

**These are informal comments from the Purbeck District Council Conservation Officer, as requested by the Mineral Planning Authority in June 2017 and based on an earlier draft of the Bournemouth, Dorset and Poole Mineral Sites Plan.**

**They were not submitted as part of a consultation exercise, and neither do they form part of Purbeck District Council's formal response to the final Pre-Submission Consultation of the Bournemouth, Dorset and Poole Draft Mineral Sites Plan.**

## **DCC Minerals site consultation – Benjamin Webb MRTPI IHBC Design and Conservation Officer Purbeck District Council**

- 1. Conservation Areas** It is a statutory duty under section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 as amended for Local Planning Authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Case law (see commentary in *Forge Fields Society v Sevenoaks DC* 2014) has confirmed that section 72 provides a strong statutory presumption in favour of preservation (i.e. doing no harm). Section 72(1) is amplified in policy terms by the National Planning Policy Framework (in particular paragraphs 132 and 137) with reference to the overlapping concept of 'significance' (heritage value), and setting. Policies LHH and D within the Purbeck Local Plan are material considerations. Conservation Area Appraisals form a key point of reference.
- 2. Non-designated heritage assets** Paragraph 135 of the NPPF directs that account should be taken of the impact of proposed works on any non-designated heritage asset. These are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. Conservation of non-designated heritage assets is also supported by Policy LHH in the Local Plan.
- 3. Setting of listed buildings** It is a statutory duty under section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 as amended for Local Planning Authorities to have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest it possesses. Case law (see commentary in *Forge Fields Society v Sevenoaks DC* 2014) has confirmed section 66(1) provides a strong statutory presumption in favour of preservation (i.e. doing no harm). Section 66(1) is amplified in policy terms by the National Planning Policy Framework (in particular paragraphs 132 and 137) with regard to the overlapping concept of significance (heritage value). Historic England advice note GPA3 provides guidance on assessment. Policies LHH and D within the Purbeck Local Plan are also material considerations.
- 4. Public benefits** Paragraphs 133 and 134 of the National Planning Policy Framework (NPPF) require broad mitigating public benefits either directly or not directly related to conservation to be balanced against this (with reference to the definition provided within National Planning Practice Guidance). Case law (see commentary in *Forge Fields Society v Sevenoaks DC* 2014 case in particular) has confirmed that regardless of the degree of

harm this balancing exercise must be carried out in light of a statutory presumption in favour of ‘preservation’ of conservation areas or setting of listed buildings under Sections 72 and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended – or conversely, the strong statutory presumption against granting permission for any development that gives rise to harm.

The following comments are also informed by Historic England Guide GPA3, which in para 12 sets out the following methodology:


**Step 1: identify which heritage assets and their settings are affected;**

**Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);**

**Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance;**

**Step 4: explore the way to maximise enhancement and avoid or minimise harm;**

**Step 5: make and document the decision and monitor outcomes.**

Site reference	Comments
AS12 – Philliol’s farm	<p>See attached plan.</p> <p>The proposed site completely encircles and runs very close to two Grade II listed agricultural buildings – a particularly impressive granary and barn of 1740s date. These are remnants of a historic farmyard group that was attached to the original Philliol’s Farm which no longer stands – see 1888 OS map extract below. The pond is shown on current maps. It is unclear what the ownership of these buildings is, or whether the promoted site is in the same ownership. The current surroundings are predominantly agricultural land and forestry and the site on which the buildings stand remains in agricultural use. There is a general sense of remoteness and tranquillity to the location.</p>  <p>The listed buildings were constructed to serve an agricultural use and their agricultural character is a key factor of their special interest/significance. The current open agricultural setting provides a degree of continuity in context, making an important and clearly perceived contribution to an appreciation of their historic functional character.</p>

High levels of Inter-visibility between the buildings and fields exist across most of the south side of the site reinforcing the relationship between the listed buildings and their immediate agricultural context.

In terms of the historic farming economy within which the buildings operated, continuing links between the historic farmstead site and the water meadows to the south are also of importance.

The outcome of a 2005 archaeological evaluation of the site is noted. This indicated high archaeological potential in the fields south and southwest of the listed buildings, the reported rarity value of which increases the level of significance.

The county HER notes a series of earthworks in the fields south west, east and south east of the farmstead, and on the north side of the road.

The proposed site extends over a wide area. Impacts would vary across the site, though *any* intensive quarrying will adversely impact upon the tranquillity and seclusion of the location. Each are positive aspects of the rural character of the locality. The most acute and direct impacts would be on the south side of the road.

