



ENGLISH HERITAGE

The Christchurch and East Dorset Council's Core Strategy / Local Plan Examination in Public

Matter no. 5 Strategic Allocations – FWP7, West of New Road, West Parley.

Does the allocation address the need to sustain and enhance the significance of the heritage asset at Dudsbury Hillfort?

Does the policy provide a clear strategy for development?

Statement of English Heritage (no. 359478)

1. What part of the plan is unsound

Policy FWP7 - development and link road as proposed to the west of New Road, West Parley.

2. Which soundness criteria it fails

- Positively prepared – inconsistent with national policy for the delivery of sustainable development (see pt 3 below)
- Justified - failure to provide proportionate evidence. The HLA, as critical evidence to the Plan, was prepared after the location and scale of development was indicated and only provided to all parties for consideration on Friday 16 August 2013. The HLA (para 3.63) also considers that a landscape and visual assessment is required to assess skyline changes. As this is an issue of principle the evidence should be gathered to inform the location of development at this stage. Insufficient evidence is provided to consider the impact of any attenuation and mitigation of the link road.
- Inconsistency with NPPF (see appendix 1).

3. Why it fails

- 1) This proposal is for new housing and a link road (likely to be busy and climbing a hillside) to be located in a conspicuous and sensitive location at West Parley in the lower Stour valley. The relevant heritage asset affected, and therefore addressed in this statement is the scheduled monument of Dudsbury Camp Iron Age hillfort (county number DO90; National Heritage List Entry no. 1003583) which is located 75m from the north-west section of the proposed development area.

- 2) Dudsbury Camp, due to its size and position, is the most prominent and significant historic landscape feature in the area. The Camp's setting is an important part of its heritage significance, and is highly sensitive to impacts from new development. **The proposed development would form a prominent feature within this setting, in a sensitive area of the riverside landscape slopes east and south east (east?) of the Camp.**
- 3) English Heritage's advice is based on the NPPF as well as *The Setting of Heritage Assets – guidance on the management of change within the setting of heritage assets (EH 2011)*. The setting of a heritage asset is defined as *the surroundings in which a heritage asset is experienced*.
- 4) Assessments of the impacts of new development proposals on the setting of heritage assets often focus on visual considerations (views). However, the perception and experience of a heritage asset encompasses all the senses, and setting also comprises other elements including factors such as noise, vibration, spatial associations and understanding of historic relationships.
- 5) The proposal is supported by a Historic Landscape Assessment: Strategic housing allocation (FWP7) at West Parley (Land Use Consultants Ltd, August 2013), hereafter referred to as the HLA. This report provides useful information and acknowledges that the proposed development and associated link road present a threat to Dudsbury Camp scheduled monument, and suggest that this harm may be lessened if certain mitigation measures are adopted. However, in our view the **HLA underestimates the significance of the impact of the development on the setting and significance of Dudsbury Camp and the proposed mitigation would be inadequate and would itself be harmful to the monument. We believe that the development as a whole would cause substantial harm to the setting and significance of the monument and may not be capable of acceptable mitigation.**
- 6) The landscape here is dominated by the Dudsbury Ridge which rises dramatically above the Stour floodplain to 32m OD, the summit of which is occupied by Dudsbury Camp a D-shaped Iron Age 'promontory' hillfort defined by ramparts, with the riverside 'cliff' forming the straight side of the 'D' and the remaining semi-circle enclosed by earth banks and ditches. Dudsbury Camp is notable as a rare example of a hillfort situated on relatively low-lying ground close to the coast. Despite localised damage by subsequent land use, the monument survives well.
- 7) The relative rarity of this hillfort, the degree of its preservation, its potential archaeological evidence, the quality and form of its visible remains, its still legible landscape context and setting and its good accessibility and communal use, give the monument especially high heritage significance.
- 8) The quality and form of its defences, and its clear topographic siting on the riverside bluff dominating the lower Stour valley increase the value of the monument's visual appearance and setting, and its sensitivity to the impacts of new development.
- 9) With regard to landscape setting, Dudsbury Camp has a clear relationship to the surrounding topography. The site is well-chosen for its defensive capabilities and its prominence in the local landscape. It provides commanding views of the local

