maturation of the vegetation of the parkland have served to narrow the view from this aspect and the view that remains today, cannot be said to be comparable to the view of 1764 – the intended view – as we have no comparison.
- 5.5. It is also the case that modern influences have compromised this view. In the 1970 publication *Nuneham Courtenay, Oxfordshire: A short history and description of the house, garden and estate*, the author Mavis Batey, one of the foremost experts on this landscape, noted, when describing the view from the church:
- “The highlight of the Earl’s planned vistas at this point was the skyline of Oxford’s towers and domes, now unfortunately obscured by trees and pylons.”***
- 5.6. Even in the 1970s, the view intended by the Earl was obscured. Again, this is not to say the view that exists is not still an important contributing factor to the significance of asset and the parkland, and that the Scheme will not be harmful, to a less than substantial degree at

the low end of the scale – but it is to note that the view is not the same as it was originally and thus the change within that view arising from the scheme (for a temporary period) is another note within this ever changing landscape.

- 5.7. It is noted that the ‘Surprise’ view below is taken from the terrace walk leading north from the church. It is when traversing this walk south, that the church suddenly appears – hence the surprise – and it is likely that these sorts of views, and the Sandby views of the porch glimpsed through trees and the views of the church from the sweeping grounds to its immediate north, are those to which Horace Walpole was referring to when he described the church as *‘the church is become a temple and principal feature in one of the most beautiful landscapes in the world’*.
- 5.8. The proposed Scheme, therefore, will not appear in the same view as any of the historic images of this asset.



Plate 17 View of the New Church at Nuneham in Oxfordshire – Engraving by James Fittler after Paul Sandby 1778



Plate 18 *The Church in the Landscape*

- 5.9. As requested by consultees, Photomontage 15 has been retaken to obtain a clearer image – though it is noted that the distance of Oxford at over 8.3km northwest, air pollution and the natural haze means that the views towards the city from this location will struggle to be pin-sharp.
- 5.10. It is noted that the new image of VP15 is slightly different to the previous images. This is due to the fact the photographer has moved forward slightly compared to the previous version (and hence the photo is taken at a slightly lower elevation on the grass slope) and left slightly. Together with the inherent variances in cameras/lenses/GPS coords coupled with the additional tree growth of trees in the middle-ground, this has obscured a greater extent of the open field next to the solar farm resulting in the panels appearing slightly closer. The vegetation in the middle-ground of the view has grown significantly, blocking elements of the view which had previously been more open. This is demonstrated by the images below which compare the images from Rev C of VP15 compared to Rev D – the version submitted with this package of information.
- 5.11. VP15 continues to illustrate the elements of the Scheme – that it the Scheme will lie along the valley floor and will not intrude into the vertical plain/axis of the view from this elevated position. VP15 also illustrates that the view at present, though extensive, is not of the classic ‘dreaming spires’ skyline of Oxford. The view is much more narrow, and slightly to the east of the centre of Oxford, with the view towards where Oxford itself would be located obscured by vegetation. The skyline shown in this image dominated by modern build form and in particular at present, the numerous cranes erecting new buildings at the Oxford Science Park.
- 5.12. It is also the case that the variation between the old and new VP15s is a demonstration of how swiftly this landscape is changing in terms of vegetation growth. The growth of the new vegetation in the middle-ground which has blocked some of the fields previously

visible is also on the left of the image, the angle of the view which is towards Oxford. The growth of this vegetation has, therefore further obscured the views towards this area, which was the original focus of view when the church was built. It has narrowed the view available, however the key elements remain legible – the valley floor and the extent of the view, elements not affected by the Scheme. The views towards Oxford are obscured but these are not obscured by the Scheme – rather they are obscured by the planting within the parkland.

- 5.13. VP15 confirms the original Pegasus assessment of **less than substantial harm at the low end of the scale** for this asset.
- 5.14. Historic England agree with the Pegasus conclusion of less than substantial harm at the low to lower end of the scale and the Heritage Officer agrees with the position of less than substantial harm.



Plate 19 Zoomed in view of VP15 RevC – previous version. Note the circle is around the area of fields which are later obscured by the growth of vegetation within the parkland boundary. The arrow is pointing at a distinctive tree with bronze foliage which is located in the RevD image below to orientate the viewer.