- The proposed site outline includes part of the historic farmstead site as shown on the 1888 OS (blue cross hatch), destruction of which would have an adverse impact on a historic understanding of the site layout. The negative impact upon the context of the listed buildings would exist in fact regardless of its duration.
- Quarrying across most of the south side of the site would have direct visual impacts on the setting of the listed buildings and would harm appreciation within their historic and continuing agricultural context. Areas of most acute impact are marked with red stripes, this reduced slightly in red hatched areas. The negative impact upon the context of the listed buildings would exist in fact regardless of its duration.
- Given the very narrow lanes serving the locality some degree of modification may be necessary which would further harm the historic landscape surrounding the site.
- The act of excavating deep holes immediately adjacent to the listed buildings, combined with the vibration caused by the operation of heavy machinery, could potentially harm their structural stability. This likelihood is increased by the fact that they are already in fragile condition and unlikely to have any significant foundations.
- The quarrying of all the land in the immediate vicinity may cause the site to become redundant, and/or exacerbate the impact of current redundancy is would limit the prospect of any future maintenance or potential for reuse for the duration of quarrying. It is reasonable to assume that this will lead to further deterioration and potential loss of the buildings.

**Ways in which the level of harm could be reduced/mitigated**

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|  | <ol style="list-style-type: none"><li>1. On the south side of the site mitigation would not be provided by conventional means of bunding or planting tree belts along the proposed site outline as this would not conserve the positive visual and contextual contribution made by the surrounding landscape. These measures may be more suited to the north side of the site.</li><br/><li>2. In the absence of strong evidence to show necessity and an overriding degree of public benefit it is recommended that the proposal is amended to exclude the south side of the site, with possible exception of the parcel in the north west corner. This would best meet the statutory objective of preserving the setting of listed buildings.</li></ol> |
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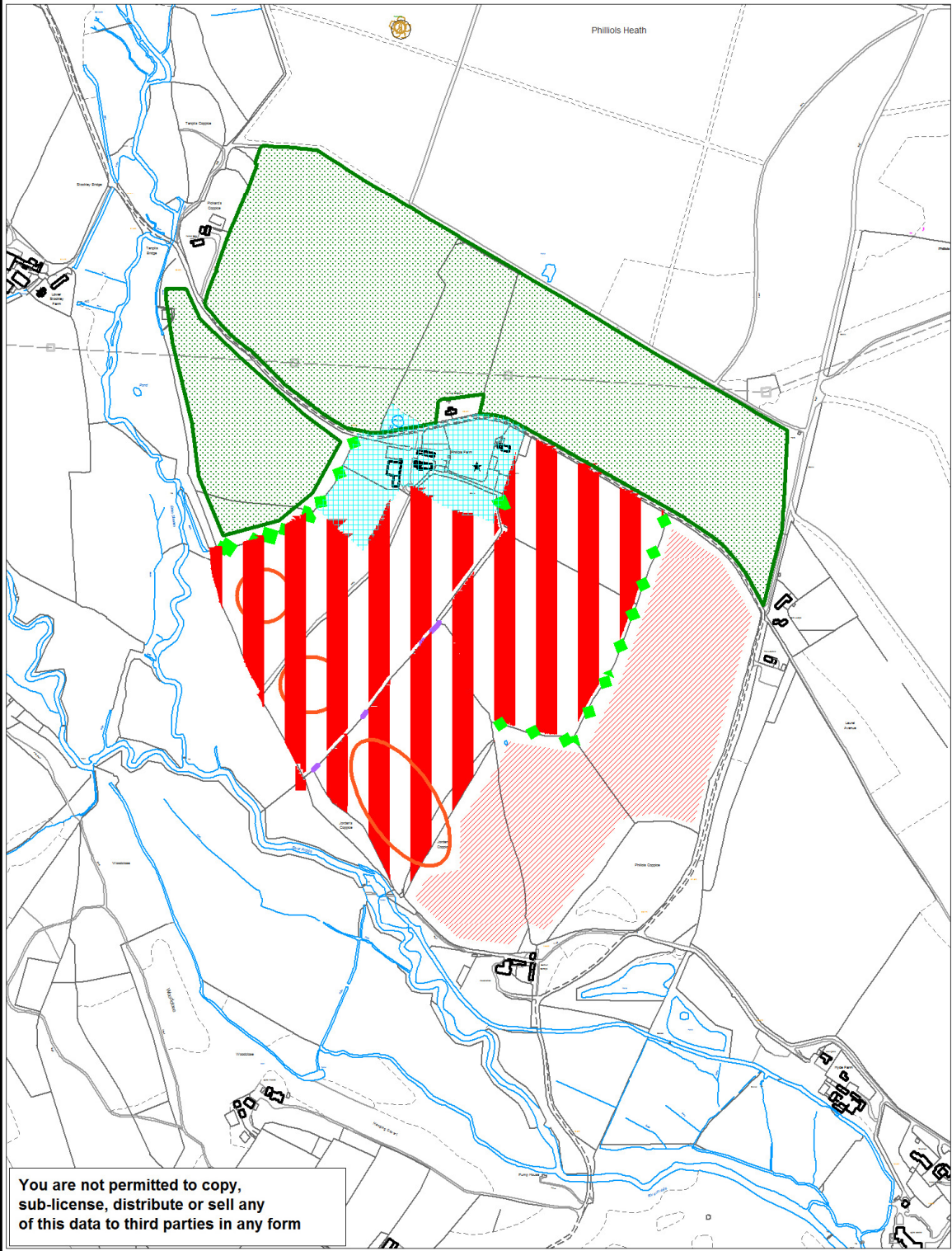
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AS12