landscape and is also visible from a wide area. The ridge dominates this section of the Stour valley and a wide adjoining area of low ground, and the form of the ridge offers good natural defences, with the riverside cliff overlooking the river, and the ridge on either side (including the proposed development site) providing sloping ground that could be overlooked and controlled from the fort's ramparts.

- I0) Also relevant is the relationship of the Camp to the later surrounding settlement pattern, as the fort continued to form a significant feature in the landscape during the centuries when the present settlement pattern developed. These factors increase the heritage significance of the monument, and also (importantly in relation to the present application) increase the contribution and significance of its landscape setting, particularly its relationship to the local settlements and other features in the local historic landscape.
- I1) It is clear therefore that the topographical location and landscape setting of the scheduled monument, and its physical and visual relationship to its surroundings, is important to its heritage significance and to an understanding and appreciation of the monument and of its relationship with the landscape and with other historic features in the area.
- I2) The surrounding area has been impacted by post-war housing developments, but **the local landscape around Dudsbury Camp retains much of its historically open character and is important in terms of the setting of the monument.** To the west of the Camp the historic landscape character has been somewhat compromised by the creation of a golf course, whilst to the east, and to the south across the river, the historic rural landscape character survives more intact as farmland, paddocks and woodland. Within this area, the undeveloped land to the east of the Camp (including the proposed development site) forms an important and topographically well-defined area of open space alongside and between the modern developments. The setting of the Camp can be appreciated from the site itself and in views looking towards monument from the surrounding landscape. The site has relatively good public access and usage. Public footpaths (the Ferndown, Stour and Forest Trail, and the Stour Valley Way) pass alongside and through the monument and the proposed development site, providing a wide range of views of the monument in its setting. An important consideration (sometimes referred to as 'synergistic' or dynamic impact) is that the development would be seen and experienced repeatedly by people / receptors moving around or through the area, for instance on the footpaths or nearby roads.
- I3) However, the setting of a heritage asset encompasses all of the area in which the asset can be experienced, and assessment of impact on setting for planning purposes should take account of the whole of an asset's setting irrespective of current public accessibility.
- I4) The impact of new development will be accentuated by rising topography. (HLA para 3.63) and existing development is contained below the ridgeline. Proposed development would breach the ridgeline. (HLA para 3.80)
- I5) The development would be sited on land from as close as 75m to the Camp and would impact on views from and of the monument in its landscape setting. In views looking to and from the E and SE, and in views taking in both the monument and the

development site from the S, **the proposed housing and link road and HLA recommended associated screening of bunds and trees, would form a prominent feature occupying a significant part of the Dudsbury ridge, in places breaking the horizon line and competing with the fort for dominance. The development would encroach and intrude on the existing open pastoral setting of the monument, having an “urbanising effect” (HLA para 3.68) and would dominate, limit or prevent views of the landscape context of the hillfort, thereby harming the appreciation and understanding of the monument and its significance as a dominant feature in the local landscape.**

