

BOURNEMOUTH, DORSET AND POOLE
Examination of the Minerals Sites Plan 2018
SESSION 20

Preamble

I am Simon Nicholas COLLCUTT *MA(Hons) DEA DPhil FSA*, a professional assessor, instructed since September 2015 by the local group, Frome Residents Against Mineral Extraction (“FRAME”), to report upon all historic environment and cultural heritage issues (the fabric and setting of built features, archaeological features, historic landscapes & gardens, etc.) arising in the context of the MSP, specifically in relation to the Cluster 4 (Moreton Area) Sites: AS-19 Woodsford Extension, AS-25 Station Road and AS-26 Hurst Farm.

I would respectfully draw the Inspector’s attention to two main sets of documents: “Proposed Minerals Allocations AS19, AS25 & AS26, Moreton Area, Dorset, Historic Environment Appraisal”, October 2015 [MSPEXT - 07]; and the three related submissions, one for each of the Cluster 4 Sites, “Mineral Sites Plan Pre-Submission Draft – FRAME – Cultural Heritage”, January 2018 [PSD - MSP369 to 371].

(C) AS-25: Station Road, Moreton; Question 147

The Site Assessment gives C9-historic landscape a range of Categories B-D, C10-historic buildings a Category D and C11-archaeology a range of Categories A-D. However, the SA identifies an “? uncertain” impact for C9-historic landscape, a similarly uncertain impact (with both the “no impact” and “very strong negative impact” symbols used) for C10-historic buildings and an “? uncertain” impact for C11-archaeology. There is no explanation of the differences between the two documents. Ranges of impacts have been identified by the County’s professional officers because there has not been sufficient assessment to narrow the possibilities. In their report on this site [MSDCC – 41], Context One explicitly state that EH AN3 ¹ Step 1 (identifying which heritage assets are affected by the potential site allocation) had been completed before their instruction and that their work was aimed principally at EH AN3 Step 2 (understanding what contribution the Site (in its current form) makes to the significance of the heritage asset(s)), with only brief consideration of elements of later Steps where possible; in the case of AS-25, the Context One work did not include simple or cumulative impact assessment (Step 3) or consideration of the feasibility of mitigation. Context One do state rather obliquely that “the appropriateness of the boundaries of extraction areas” remains to be assessed (paragraph 7.6), a proposition

¹ Historic England 2015. Advice Note 3 - The Historic Environment and Site Allocations in Local Plans.

supported by the comment in the Site Assessment that preservation (*in situ*) may be required.

The present author has submitted detailed analysis of the cultural heritage interests in AS-25 in [MSPEXT - 07] and [PSD - MSP370]. It is asserted that there would be numerous negative impacts under C9, C10 and C11 which have not been identified at all in the MPA assessments (cf. the present author's Statement below with respect to Question 151); obviously, the mitigation of such impacts has not been addressed.

By its own account, the MPA does not know whether negative impacts of unassessed and inadequately assessed (but potentially high) severity can be adequately mitigated. It is respectfully submitted that the complete absence of analysis of impacts upon cultural heritage interests, and thus of the feasibility of mitigation, in the proposed MSP and its supporting documents lacks positive preparation, is unjustified and is inconsistent with national policy, rendering the proposed MSP unsound in respect of the subject of Question 147.

(C) AS-25: Station Road, Moreton; Question 149

The Site Assessment and SA in respect of cultural heritage interest affected by AS-25 are wholly inadequate, with regard to scope, standards and simple common sense. For instance, it is stated that a very large hole in the ground will have only temporary impact upon archaeological interests, whilst no relevant historic buildings looking towards the Site (or which have historic association with the Site) are mentioned at all.

Cultural heritage assessment concerning the potential effects of AS-25 may be found in [MSPEXT - 07] and [PSD - MSP370]; in order to avoid repetition, further details relevant here may be found below under the present author's response to Question 151.