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AS25 -  
Station Road  
Moreton

See attached plan.

The proposed site falls to the west, and immediately to the south and south west of Moreton Conservation Area. Views across the agricultural land here are allowed from Station Road and particularly appreciable during the autumn and winter months. These form an important component of the rural agricultural context of the settlement.

The site lies in close proximity to a number of Grade II listed buildings located on the north side of Station Road which form part of a planned eighteenth century agricultural settlement known as The Common.

The eastern half of the site falls within and appreciably forms a continuous part the broader landscape setting and context of Moreton House and Park. Long views across exist at many points. The west half of the site is open reflecting the fact that its improvement for agricultural use took place at a later stage than land to the east. The HER records evidence of some past use for quarrying here.

In common with other elements of the Estate landscape laid out or improved during the mid-late eighteenth century, Station Road is lined with mature oak trees as too are many of the historic field boundaries within the site. These trees are best shown on the 1888 OS map where individual specimens are plotted. This historic agricultural landscape is of high quality and has an appreciably cohesive character.

Impacts can be identified as follows:

- Destruction of historic landscape character and in particular the loss of a large number of significant, mature and irreplaceable hedgerow trees. The most significant hedgerows are marked in green. These contain many mature oak trees. Impact is greatest in the east half of the site.
- Destruction of the relatively tranquil rural setting of the conservation and listed buildings along Station Road, caused at all times by noise, and most visually intrusive during the autumn and winter when relatively clear views across the site would be allowed. Visual impact would be most acute within the red striped area, and impact generally is again greatest in the eastern half of the site.
- Adverse impact on the broader Estate landscape setting of the Moreton Park. Again most acute visually within red striped zone, though harm would extend across the whole of the hatched area. Nb. Impact on setting need not require visibility. Impact would again be greatest in the east half of the site.

- Potential structural impact on listed buildings caused by operation of heavy machinery.
- Quarrying would generate a level of noise which could be intrusive given the relative tranquillity of the location, which itself makes a positive contribution to the rural character of the conservation area.
- There could be some structural impact on Hurst Bridge resulting from increased use by heavy lorries serving the site.
- Potential destruction of a small Nissen hut adjacent to Station Road apparently left over from wartime Home Guard use.
- Some cumulative impact viewed in conjunction with AS26.