Plate 20 –VP15 RevD version. The circle is in the same location in both images with the arrow pointing to the distinctive bronze-leaved tree. As can be seen, the tree growth around the parkland has grown extensively since the original images were taken in 2022 which has result in some of the fields west of the Scheme now being slightly obscured – this is simply evidence of how much the view within and out of this parkland is change in even in relatively short periods of time.

6. Archaeology

- 6.1. As per the previous response, the recent response from the Oxfordshire County Archaeologist of 6th November 2024 maintains their objection to the Scheme. The Historic England response of 12th December 2024 also references archaeology but primarily in relation to the grid connection portion which is located within the boundary of the Scheduled Monument and matters relating to requirements for pre-application advice and Scheduled Monument Consent (SMC).
- 6.2. Pegasus are aware that any works connected with the proposed Grid connection would require, at the very least, discussion with Historic England to determine whether intrusive archaeological works would be required to evaluate the area, requiring SMC then further works during construction which would require a further round of SMC. Pegasus are also aware that these applications for SMC would need to be accompanied by documents detailing the justification for the works, WSI(s) for any intrusive fieldwork required, the results of this to be analysed and discussed, before applying for the SMC for the works themselves. At present, there is no detail in terms of the construction methodology for the grid connection and therefore requirements for SMC, archaeology etc are similarly uncertain.
- 6.3. In their consultation response, the Oxfordshire Archaeologist stated they would be supportive of an extension of the already proposed no-dig approach, which is located in the northern area of the scheme, further north, to the northern Site boundary to cover the area of archaeology identified during the evaluation. Appendix 2 is a figure showing the area of existing no-dig and the proposed extension to this area as shaded beige on the plan. This shows the entire area of panels within the northern portion of the Site, access tracks and cable runs being part of a 'no-dig' solution. The sub-station will be operated by a third-party (DNO) and as such, the parameters of this structure, including construction methodology and foundation design are dictated by them and are not under the control of the applicant. As such, and at present, the sub-station requires foundations of around 600mm, however discussions are ongoing to understand what can be achieved here.

7. Cumulative

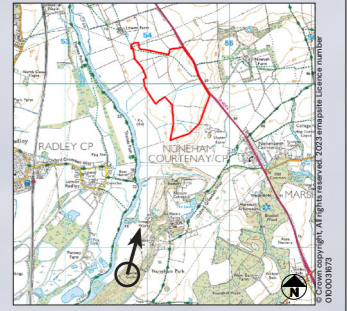
- 7.1. The updated photography to produce an updated VP15 also included the Ninevah Farm scheme (P20/S4360/FUL) in order to understand both of these schemes together. It is the case that the Ninevah Farm scheme has been consented and was considered within the original ES Chapter at section 8.8.
- 7.2. VP15 shows, as did the visualisations prepared to support the Ninevah Farm application, that both schemes will be partially visible in this view. However, the Ninevah Farm scheme is located to the east and only slightly encroaches into the view. For that application, they identified a slight reduction in significance of All Saints Church from the scheme which they assessed as being of Negligible Significance.
- 7.3. For the Conservation Area and RPG, the Ninevah Scheme identified a minor loss of significance to these assets which were considered to be of minor significance and temporary.
- 7.4. Cumulative effects (including those from the Ninevah Scheme) have already been assessed in the ES Chapter at paragraphs 8.8.5 and 8.8.6. this identified that the two schemes in combination would not result in increase in the level of harm already identified to the relevant assets. For the Church of All Saints, that was **less than substantial at the low end of the scale**, for the RPG, that was **less than substantial at the lower end of the scale**. There would be no increase in the level of effect assessed for the Conservation Area in this Addendum - **less than substantial at the lower end of the scale**.
- 7.5. As stated above, with regards to Carfax Conduit, issues of cumulative effects with the Ninevah Farm scheme is not an issue as the documentation provided in support of that application (Ref: P20/S4360_FUL) in the South Oxfordshire Solar Farm Environmental Statement Chapter 7: Cultural Heritage Addendum of July 2021 demonstrated there would be no visibility of that scheme from the location of Carfax Conduit. As this Scheme will also not produce any visibility of the Scheme which is perceptible, there would be no cumulative effect.

