



ENGLISH HERITAGE

The West Dorset / Weymouth and Portland Local Plan Examination in Public**Matter no.13 Policy DOR 10, Park and Ride and Trunk Road Service Area, south of Stadium Roundabout.**

The following statement addresses the question raised by the Inspector:

Do proposals for a park and ride site and trunk road service area south of the Stadium Roundabout (DOR10) represent the best option for providing these facilities given the sensitive nature of the location?

- 1) In our view the impact of such a development would be harmful to the setting and significance of Maiden Castle and the Herringston Barrows.
- 2) The proposal fails to adequately consider the potential impact upon the historic environment. It is supported by a feasibility study (Buro Happold May 2013) which acknowledges that the proposed development would be seen from Maiden Castle scheduled monument, but fails to adequately consider the consequences of this. The feasibility study underestimates the significance of the impact of the development on the setting and significance of heritage assets, most importantly the nearest and most significant assets of Maiden Castle and Herringston Barrows.
- 3) Our statement 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. The perception and experience of a heritage asset encompasses all the senses, and setting also comprises other elements including factors such as noise, movement, spatial associations and understanding of historic relationships.
- 4) The landscape here is dominated by Maiden Castle (National Heritage List Entry no. 101577) which rises dramatically from the surrounding land and dominates views in the area. The hillfort's setting is an important part of its heritage significance, and is highly sensitive to impacts from new development.
- 5) The proposed development would form a prominent feature within this setting, in a sensitive area of the rural landscape surrounding the hillfort. The site includes a complex of features representing a series of settlement and ceremonial or ritual sites spanning several millennia. Its current appearance is closely related to the last period of its expansion around 450BC, when it was tripled in size, making it one of the largest and most impressive hillforts in Britain

and Northern Europe. Maiden Castle is a well-known and much studied and much visited monument. It figures in many works of art and literature, notably the work of Thomas Hardy, which contributes to its heritage significance and public value.

- 6) The scale 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, communal use and literary and artistic associations, give the monument exceptionally high heritage significance and public value, and also a correspondingly high sensitivity to impacts of new development.
- 7) Does this facility have to be a combined Park and Ride, and Trunk Road Service facility? The impact and degree of harm is accentuated by the scale and the extent of the site coverage. Is it essential for both a Park and Ride and a Trunk Road Service Area facility to be located on this highly sensitive site? Are both equally justified?
- 8) Can it be demonstrated that all other reasonable alternatives have been fully explored? For example, is the Weymouth Park and Ride site fully utilised? Are there frequent buses between it and Dorchester?
- 9) An important matter to note is in relation to paragraph 11.6.4 of the Plan and its confirmation that the Trunk Road Service facility in this location has not been justified.

“Adequate justification of the need for the trunk road service area and its location within the AONB will be required to support any planning application”.

- 10) English Heritage would strongly suggest that it is for evidence at the Plan making stage to establish the justification for the principle of the allocation, rather than to defer the matter to a later stage. Without such justification at this stage the Plan fails to accord with NPPF paragraph 132 – any harm must be adequately justified.
- 11) With regard to its setting, Maiden Castle has a clear relationship to the surrounding topography. The quality and scale of its earthworks and its strategic and prominent siting increase the value of the monument’s visual appearance and setting, and its sensitivity to the impacts of new development.
- 12) 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 hillfort dominates views south from Dorchester and a wide adjoining area of low ground. Also relevant is the relationship of the hillfort 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.