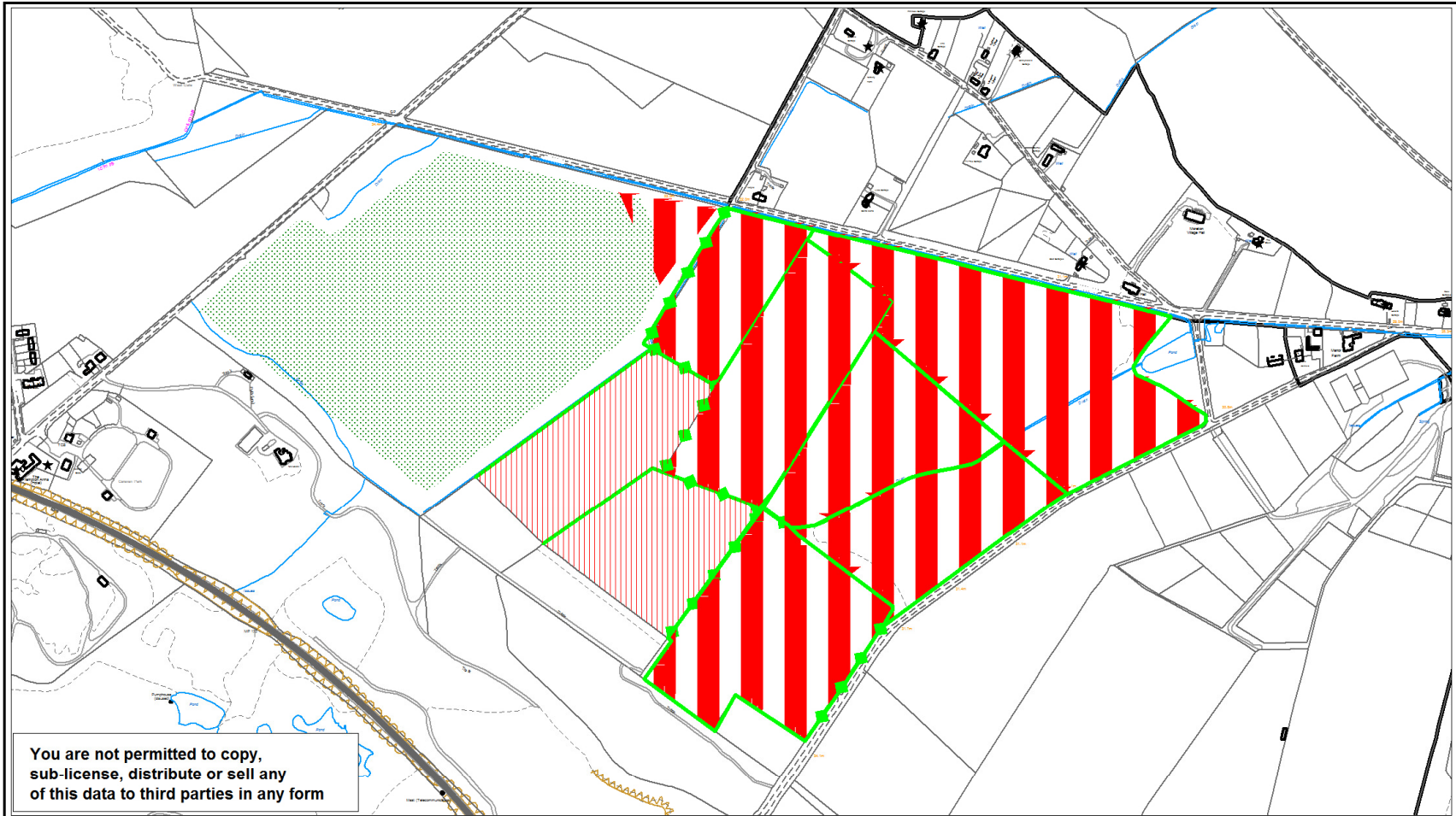
**Ways in which the level of harm to the historic environment could be reduced/mitigated:**

1. Harm would not be adequately mitigated by reinstating hedge boundaries after quarrying given that the loss of c.200+ year old hedgerow trees could not be compensated for in this way.
2. Harm would not be mitigated by bunding or increasing planting along the Station Road boundary with the conservation area or road to Redbridge. This is because each would be inconsistent with the flat enclosed agricultural character of the Estate landscape and the positive historic and visual contribution to the setting and context of both the conservation area and more broadly, Moreton Park, this makes. Maintenance of views is important in this regard.
3. Limiting quarrying to the open western half of the site (green shading) would avoid the most direct impacts on the setting of heritage assets and historic landscape character, particularly if buffered in the north east corner of the field and elsewhere (green dots) by establishment/reestablishment or improvement of field boundaries. There may also be scope to extend the existing tree belt in the north west corner, particularly in view of the wooded character of land on the opposite side of Station Road. Intrusion from noise and some visual intrusion on the approach to the conservation area would however remain.
4. Quarrying the eastern half of the site would entail heritage impacts which would be most acute within red striped areas given these are zones of greatest visibility and in greatest proximity to designated areas. In most cases existing hedgerow boundaries and trees, including potentially reinstated and repaired hedgerow boundaries

(dotted green), provide some seasonal screening of longer views but most are nonetheless somewhat gappy. In the absence of strong evidence to show necessity and an overriding degree of public benefit it is recommended that the proposal is amended to exclude these areas.

