Submission response to Bournemouth, Dorset and Poole Mineral Sites Plan Cumulative Impacts Screening Exercise

AS25 – Station Road

Water

MSDCC-82 notes the potential for cumulative impacts of siltation from the sites designated as 'cluster 4'. Such impacts will be considered more fully during quarry design in preparation for the planning application stages. There are a number of well-established methods that can be employed to ensure the level of suspended solids within water discharged is kept to a minimum, including series of settlement lagoons. It is expected that the mineral operator will be required to comply to water discharge standards set by the Environment Agency.

With regards to the potential for cumulative impacts of fuel contamination, the mineral operator will be required to ensure the necessary protection measures are put in place, that may include appropriately bunded stores of hydrocarbons. The likelihood of multiple events occurring at the same time across the sites within this cluster is considered to be very remote. In addition, mineral operators will be required to have in place strict procedures designed to guard against and deal with accidental spillage.

We note the comments on the potential for impacts on the quantity and quality of water flowing in the watercourse through the village of Moreton. Fluctuations in the flow of this watercourse occur naturally due to seasonal changes and the effects of weather, in addition to which the existing agricultural use will also have an impact. It is therefore expected the flow will remain largely unaffected during any period of mineral extraction during which there may be some minor and temporary additional fluctuations. Every effort will be made to minimise the impact of the quarrying activity on the quantity and quality of flow through the village. Furthermore, the landowner will have a particular interest to ensure there are no significant changes to the flow through the walled garden and the village.

Cultural Heritage – Archaeology / Historic Landscapes and Historic Buildings

Please see The Historic Environment Consultancy comments below

AS26 – Hurst Farm

Biodiversity

The final design of the quarry will take into consideration the potential risk of loss of hedgerows / significant trees with appropriate mitigating measures to be employed and are likely to include additional planting and hedgerow replacement.

Human Health

Appropriate phasing of the quarry workings will include consideration of these potential cumulative impacts to ensure they are capable of mitigation.

Water

The landowner is already engaged with relevant parties in initial discussions as to the inclusion of wetlands in the final restoration design which may lead to further reduction in the levels of nitrates in runoff that drains into the River Frome.

Cultural Heritage – Archaeology / Historic Landscapes and Historic Buildings

Please see The Historic Environment Consultancy comments below

Halletec Environmental Ltd on behalf of Moreton Estate

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1. Overview

Moreton Estate broadly support the Dorset County Council's (and thus Context One) assessment of the impact on the Historic Environment and the recent analysis of Cumulative Impacts. We note that our analysis remains unchanged and is largely unchallenged by FRAME. "See Documents
MSPEXT 01 Moreton Estate Heritage Audit May 2016
MSPEXT 02 Moreton Review of Impact on Heritage Environment May 2016
MSPEXT 03 Moreton Estate Review of Impact on Heritage Environment 2018 Jan 2018
MSPEXT 04 Moreton Estate Heritage Audit February 2018

Dr Colcutt in document FRAME HD 8e states:

> *"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."*

This is at best misleading if not untrue. Only a generic date for the Lidar Survey is available. His comments misunderstand the methodology of Viewshed Analysis. http://www.historicenvironment.co.uk/

He accepts that the heritage analysis has been done but disagrees with the conclusions without stating on what basis he disagrees.

We note that Dr Collcutt in Frame HD 08l letter to Mrs Ord states that: *"(a) you should ignore and discard any material written or verbal under my name put to you after the date of the 18th September 2018; and (b) I would be obliged if you would take great care with all documents in this case written by me prior to that date since I would warn you that they contain or may contain material fallacies or opinions based upon such fallacies albeit these documents written with due care and in all good faith at the time of submission."*

2. Below ground archaeological remains.

In short it is not possible to extract minerals in valley bottoms in South England without disturbing some archaeological remains. Thus strategic planning must concentrate on the most significant ie Scheduled Ancient Monuments and can only consider what is known to be present on a balance of probabilities, not the minor hypothetical, or worse still combination of hypothetical situations.