It is material to note here that the Site Assessment and SA claim to date from November 2017. The opinion of the Purbeck District Council Design & Conservation Officer was requested by the MPA and that opinion was provided in June 2017. After the present author indicated that he was about to submit an FOI request to be allowed to see this opinion, a text was finally issued in the public domain (cf. [MSPEXT – 05]), with a most surprising rider, distancing both the District and the MPA from the opinion of their professional officer; the Inspector is respectfully requested to treat this rider with the levity it deserves. The Conservation Officer's opinion (which in general was that "harm could not be mitigated" and that, even if the eastern two-thirds of the Site allocation were removed, as he recommended, some noise and visual intrusion would still occur) was not even mentioned in the Site Assessment and AS. It may be noted that, with respect to the western third, the Conservation Officer does not appear yet to have assessed the heritage significance of Moreford Hall or the impact on the designed views from the Obelisk, nor does he mention the remaining archaeological potential (the Palaeolithic interest being strongest to the southwest of AS-25).

It is respectfully submitted that the complete absence of analysis of impacts (simple or cumulative) upon the cultural heritage interest affected by AS-25 in the proposed MSP and its supporting documents lacks positive preparation, is unjustified and is inconsistent with

national policy, rendering the proposed MSP unsound in respect of the subject of Question 149.

(C) AS-25: Station Road, Moreton; Question 151

In their report on this site [MSDCC – 41], Context One explicitly state that EH AN3² Step 1 (identifying which heritage assets are affected by the potential site allocation) had been completed before their instruction and that their work was aimed principally at EH AN3 Step 2 (understanding what contribution the Site (in its current form) makes to the significance of the heritage asset(s)), with only brief consideration of elements of later Steps where possible; in the case of AS-21, the Context One work did not include simple or cumulative impact assessment (Step 3) or consideration of the feasibility of mitigation.

The Context One report has been expressly constrained as to scope (assets to be included) by the MPA. The Context One report does not reference any cultural heritage assessment external to the County Council (i.e. the results of previous consultations are ignored, including the opinion of the District Conservation Officer). In any case, the Context One report does not deal with impact assessment and does not cover the subject of setting. Context One misidentify the mineral involved, recognising only Tertiary geology (Poole Formation) on the Site. The Context One work has not even included a basic (public domain access) site visit, let alone a proper Site walkover. The Context One report is not fit for purpose.

The report [MSPEXT - 07] contains references to a series of critical issues (such as the possibility of archaeological remains within the actual mineral body (including Palaeolithic remains which would be part of what the British Museum has called a regional “super-site”³), the setting of Listed Buildings (e.g. the Obelisk with its designed views over AS-25) and of non-designated assets of high quality (e.g. “positive” buildings in the Conservation Area, or Moreford Hall with its Frampton Family and RAF associations), the severing of the historic Hurst Farmhouse and its Barns from their associated land or cumulative cultural heritage effects) which have either not been touched upon at all in any MPA document or which have not been assessed by the MPA and its consultants according to professional standards appropriate and proportional in the Plan-Making context. Context One do not mention any Thomas Hardy connection in this, the “*Valley of the Great Dairies*”⁴, nor do they mention the paintings of the Moreton area by Hardy’s friends, Frederick Whitehead and Henry Moule. Another of Hardy’s friends was T. E. Lawrence; Context One note that the Grade II Listed grave of T. E. Lawrence lies “a further 250 m or so to the east of the research buffer”, confirming that they have not assessed what contributes to the significance of this asset (such as the calm approach along the Avenue (Station Road)).

² Historic England 2015. Advice Note 3 - The Historic Environment and Site Allocations in Local Plans.

³ An archaeological site which clearly falls within the ambit of paragraph 139 of the NPPF.

⁴ This part of the Frome is Thomas Hardy’s “Valley of the Great Dairies”, recognised as one of the heritage opportunities underpinning the proposal for a Dorset National Park to include this area (see Dorset National Park - Short Case Study Series: 3. Thomas Hardy & the Proposed Dorset National Park (2018), a copy of which is appended to Mr. Wickenden’s Statement concerning Question 57).