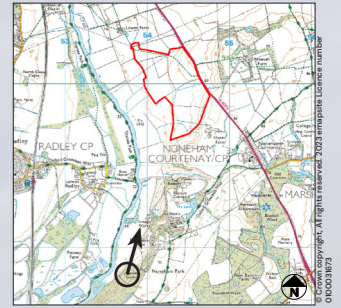
8. Conclusions

- 8.1. This Further Heritage Addendum has addressed additional consultation comments received on this application. It has also addressed an error identified in terms of land ownership of the Nuneham Estate, concluding that this error has no effect on the conclusions of the Heritage ES Chapter which still stand.
- 8.2. The Further Addendum has also carried out a further assessment of the Nuneham Courtenay Conservation Area, accepting that as the Conservation overlaps with the RPG boundary, as there is harm to this asset. However, it is noted that this is **not a significant effect**.
- 8.3. It is also noted that Historic England and the Heritage Officer were both in agreement with the Pegasus conclusions that the historic core of the Conservation Area, the planned 18th-century estate village of Nuneham Courtenay, would not experience any harm from the proposed Scheme. Thus, it is the case that the conclusion of less than substantial at the lower end is correct when taking into account the Conservation Area as a whole. It is one particular view within the whole expanse of the Conservation Area which would experience temporary harm, as the proposed development is reversible.
- 8.4. All other conclusions made by Pegasus Group remain as set out within the ES Chapter. It is noted that Historic England and the Heritage Officer agree with the conclusions of Pegasus with regards to the level of harm to the Church of All Saints grade II* listed building and the grade I Nuneham RPG – **less than substantial at the lower ends of the scale**.



