



Historic England

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Dear Ms Hardy

Bournemouth, Dorset and Poole Waste Plan: proposed household recycling centre at Loudsmill, Dorchester

The primary considerations, from a heritage perspective, of the proposed household recycling centre development at Loudsmill are its potential impacts on the setting and significance of the scheduled monument complex at Mount Pleasant (the Mount Pleasant henge enclosure, Conquer Barrow and associated Bronze Age barrow cemetery), and on the setting and significance of the Grade I listed Kingston Maurward House and its accompanying Grade II* Registered Park and Garden. Importantly, the proposed development, located at the east end of a narrow tongue of allocated development land between the railway line and the River Frome, will extend the reach of built development into the rural landscape, with the low hill of Mount Pleasant henge enclosure on the south, and the Frome floodplain and Kingston Maurward House and Park to the north.

The Context One report '*Loudsmill, Dorchester Heritage Impact Assessment*' commissioned by the County Council, presents a useful review of the affected heritage assets and of the principal potential impacts of the proposed development upon them. Below we consider the key considerations for assessing the impact of the development on heritage setting and significance, and offer our assessment of the nature and scale of the potential impact and harm that the development would bring to the heritage significance of the affected designated heritage assets, and potential ways in which this impact could be mitigated in order to achieve a development which would satisfy the requirements of national and local planning policy.

Heritage setting considerations

The setting of a heritage asset defined as:

'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'

(NPPF Annex 2); PPS 5 *Practice Guide* para. 113).

Several key points about the setting of heritage assets are relevant to this proposal:

- All heritage assets have a topographical presence and a setting, including those consisting primarily of buried archaeological deposits.

- Assessment of impact on setting for planning purposes should take account of the whole of an asset's setting, irrespective of current public accessibility. NPPF and HE setting guidance are clear on this point:

'The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstances.'

(NPPF *Planning Practice Guidance: Conserving and enhancing the historic environment*, 'What is the setting of a heritage asset and how should it be taken into account?' para. 013; Historic England, *The setting of heritage assets (Historic Environment Good Practice Advice in Planning: 3)*)

This is relevant to heritage assets and their surroundings which, for reasons of ownership or land use, are not at present readily accessible to the public (as is the case with Mount Pleasant and Conquer Barrow). Impacts of development proposals on these areas of an asset's setting need to be taken into account.

- Impacts on setting are not limited to visual impacts alone. Although views of or from an asset will play a key part, the way in which an asset is experienced in its setting is also influenced by other environmental factors such as noise, dust, smells and activity in the vicinity. It is also influenced by our understanding of the historic or archaeological context of the asset and the relationship or association between historic places.
- The implications of cumulative change also need to be taken into account when assessing applications for development which may affect the setting of a heritage asset.

The proposed development will be visible from sections of the Mount Pleasant scheduled monument complex and will have an impact on its setting.

The relationship of prehistoric henges and barrows to their local landscape and topography is a key factor of their heritage significance. These landscape monuments combined a ceremonial, ritual and funerary function with that of territorial markers, and are often prominently sited on features such as hills, ridges and river valley terraces. Mount Pleasant henge enclosure and its accompanying barrows occupy a prominent domed hill on an irregular east-west ridge overlooking the Frome Valley. The henge complex here was the easternmost of a series of major and nationally very significant Neolithic monuments on this ridge, one of which survives at Maumbury Rings, in Dorchester.

Such monuments were designed to be seen and to serve as landmarks and viewpoints for the surrounding landscape. In heritage setting terminology, these sites incorporate primary '*intentional*' or '*designed*' views to and from the surrounding landscape, their location being carefully chosen to be clearly visible from the surrounding area and at the same time providing extensive views across their surroundings.

The Mount Pleasant complex is a prime example of this topographical siting. The relationship of the henge enclosure and its accompanying barrows and other features

to the local landform and river valley landscape is of fundamental importance to the monuments' heritage significance. The location of these monuments on this prominent hill, overlooking a broad sweep of land on each side, gives the monuments a role as landscape markers and viewpoints. The hill itself is effectively 'landmarked' by the henge and Conquer Barrow. In visual terms, views of the Mount Pleasant henge complex and its hilltop from the immediate and surrounding landscape, and views from the complex into its surroundings, are important to an appreciation and understanding of the monuments, and area key aspect of their heritage significance and public value. (Views here should be understood as dynamic views moving through the landscape, and sensitive to subtle variations in topography and viewpoints.)

