

**DORSET COUNTY COUNCIL, BOURNEMOUTH BOROUGH COUNCIL
AND BOROUGH OF POOLE MINERAL SITES PLAN (“the MSP”)**

NOTE ON MSDCC 73 & MSDCC 74

INTRODUCTION

1. Frome Residents Against Mineral Extraction (“FRAME”) made written and oral representations in respect of the late publication by the MPA of two documents prior to the Examination hearings: MSDCC 73 and MSDCC 74.
2. It has further transpired that MSDCC 74 has been very recently updated – within a matter of days of the 31 October deadline for comments – see MSDCC 74B. Once again, this approach by the MPA is unacceptable, shows a complete disregard for fairness and public participation and should be deprecated.
3. Further, it is a great frustration that neither MSDCC 73, MSDCC 74 nor MSDCC 74B have taken into account or even mentioned the previous submissions on cultural heritage matters made by FRAME or indeed any other participant in this process.
4. FRAME’s position is that both MSDCC 73 and MSDCC 74 are flawed assessments for the reasons set out below. This is symptomatic of the MPA’s rushed and superficial approach to matters of central importance to Cluster 4.

ERRORS OF APPROACH

5. First, it appears that both documents have failed to appreciate that the Moreton Conservation Area boundary is on the south side of Station Road (aka The Avenue). This error is fundamental and inexplicable.
6. Secondly, it is well established by this point that neither document considers cumulative impacts. The consequences of this have already been dealt with in other submissions, but it is noteworthy that there is recognition of at least in principal potential for cumulative impacts: see, for example MSDCC 73 at page 26. Further,

there is a recognition that the “*combined effect of neighbouring sites being worked ... would increase the impacts*” (ibid).

7. Thirdly, there is a confused approach to the distinction between mitigation (protective measures to prevent or reduce harm) and compensation (harm not reduced but offset by provision of some other desirable factor).
8. Fourthly, the radius of search has been taken from a single fixed point in the centre of the allocations. This is erroneous given that the sites are over 1km in width (AS19 is 1450m wide, AS25 is 1400m wide and AS26 is 1400m wide), thus an area of search of c. 1.5km is in reality a significantly smaller and inappropriate area.
9. Fifthly, despite appearing to recognise the need to consider upper storey views, there is no analysis undertaken of any such views.

OMISSIONS

10. First, the treatment of archaeology in both documents is cursory at best. The only assessment is in respect of built heritage. This is despite the fact that archaeology is a key issue, as explained in the examination hearings. In particular:
 - (a) MSDCC 73 contains no mention of the earlier prehistoric potential within AS26;
 - (b) The terms “*quaternary*”, “*Pleistocene*” and “*Palaeolithic*” are wholly absent from MSDCC 74- and there is no analysis on these matters either, for example of the different gravel terraces which are present and the potential for these areas to contain artefacts of various Palaeolithic ages (see FRAME HD - 08);
 - (c) these omissions are particularly stark given the recognition in both documents of the “*natural high groundwater*” (page 5, both documents); and
 - (d) taken together this is a serious and inexplicable omission.
11. Secondly, there is no consideration of Thomas Hardy, particularly in respect of MSDCC 73 and AS26. This is an inexplicable omission, given the clear evidence of the cultural heritage associations with the Valley of Great Dairies. This association

appears to be accepted by all parties, even if the magnitude of harm is disputed, thus the omission is stark and serious.

12. Further, this is exacerbated by the omission of any reference to Woodsford Lower Dairy which falls within the wider search area chosen by C1. Thus the opportunity to consider the cumulative dairying theme has been lost, despite its significance.
13. Thirdly, the documents omit to assess the impact on:
 - (a) Clyffe House (Grade II listed with designed view and much visibility over AS19 and AS26);
 - (b) Moreford Hall (a none designated heritage asset which was demonstrated to overlook AS25, contrary to C1's analysis that "*due to the relatively flat topography no assets overlook or are overlooked by the site*"). This is true also for Daisy, Woodleigh and the Coachhouse cottages and also Hurst Cottages (MSDCC73);
 - (c) Hurst Dairy Farmhouse and the estate cottages at Hurst Bridge which are non-designated heritage assets and which have clear potential for cumulative heritage impacts together with Hurst Dairy House, Dairy Barn (both GdII listed) and Hurst Bridge (Monument); and
 - (d) the Obelisk a scheduled monument (see, for example the omission in Table 1 of MSDCC 74 and note that there is no mention of the word "obelisk" at all).
14. Fourthly, there is a passing reference in MSCDCC 73 at page 5 to Sculpture by the Lakes as a "sculpture park" without any analysis of the impact on this site.

CONCLUSION

15. The picture which emerges from the above submissions is stark: the assessment in both documents is incomplete and proceeds on an erroneous basis. As such, FRAME submit that there is insufficient evidence which is sufficiently robust and credible for these allocations to be found sound. This is particularly the case given the weight of evidence demonstrating heritage harm. Further, it is telling in this regard that C1 state in MSDCC 73 at page 27 that the "exact impacts" cannot be assessed at this stage given the uncertainty over how the three sites will be brought forward. This is

symptomatic of the uncertainty more generally and thus the unsoundness of these allocations.

31 October 2018