- 13) A key factor in the setting of Maiden Castle is the relationship between the Iron Age hillfort site in its rural surroundings, and the later town of Dorchester. The two sites are products of contrasting cultures. The deserted prehistoric hilltop site dominates its surrounding landscape and overlooks its successor, the Roman and later town of Dorchester, situated on lower ground to the north. Importantly, the two remain clearly distinct from each other, with a clear belt of undeveloped farmland separating the two.
- 14) The landscape setting to the north and north east of Maiden Castle is already under strain due to the recent growth of urban development in the views looking north from the monument. Until relatively recently, the wider visual setting in the NE and NW quadrants was largely rural, apart from the section occupied by Dorchester which, because of its largely low-lying location, was visually both relatively discrete and relatively unobtrusive. With the recent development of Poundbury, there has been a very significant growth in the proportion of the visual field to the north of Maiden Castle that is occupied by urban development. As a consequence, the rural belt to the east and north east of Maiden Castle (including the proposal site), has become correspondingly more important in its role in maintaining the rural landscape context of the monument, maintaining a clear distinction between the monument and the town, and maintaining the integrity of both places as separate and individual sites. Any incursion of new development into this rural belt (as proposed by the DOR10 allocation) would have a correspondingly higher impact, harmful to the setting of Maiden Castle.
- 15) In views from Maiden Castle to the east, the proposed allocation site occupies a strip of land bounded to the east by the Weymouth to Dorchester railway and to the west by the main Weymouth to Dorchester road. Viewed from Maiden Castle, the site is terminated to the North by the A35 Dorchester Bypass, and to the South by the hamlet of South Winterbourne and Monkton Park. Development on the site could be as close as 650m to the hillfort.
- 16) The nature of the Maiden Castle monument, with multiple ramparts enclosing a domed hilltop, mean that the surrounding landscape setting (including the proposal site) is visible from many different viewpoints, and would be seen whilst moving around the site. An important consideration is that the development would be seen and experienced repeatedly by people moving around or through the monument and the surrounding area. For instance, when moving up onto the ramparts and the higher interior of the site, the proposal site becomes increasingly visible. The overall 'cumulative' impact of repeated views of new development on the proposal site, on the setting of the monument as experienced from the monument itself would therefore be very significant.
- 17) The setting of the hillfort experienced both in views from the site itself and in views looking towards monument from the surrounding landscape. In views

towards Maiden Castle from the east (including from Herringston Barrows), the monument would be seen in conjunction with the proposal site, where again the impact of new development would be harmfully intrusive.

- 18) The proposed development would adversely impact on views from the monument of its landscape setting. In views looking to and from the E, and in views taking in both the monument and the development site from the S, the proposed park and ride facility and trunk road service area and associated car parks would be prominent, having a serious detrimental effect on the isolated rural setting of the monument. The development would encroach and intrude on the existing open pastoral setting of the monument, having an “urbanising effect” 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.
- 19) Maiden Castle stands in a landscape rich in archaeological sites, many of them statutorily designated as scheduled monuments. The hillfort itself is flanked by prehistoric barrows and settlement features on all sides. Several monuments that would be potentially affected by the proposed development lie in the belt of farmland extending north and east of the hillfort, which contains the proposed allocated site. These monuments include (the Herringston Barrows (NHL 1002831) and the remains of a deserted medieval village at Winterbourne Farringdon (NLH 1020550). For all of these heritage assets, topographical location and visual appearance in the landscape are important elements of their heritage setting and significance, and make an important contribution to public understanding and appreciation of them.
- 20) With regard to potential mitigation of the impact of new development on the proposal site on the settings of affected heritage assets, we believe the scope for reducing these impacts is very limited. Development and activity on the proposal site would be clearly perceptible in views from, and of, several heritage assets, notably Maiden Castle and Herringston Barrows. As well as visual impacts on static views, the proposed development will have an intrusive impact on the heritage settings through noise and activity, road lights, vehicle lights etc. In our view, tree planting along the roadside or in the development site itself would have only a superficial and inadequate screening effect, due to the limitations of trees as screening features (due to seasonal change, natural loss and timescales for replacement etc.), to the extent of the site and its topography, and the nature of the development and of activities there, (with a high degree of movement, and on-site lighting and vehicle lights etc.), and would not appreciably mitigate the impact and harm caused by the development.
- 21) Development of a P&R and TRSA on the proposal site would encroach and intrude on the existing open farmland setting of Maiden Castle, having an “urbanising effect” and an intrusive, distracting, and harmful impact on the

setting of the hillfort, thereby harming the appreciation and understanding of the monument and its heritage significance.