5. Adverse heritage impact would also exist within the hatched red areas which contain both historic field boundaries and mature trees and form a continuous component of the historic Estate landscape. Again there would be some degree of seasonal visibility and intrusion from noise. The impact of quarrying here would however be moderately less than in striped areas on account of reduced proximity and visibility. It is recommended that the proposal is amended to also exclude these areas, though it is accepted that harm caused by quarrying within them could be mitigated to some extent by repair, restoration and reinstatement of field boundaries (dotted), retention of significant trees and boundaries within the site (marked green), and full repair and reinstatement of field boundaries upon site restoration. The very delicate and spatially limited operation this would require may not however be achievable in practice.
6. Structural investigation and monitoring of Hurst Bridge would be essential.






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**AS25**

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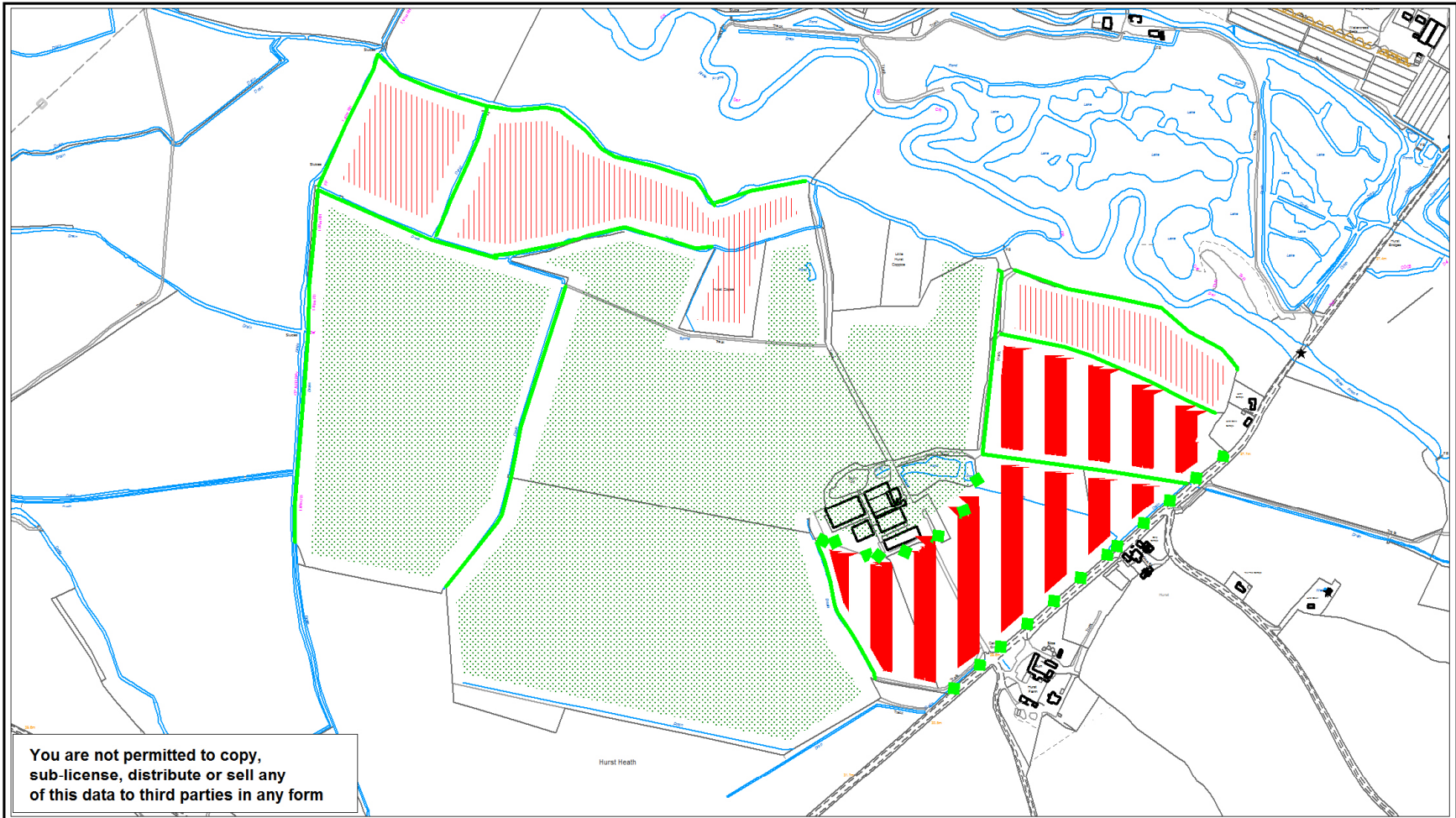
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<p>AS26 – Hurst Farm</p>	<p>See attached plan.</p> <p>The proposed site forms part of the immediate setting of listed buildings at Dairy Cottage which stand opposite the site and broader setting of listed cottages at Hurst Green.</p> <p>The proposed site forms an aspect of the historic landscape of the Moreton Estate.</p> <p>In common with other elements of the Estate landscape laid out or improved from the mid-late eighteenth century onwards, historic field boundaries within the site contain large numbers of mature oak trees. The most historic boundary is the rough half circle enclosing space between the B3390 and existing agricultural buildings. Other notable field boundaries exist to the north and north east of the site which for the most part appear to trace channels related to past water meadow use.</p> <p>Hurst Bridge may be affected by increased movement of heavy lorries serving the site.</p> <p>The HER shows that part of the site was historically operated as an element of the extensive system of water meadows along the river valley. Historic water meadows are a landscape type of heritage interest and can potentially be considered ‘non-designated heritage assets’ where not otherwise designated.</p> <p>Impacts can be identified as follows:</p> <ul style="list-style-type: none"> <li>• Potential structural harm to Hurst Bridge as a result of increased use by heavy lorries.</li> <li>• Destruction of historic Estate landscape character, in particular the loss of a large number of significant, mature and irreplaceable hedgerow trees. The most significant boundaries are marked green.</li> <li>• The loss of historic watercourses related to past use of the land as water meadows, and loss of other evidence conserved within the field boundaries and identified within the HER. Impact would be greatest in red hatched areas.</li> <li>• Destruction of a copse perhaps originally planted to provide cover for game, and as such a socially significant element of the historic Estate landscape.</li> <li>• Adverse visual impact on the setting/context of listed buildings whose appreciation would be compromised by quarrying immediately opposite.</li> <li>• Some cumulative impact viewed in conjunction with AS25.</li> </ul>
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**Ways in which the level of harm to the historic environment could be reduced/mitigated:**