- 16) The HLA, in its assessment of the impact of the proposed development on Dudsbury Camp, acknowledges that the setting would be adversely affected (e.g. paras 3.77, 3.78). However, in our view the report underestimates the significance of these impacts. This is partly due to the HLA’s emphasis on views on the south and west sides of the Camp and under-assessment of the significance of the eastern aspect, facing the proposed development, and to its assessments of the screening effect of existing trees, and of the significance of modern development which it suggests already diminishes the setting of the monument (on this question of modern intrusions, see below).
- 17) The significance and sensitivity of views to and from the east of the monument are not fully addressed by the HLA. Whilst the most dramatic views may be on the south and west sides (HLA para 3.36), the northern and eastern aspects and views are still highly significant, and are especially sensitive to impacts from new development. The Location of the development and route of the link road fails to sufficiently take account of, or respond to the actual character/landform and topography of the site, and impacts on the setting of the Dudsbury Camp as a consequence.
- 18) In our assessment, views from all sides of the hillfort, not just the south and west, contribute to the understanding and appreciation of the monument, and should be sustained and enhanced where appropriate (NPPF annex 2). The contrast in the nature of the defences between the south side and the north and east sides is itself very instructive. **The monument should be understood and managed holistically, and the eastern side not ‘written off’ as less significant or already compromised and therefore more amenable to development.** On the contrary, the sensitive and vulnerable nature of the monument and its setting in this eastern quadrant argues for a strategy for enhancement of the monument and its setting, and clear limits on further development east and south east of the monument.
- 19) Moreover, it is not only the eastern part of the monument that would be affected by the proposed development; the development would be clearly visible and intrusive in key views of the hillfort from the south and west, where it would appear on the flanks of the ridge, in places breaching the ridgeline (para 3.80) and horizon.
- 20) The report notes that views to and from the Camp on the eastern side are affected by modern features and by the trees which have colonised the ramparts. (E.g. paras 3.31, 3.50-51, 3.9) However, in our view the report over-emphasises these aspects.

- 21) The modern equestrian-related features east of Dudsbury Camp are small-scale and generally of a relatively temporary nature. The public house is limited in extent and impact. Existing development here is of a scale and located in a context that makes it quite distinct from the proposed development which in contrast would be a more distracting and intrusively harmful feature in the landscape.
- 22) Moreover, the existence of any distractions in the present landscape or setting of the hillfort, or their promised removal within a SANG, does not in itself justify additional intrusive development nearby which would have greater additional impact on the setting of the designated heritage asset.
- 23) The HLA cites trees and vegetation as screening views of and from the Camp, especially on the east side (e.g. paras 3.36, 3.31). However tree screening cannot be regarded as limiting setting to the extent claimed by the HLA.
- 24) Assessment of potential for screening by vegetation, notably trees and hedges, needs to take into account that they are subject to seasonal variation and to natural loss and management work (cutting, removal, replacement etc.) that could significantly affect their screening effect.
- 25) Importantly, existing trees and shrubs cannot be relied upon to provide screening in future, as they are subject to natural loss and to normal management work that could significantly reduce or remove any screening effect.
- 26) The HLA is also somewhat inconsistent. Whilst it notes the potentially damaging impact of trees on the archaeological remains, and the desirability of clearing trees to open up views, it does not apply these comments to the eastern side facing the development, but instead emphasises the need screening role here. In our view the preferred management strategy for Dudsbury Camp as most earthwork monuments, is for the thinning and removal of tree cover, opening up access and views to and from the monument (so that its form and its relationship with the local landscape can be better appreciated and understood).
- 27) In our view the application has not demonstrated that the screening provided by existing vegetation would be acceptable in heritage terms, or effective or dependable enough to prevent potential harmful visual impact on the setting of the monument.
- 28) Nor does the HLA demonstrate that the proposed additional screening for the development would be acceptable. The recommended earth bunds and tree planting alongside the link road (which the HLA emphasises would need to be **'significant'**) would be at variance with both the landform and the historic pattern of rectilinear fields and would themselves form intrusive features in the setting of the monument. By screening the new development, the proposed bunding and tree screening would necessarily limit or intrude into views important for appreciating the relationship of the Camp to its landscape setting. The fundamental relationship of the Camp to the local topography and landscape would thus be harmed by both the proposed development and its associated screening.
- 29) As well as visual impacts, the proposed development, notably the link road, will have an intrusive impact on the setting of Dudsbury Camp through noise and activity, road lights, vehicle lights etc.