The known archaeological remains on all three extraction sites are relatively minor albeit some are extensive. None merit physical preservation in situ and thus by definition following their archaeological excavation the cumulative impact is not sufficient to prevent mineral extraction at all three locations.

The DCC study of cumulative impact fails to take into account basic principles when dealing with “archaeology” which are vital to all planning decisions and particularly strategic planning. Not all archaeological sites are equal some are more equal than others. For thirty years there have been in place:

1. The threshold for physically preserving archaeological remains is “National Importance” defined by the 1979 Act and the judicial review Regina v Secretary of State for the Environment ex parte Rose Theatre Trust Co. QBD 1990
2. Archaeological Excavation is a destructive process but is called preservation by record.
3. Not all archaeological sites are known and at the detailed planning permission stage it must be established that there are no archaeological sites of national importance present Scheduled as an Ancient Monument (as defined by 1979 Act)

While “Development Control” is not perfect it has to assumed that it is perfect and a suitable programme of archaeological investigation and recording will take place. This is not cheap - on one current project 1 Ha of archaeological investigation and recording will cost £500,000 +VAT. Thus for mineral extraction the presence of extensive archaeological remains is broadly self regulating as archaeological excavation extraction will wipe out the profit for mineral extraction. The DCC cumulative impact study is thus very pessimistic in its outlook on archaeological investigation and thus overstates the cumulative impact.

3. Archaeological Potential

Archaeology is about finding out the unknown - for example if a big enough area is considered in Southern England then previously unknown archaeological sites will be located. The archaeological development control process is about establishing what is present. Until a piece of land is archaeologically excavated the full extent of archaeological remains will be unknown.

Mineral extraction also provides an opportunity to discover and research hidden remains that may otherwise not yield up their secrets or add to our knowledge of the historic environment if it were not for opportunities afforded by quarrying.

4. Water Meadows

Water meadows (a series of channels used to control flooding in order to improve soil fertility and promote early growth) are extremely common in chalk land valley bottoms. Their low importance is such that the public benefit of gravel extraction justifies their removal. At the cumulative impact stage a check is made to ensure that some examples will survive.

5. Regional concentration

Some rare types of archaeological monuments occur in regional concentrations. A key task of cumulative impact studies is to check there are no such sites present and thus eliminate this possibility. Examples of this are henge monuments in Yorkshire or cursus monuments in Oxfordshire. In the case of Dorset one example is the prehistoric “Linear Boundary” found on AS06 Great Plantation.

6. Listed Buildings and Conservation Areas

There is no physical harm to any Listed Building proximate to AS25 or AS26. The cumulative impact of all three extraction areas will not change the significance of any of the listed buildings in the vicinity of any of the proposed extraction areas to such an extent

that the grade of listing would change. Therefore by definition the cumulative impact is less than substantial harm and can be outweighed by the public benefit of mineral extraction.

The cumulative impacts on settings have to be considered in the context of other statements on noise and dust and similar which are considered separately. The effects of mitigation must also be considered.

The impact on individual settings are all relatively minor and the cumulative impact of two further extraction sites some distance away therefore makes no cumulative difference to the impact on individual settings.

The bulk of the listed buildings are located in the Moreton Conservation Area and the study of the impact of the Station Road (AS25) extraction area considers the impact on this "grouping". Other more distant proposed extraction sites therefore make little difference to this assessment.

It is therefore considered that there is little or no cumulative impact which would not be considered at the application stage.

7. The Context 1 Documents

The presentation of Context One, for Dorset County Council, Heritage Reports is far from ideal and has led to confusion by FRAME. The documents produced in September 2018 are additional supplementary information covering for example listed buildings. Below ground archaeology is dealt with in the December 2017 submissions.

Dr Peter Wardle
14/11/2018