Although the massive bank and ditch enclosing the henge are nearly ploughed flat, they can still be traced by low undulations, with the chalk from the former bank material visibly exposed in the topsoil. The linear 'avenue' feature running north-east from the henge enclosure towards the River Frome can be traced as a linear depression running down the slope to the valley floor. Conquer Barrow still survives as a substantial artificial mound. The topographical relationship of the barrow and the henge and its linear 'avenue' to their surroundings can still be readily appreciated. The site occupied by the monuments also provides views in all directions, including towards the Loudsmill proposal site on the valley side to the north, both in views from the northern section of the henge enclosure and from Conquer Barrow. The topographic setting of the henge with its linear 'avenue' running towards the river, suggests that the associative relationship of the monument with the river and the land in these northern quadrants was a primary one for its builders, and it still is a primary one relationship in terms of the setting and context of the monument.

The Context One report reviews the nature and significance of the heritage assets of Mount Pleasant henge enclosure and Kingston Maurward House (amongst other heritage assets), and assesses the potential impact on their setting and significance. It concludes that there would be no significant impact on the setting and significance of these assets. However, we consider that the Context One report underestimates the potential impact on setting and significance both with regard to the Mount Pleasant henge complex and Kingston Maurward House and Park and Garden. For instance, the ZTV / ZVI coverage relates to the visibility of the site, rather than the proposed development, where the upper roofed range, at 6-7m high, in particular, will be visible from a significantly wider area than the bare undeveloped site. The comparisons made in the Report between the proposed development and an existing gabled building in the presently development area to the west are also not a good indicator of the prominence of the proposed roofed structure 6-7m high. The gabled building has only a narrow apex and the receding planes of a pitched roof, whereas the proposed flat-roofed structures on the household recycling centre will have a more 'monolithic' appearance and as such are likely to have a greater visual presence in this landscape setting. With traffic movements around the upper public level of the structures, it will also have added impacts of noise and activity, and a significant overall impact in comparison with the present undeveloped site.

The Mount Pleasant monument complex

The report mentions that public access to the Mount Pleasant site is limited to a footpath which is currently closed off. However, as mentioned above, whilst the presence of public roads and paths may have a bearing on current public appreciation or communal value of a heritage asset, the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting.

Notwithstanding the presence of the railway and existing development in the area alongside, we consider that the proposed household recycling centre development will have an impact on the setting and significance on the Mount Pleasant monument complex, both in its own right and cumulatively with other development here. The fact that a complex of monuments is affected increases the level of impact. As well as the intrinsic interest and significance that the henge enclosure and the other archaeological sites within and around the application site may have individually, their significance is enhanced by the 'associative value' arising from the inter-relationships and associations between these sites. Associative value is linked to (but not limited to) visual association, and contributes to the setting, context and significance of a heritage asset. It also increases the sensitivity of associated assets to impacts of developments and increases the general or collective level of impact on the affected assets. Thus the overall total impact on the setting and heritage significance of the group of assets here in combination is greater than is suggested by the individual assessment of separate assets, or the simple collation of the individual impacts. In short, the total impact of the proposed development here would be greater than the sum of its parts.

A further point made in the Report (p. 24) is that 'The more immediate landscape setting of the monument [Mount Pleasant] has already been considerably compromised', and that the proposals would not constitute a major alteration to the setting. However, the existence of intrusive development in the setting of a highly designated heritage asset does not justify further intrusive development; on the contrary it increases the sensitivity of the setting to further impacts from new development, and emphasises the need to avoid or minimise harm and provide effective mitigation. Moreover, whilst there is existing intrusive development on the western section of the belt of land here north of the railway, the eastern part of this land is undeveloped and basically rural in appearance, and the proposed development would bring significant changes to the character of the area and to the setting of the heritage assets in view.

Taking all the relevant factors into account, we consider that the proposed development will have a significant impact as a change to the present baseline setting of the nationally important Mount Pleasant monument complex, due to its intrusive and distracting impact on views and the noise and associated activity the development would bring to a currently quiet area adjacent to open countryside. In our view, this impact would cause harm to the significance of these designated heritage assets, individually and as an associated group of assets in relationship. We consider that the level of harm would (in NPPF terminology) be less than substantial but significant enough to be taken into account in the planning balancing exercise. (NPPF paragraphs 131, 132, 134 and 137 apply).

Kingston Maurward House

With regard to Kingston Maurward House, the proposal site lies within one of the primary designed views from the house, looking south from the main Garden Front. This southern aspect was a main focus for the 18th century landscaped park and gardens. There are also views of the house from the south boundary of the application site, where the top storey of the House is visible above the trees, and views from Mount Pleasant, where more of the house and its park is visible.