- 30) The development would be a prominent and disruptive feature in the landscape and its impact would be to reduce the existing pastoral characteristic and thereby the relative distinctiveness of the local landscape character area, contrary to NPPF para 131 and the desirability of new development making a positive contribution to local character and distinctiveness.

CONCLUSION

- 31) English Heritage will support proposals that enable the delivery of sustainable development in accordance with the policies in the NPPF with one of the core dimensions being the protection and enhancement of the historic environment.
- 32) The proposed road and development would be a prominent intrusive feature within the setting of the hillfort, significantly altering its baseline setting, adversely affecting important views from and of the monument in its landscape setting, and harming the appreciation and understanding of the hillfort and its relationship with the landscape. As such the proposed development would in our view substantially harm the monument's setting and heritage significance.
- 33) The nature of the topography here (with roughly level ground immediately outside the eastern section of the fort, with a low ridge or spur to the east beyond which the ground drops away towards the river) means that any 'buffer' between the monument and modern development needs to be a large one, respecting landform and horizon lines, in order to avoid harmful intrusion into the setting of the monument.
- 34) The proximity and visibility of the proposed development area in relation to the monument argues for limiting development here to its current level, and seeking ways to enhance views and setting (for instance through woodland and hedgerow management initiatives), rather than increasing new development and activity within the immediate setting of the monument.
- 35) In our view there is potential for a significantly more harmful impact on the setting and significance of the designated heritage asset of Dudsbury Camp than the report acknowledges. In our view the harm would range from substantial (in the case of the nearest areas of housing development and the link road), to less than substantial. In our view the proposed mitigation (in the form of areas of SANG and screening of the new development by trees and earthwork bunding) would not adequately mitigate the potential harm. Indeed the proposed mitigation of the impacts of the development by tree screening and earthwork bunding would, due to their spread over the ridgeline and proximity to the monument, have an intrusive and harmful impact on its setting. The laying out of the intervening space between the development and Dudsbury Camp as SANG parkland would have some benefit in terms of the management and public appreciation of the monument; however this would not outweigh the damaging impacts of the development.

4. How the plan may be made sound

It may be possible to achieve an acceptable level of development by a significant reduction in the area to limit it to the easternmost section of the site so that development (including the link road) does not intrude above the ridgeline. Further work is required to address the

environmental implications and the design response (gradients, radius of curves etc.) of the link road and mitigation.

5. The precise modification/wording seeking

Any substantial modification would need to be supplemented by additional evidence as described, subject to an SEA and a formal period of consultation.



Appendix I

In our view Policy FWP7 is inconsistent with:

NPPF paragraphs 7, 151

One of the core dimensions of sustainable development is the protection and enhancement of the historic environment. Local plans have to enable the delivery of sustainable development in accordance with the policies in the NPPF. FWP7 fails to do so.

NPPF paragraphs 157 (7th bullet)

The Plan provides an inadequate assessment of the significance of the heritage asset, including settings, to identify land where development would be inappropriate because of its historic significance.

NPPF paragraph 15

Without the above assessment the local authority cannot properly assert that the objectives for sustainable development have been understood and therefore cannot say whether the objectively assessed development needs of the area will be met or not in accordance with the presumption in favour of sustainable development.

NPPF paragraph 131

FWP7 fails to sustain or enhance the significance of the Scheduled Monument, or make a positive contribution to local character and distinctiveness.

NPPF paragraph 137

FWP7 fails to preserve those elements of the setting that make a positive contribution to the significance of the Scheduled Monument nor enhance or better reveal its significance.

NPPF paragraphs 132, 133, 134, and 135

FWP7 would have a potentially adverse and harmful impact on the setting and significance of the designated heritage asset ranging from substantial to 'less than substantial' but still significant. In our view the scale of harm or loss of significance to the designated heritage asset here does not have 'clear and convincing justification', and it has not been demonstrated that the scale of the loss or harm to the heritage assets brought by the development is justified or outweighed by public benefits.