- 22) With regard to the historic landscape character of the area, development on the proposal site would also be a prominent and disruptive feature. It would not make a positive contribution to local character and distinctiveness, but would instead reduce the existing pastoral character and thereby the relative distinctiveness of the local landscape character area. As such it would not be in accord with NPPF para 131, which states that local authorities should take account of 'the desirability of new development making a positive contribution to local character and distinctiveness'.
- 23) **Sustainability Appraisal** - the Local Plan's SA (CD/SA1) appears to fail to comply with the EU SEA Directive - the formal assessment of the likely significant environmental effects. The SA is expected to review the impact of the plan on cultural heritage; both heritage assets and the wider historic environment, and the ability of present and future generations to enjoy and use this resource. The SA framework fails to identify the potential significant effects (positive and negative) on the historic environment (e.g. no mention is made of Maiden Castle) in relation to the park and ride and trunk road service station.
- 24) In addition there appears to be no SA of the options for either alternative park and ride or trunk road service area sites. Can it be demonstrated that all reasonable alternatives have been considered and assessed?
- 25) This point is also relevant in relation to MATTER 1: Procedural Matters and Legal Compliance including Duty to Cooperate and Sustainability Appraisal. 1.3 Is the work undertaken on Sustainability Appraisal comprehensive and compliant with legislative requirements?
- 26) **Transport assessment** - can one be assured that the Transport Analysis Guidance (DOT May 2014) including the methodology for assessing townscape, landscape and the historic environment, has been applied at this stage of the Plan to inform an understanding of the implications of this strategic allocation?
- 27) Can it be shown explicit evidence has been gathered and applied to inform a robust and objective assessment of options?
- 28) I refer to the Secretary States recent decision that under paragraph 134 of the NPPF, the benefits of a scheme including the provision of additional housing in the absence of a 5 year housing land supply, did not outweigh the less than substantial harm it would cause to the setting of a heritage asset (Wymondham Abbey). The harm would significantly and demonstrably outweigh any benefits (appeal reference L2630/A/13/2196884). We would consider that due to the national significance of Maiden Castle the harm arising from this development, particularly within the more exposed part of the site, is also not justified.

CONCLUSION

- 29) English Heritage supports 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.
- 30) In our view the application documentation under-assesses and understates the potential impact on heritage assets of the proposed development on the DOR10 site south of the Stadium Roundabout. The proposed development would constitute a significant change in the baseline setting of the most closely affected monuments, Maiden Castle, and Herringston Barrows, adversely affecting important views from and of the monuments in their landscape setting, and harming the appreciation and understanding of the monuments, their associative relationships with each other, and their relationship with the landscape. In our view there is potential for a significantly more harmful impact on the setting and significance of the designated heritage asset of Maiden Castle than is acknowledged by the proposers. The potential impact and harm to the setting and significance of these heritage assets would be significant, and in the case of Herringston Barrows potentially substantial. These are assets of the highest significance, and the more significant the asset the greater the weight that should be given to its conservation (NPPF 132). These proposals fail to give the required weight to the conservation of the affected heritage assets.
- 31) The proximity and visibility of the proposed development area in relation to the monuments at Maiden Castle and Herringston Barrows argues for avoiding development here, and seeking ways to enhance views and heritage settings and significance (for instance through hedgerow and land management initiatives), rather than increasing new development and activity within this sensitive part of the setting of the monuments.
- 32) Combining a P&R and a TRSA substantially increases the intrusive impacts, intensifying activity and operations for both components. There has been insufficient study of options for dividing these elements and locating them on different sites, and for lowering the intensity of development, with more limited facilities and a lower intensity of development and operational use.

Appendix 1

The relevant NPPF policies that EH consider the Local Plan (DOR10) is at odds with include the following:

NPPF paragraphs 7, 151

One of the core dimensions of sustainable development is the protection and enhancement of the historic environment. Local plans are expected to enable the delivery of sustainable development in accordance with the policies in the NPPF. DOR10 fails to do so.

NPPF paragraphs 157 (7th bullet)

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

DOR10 fails to sustain or enhance the significance of the affected designated heritage assets, or make a positive contribution to local character and distinctiveness, in which the heritage assets form key components.

NPPF paragraph 137

DOR10 fails to preserve those elements of the setting that make a positive contribution to the significance of the affected heritage assets, or enhance or better reveal the significance of those assets.

NPPF paragraphs 132, 133 and 134

DOR10 would have an adverse and harmful impact on the setting and significance of designated heritage assets 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 assets 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.

NPPF paragraphs 158 and 169

The Local Plan (DOR10) fails to be based on adequate, up to date and relevant evidence about the historic environment.