In February 2018, the MPA provided a copy of a report by The Historic Environment Consultancy, entitled “Review of the Impact on the Historic Environment from Proposed Gravel Extraction, Moreton, Dorset (Version 2, 30 January 2018)” [MSPEXT – 03], compiled at the instruction of the Moreton Estate. Whilst the actual assessments of the assets affected, their significance, the likely impacts of the mineral allocations (as simple and cumulative effects) and the possibility of mitigation are certainly not agreed, it is of interest that the Review contains viewshed analyses from some assets, developed from a LiDAR-based digital surface model (e.g. in [MSPEXT – 03], figs. 11 and 12 show viewsheds for the ground floor and first floor respectively, calculated from the closest Listed Buildings). The present author has requested the date(s) of the LiDAR survey but (as of 16/08/2018) The Historic Environment Consultancy have replied that the dating is unknown to them. The viewer must therefore rely upon information intrinsic to the viewshed plots. Looking at plots for individual assets, particularly those which are quite close to the Site (e.g. Daisy Cottage, Woodleigh), one can see how marked was the effect of vegetated boundaries on the viewsheds shown, such that one must conclude that the vegetation was largely in leaf at the time of the survey. Thus, even though we do not have the date(s) of the survey, it can still be seen that the extent of the viewsheds plotted is towards an annual (seasonal) minimum, a significantly wider extent probably being relevant in the deeper (leafless) ‘winter’ in this dominantly deciduous landscape. Furthermore, the nature of the model is that it uses the existing ground surface; once that surface is changed out of an approximately horizontal plane (either by deep excavation or by bunding or stocking, or indeed by buildings or larger/taller machinery), the visibility of the mineral workings would automatically increase most significantly.

It is respectfully submitted that the potential impacts on the significance of all heritage assets cannot, by express *a priori* design, have been adequately addressed by Context One, such that the proposed MSP, with its supporting documents, continues to lack positive preparation, is unjustified and is inconsistent with national policy, rendering the proposed MSP unsound in respect of the subject of Question 151.

(C) AS-25: Station Road, Moreton; Question 152

The Site Assessment and the SA make no attempt whatsoever to assess the heritage significance of the Conservation Area (a designated heritage asset in its own right), such that the MPA cannot by definition be in a position to understand the likely level of harm, even less the likely need for mitigation – hence the proposition: “If the impacts cannot be mitigated satisfactorily the site will not be developed”. Even the Context One report [MSDCC – 41] deals with the CA in a couple of sentences. It is puzzling that there are four documents (Reviews and Audits) issued by the proposer of AS-25 in the Examination Library but there is no copy of the October 2015 Moreton Conservation Area Appraisal.

The report [MSPEXT – 07] contains an appraisal of the significance of the Conservation Area, its contained Listed Buildings and “positive” buildings and its setting, together with suggestions as to the likely negative impacts; the District Conservation Officer is broadly in agreement in [MSPEXT – 05]. The likely cultural heritage impact of mineral working within AS-25 could not be adequately mitigated.

Take the Avenue (Station Road), with its flanking trees and stream, as an example of character – what the Conservation Area Appraisal calls: “historically ‘Fore Street’, and the public face of the village”. The merits of this atmospheric approach to Moreton have been asserted in both professional assessments and many representations from the local residents. In [MSPEXT – 07], the present author drew a comparison between this Moreton approach in its current state and the condition of the Redbridge Lane/Road (illustrated by photographs), flanked by its quarry, which, it is understood, is in the same landholding as AS-25. Is it reasonable to think that the Avenue at Moreton could suffer a similar fate? After a local challenge, on 16 March 2017, the Dorset County Council Regulatory Committee found, upon officers’ advice, that works at Redbridge Road Quarry were “considered to be progressing generally in accordance with extant planning permissions” (published Committee Minutes, referring to a 2015 permission and 2015 & 2016 ROMP Conditions)⁵. It is indeed reasonable to think that the Avenue at Moreton could suffer a similar fate.

Dr. S. N. Collcutt for FRAME (04/09/2018)

⁵ Incidentally, Redbridge Quarry sits on top of (is very probably cutting into) the actual regional “super-site” recognised by the British Museum, yet there are no Conditions governing mitigation of the impact on Palaeolithic archaeology.