The Report shows a representative view from a second-floor window of the south Garden Front of the house, looking southwards across the gardens towards Mount Pleasant and the distant hills at Conygar. This is one of the primary 'axial' views from Kingston Maurward House, in which the wider landscape beyond the Park is a 'borrowed view' which forms a key part of the landscape composition seen from the House. This view contains a clear sequence of distinct elements, from the near gardens and Parkland, to the water meadows of the Frome Valley, then in the middle distance the low hill occupied by Mount Pleasant henge complex and a companion hill to its east, and finally to the low Conygar ridge on the far horizon. There is very little built development in view, and this is only in the distance. Mount Pleasant forms a strong element in the middle distance, forming a clear intermediate 'horizon' of farmland between wooded foreground and the distant ridge on the far horizon. Any new built development intruding on this primary axial view, especially around its central axis, will have an impact on the setting of Kingston Maurward House.

The upper floors of the House are known to be intervisible with the south side of the application site, and field assessment indicates that built development of the kind proposed within the proposal site is likely to be on or near the central axis of these primary views, in front of the Mount Pleasant hill which, as noted above, forms a key element in these views. Looking the other way, from Mount Pleasant northwards across the railway line and the existing development and proposal site, Kingston Maurward House is clearly visible in its parkland. The proposed development will have a degree of intrusive impact on these views, both from the built structures and associated activity. These views towards Kingston Maurward House are significant in terms of heritage setting, in that Mount Pleasant provides the main vantage point for views of the south front of the House and Park in its landscape surroundings. In fact Mount Pleasant may have got its name in the post-medieval period from its position as a local landmark and viewpoint for views to and from Dorchester town and Kingston Maurward House.

We consider that, overall, the development of the Loudsmill site for a household recycling centre, with the form of building and site operations proposed, will have an impact on primary designed views from Kingston Maurward House, and on views towards the house and park from Mount Pleasant, and that this impact will potentially cause some harm. We consider that, in NPPF terminology, the level of harm would again be less than substantial but significant enough to be taken into account in the planning balancing exercise.

In addition to the impacts on individual heritage assets, the combined or collective impact also needs to be taken into account. This applies both to the Mount Pleasant

complex comprising several assets and to the Mount Pleasant complex together with Kingston Maurward House. Again, the total impact of the proposed development on the affected heritage assets would be greater than the sum of its individual parts. We consider that the total level of impact and harm on the affected heritage assets would be less than substantial but significant, and that it should be taken into account in the planning balancing exercise.

Recommendation

Historic England acknowledges that the provision of local household recycling centres provides important public and environmental benefits, and is something that national and local government seeks to promote. We do not object in principle to the proposed development of the Loudsmill site for a relocated and expanded household recycling centre, as long as the development can be achieved without undue harm to the affected heritage assets. However, for the present proposal to be consistent with policies for the protection of heritage assets and for sustainable development, it will need to minimise and mitigate the harmful impacts that the development would have on the setting and significance of the highly designated heritage assets of Mount Pleasant henge enclosure and associated monuments, and Kingston Maurward House and Park. Relevant national planning policies are NPPF paragraphs 131, 132, 134 and 137.

With regard to mitigation of impact, it would appear that, due to the position of the proposal site on the floodplain, there may be little scope for 'mitigation by design' though lowering the ground level and above-ground profile of the structures and raised vehicle route of the facility. Nevertheless the potential for lowering the height or reducing the mass of the highest structures in the household recycling centre should be investigated.

There is clearly potential scope for mitigation through a suitable landscaping scheme providing screening, which here should include tree and shrub planting around the outside of the proposal site. The S, E and W sides will be most sensitive for views from Mount Pleasant, or for views from the surrounding area where Mount Pleasant would be seen in conjunction with the proposed development. The N side of the proposal site would be most sensitive in relation to views from Kingston Maurward House and from the footpath along the valley adjacent to the proposal site. Planting should be in native broadleaf trees and shrubs, in keeping with the historic landscape character of the area. In the case of the S, E and W sides, we advise that planting should be more than a single row of trees, and should effectively form a belt at least three rows wide, in order to ensure effective screening of new development and activity on the site, especially when the trees are not in full leaf. On the N side, trees along the side of the proposal site may provide screening in conjunction with trees along the watercourse to the north, in which case there could potentially be a narrower tree belt within the proposal site.

The mitigation strategy will need very careful consideration if harm to the setting of the affected highly-graded designated assets is to be mitigated effectively and these harmful impacts minimised. It is essential that this mitigation (along with appropriate

mitigation of any ground impacts on buried archaeological remains) should form a fundamental part of any development proposal and any policy for use of the site for waste recycling. If the proposal site cannot accommodate this level of screening, then we advise that the basic design of the proposed household recycling centre will need to be amended in order to achieve a scheme that would satisfy national and local planning policy on the protection of heritage assets and historic environment.

Yours sincerely,

Handwritten signature of Keith Miller in black ink.

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