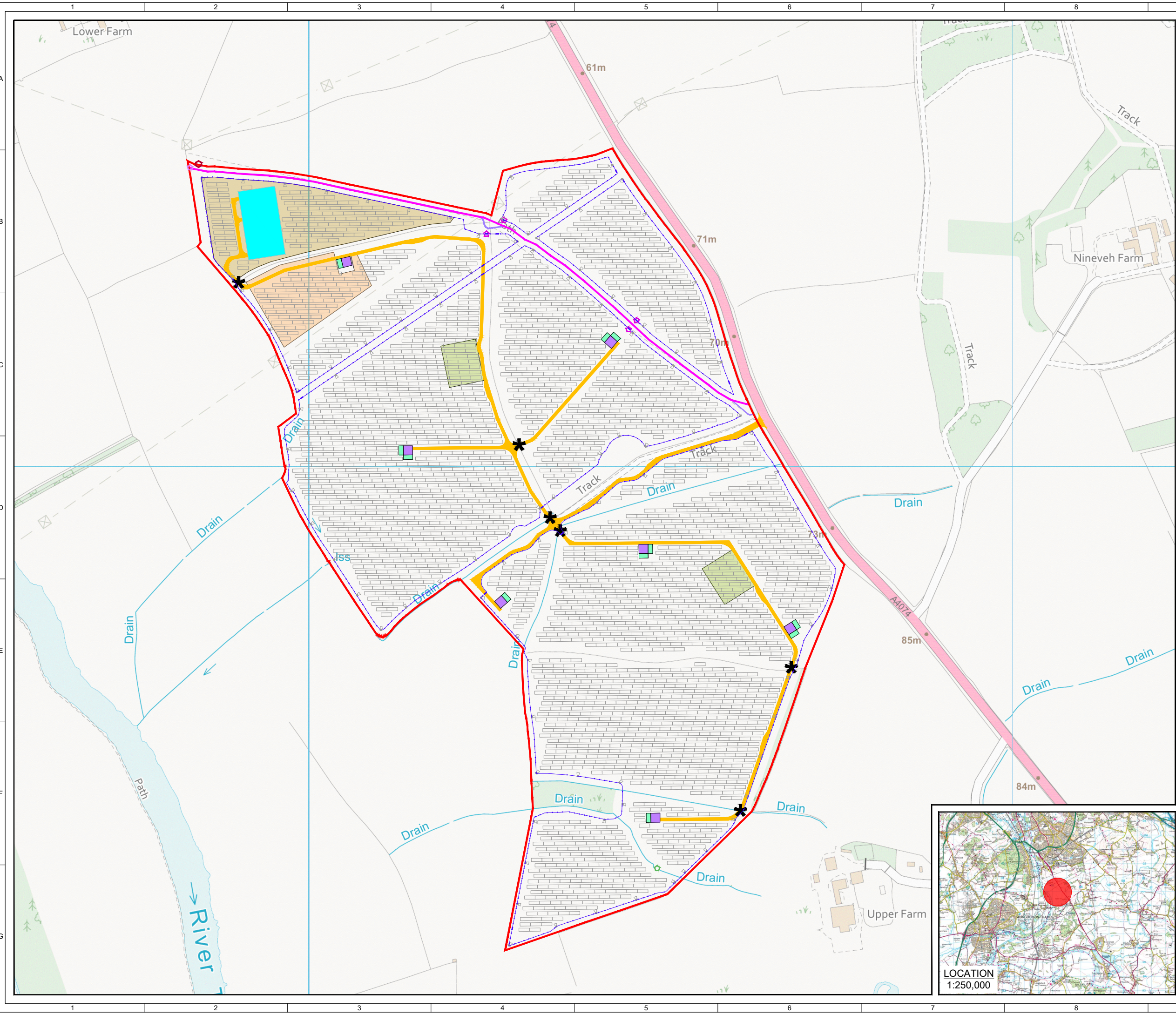
Appendix 1 – Heritage Photomontage





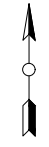


Appendix 2 – ‘No-dig’ areas



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- KEY:**
- PLANNING BOUNDARY
(OUTSIDE EDGE OF LINE DENOTES BOUNDARY)
 - PROPOSED ACCESS TRACK
 - PUBLIC RIGHT OF WAY DEFINITIVE MAP (PRoW)
 - PERMISSIVE PATH
 - INDICATIVE SOLAR PV ARRAY
 - INVERTER
 - INVERTER HARDSTAND
 - SUBSTATION COMPOUND
 - TEMPORARY CONSTRUCTION COMPOUND
 - FENCE LINE
 - GATE (FENCE)
 - * WATERCOURSE CROSSING
 - EXISTING HEDGEROW GAP TO BE ENLARGED
 - PRoW CROSSING POINT
 - UPDATED PRoW ACCESS
 - INDICATIVE HERITAGE INTERPRETATION BOARD
 - ◀ CCTV
 - INITIAL NO-DIG AREA (3.14ac)
 - EXTENDED NO-DIG AREA (6.65ac)



ISSUE	DRAWN	CHKD	APPD	DATE	REVISION NOTES
5.1	JB				Entrance & public right of way updated.
5	FG	BD	EB	11/03/2024	Minor amendments (Indicative heritage added, key update)
4	FG	JM	BD	04/03/2024	Minor amendments (OHL constraint buffer update)
3	FG	JM	BD	18/01/2024	Drawing title, planning boundary and PoC update

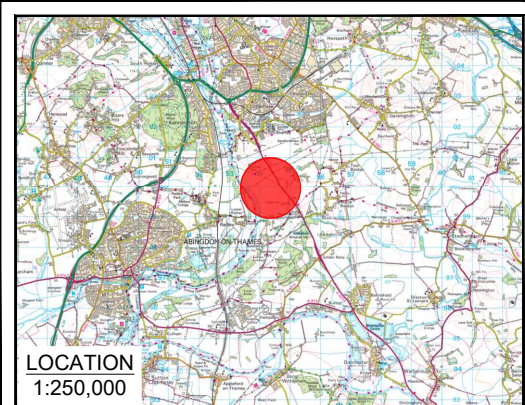
PURPOSE		COORDINATES	
PERMITTING		OSGB 1936	
SCALE		DATUM	
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LAYOUT DRAWING		T-LAYOUT NO	
N/A		N/A	

PROJECT TITLE
NUNEHAM SOLAR FARM

DRAWING TITLE
FIGURE 4 PLANNING INFRASTRUCTURE LAYOUT

RES DRAWING NUMBER	REV
04531-RES-LAY-DR-PT-003	5.1

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