1. Harm would not be adequately mitigated by reinstating field boundaries after quarrying given that the loss of mature hedgerow trees could not be compensated for in this way.
2. Visual impact and harm to context would be greatest within the red striped area. Retaining spaces between the B3390 and existing agricultural buildings (the buildings themselves are not important) together with the enclosing hedges would both conserve the boundary and provide some buffering for listed buildings opposite. Boundaries could be repaired and improved, including that along the B3390. If the farm buildings were removed a new boundary could be introduced here. Planting of new hedgerow oaks could make a valuable contribution.
3. The most archaeologically sensitive parts of the historic water meadows could be excluded.
4. Adoption of a quarry strategy which conserved key field boundaries and ditches would avoid harm to these features. The large field spaces enclosed across the centre of the site may make this achievable, though fields across the north of site may be too small to access and are otherwise sensitive.
5. Hurst Copse could be left intact.
6. Structural investigation and monitoring of Hurst Bridge would be essential.



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AS26

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AS10 –  
Moreton  
Plantation

The proposed site incorporates Moreton Drive which is a historic feature of the designed landscape setting of Moreton House – a Grade II\* listed building. This may have been first established during the mid-eighteenth century, a period during which the estate landscape underwent considerable modification and many plantations were first established on heathland. The 1888 OS shows that a lodge was located at the entry on Puddletown Road. Moreton Drive branches closer to Moreton and directly runs to the house.

In common with other parts of the historic Moreton Estate landscape, parts of Puddletown Road is lined by mature oak trees.

The site incorporates Clouds Hill which is site of scheduled barrows and a wood bank noted in the County HER. Clouds Hill Cottage, a Grade II listed building, is close by. A relatively undisturbed and tranquil setting makes an important contribution to the appreciation of the barrows and some contribution to that of the cottage.

Oker's Wood Cottage lies opposite the north east corner of the site. This building remains listed though has been rebuilt. It is otherwise heavily screened.

More generally the land within the plantation is an important recreational resource.

Impacts can be identified as follows:

- Loss of tranquillity/seclusion around Cloud's Hill. Though already compromised to some extent by roads and a house the quarrying around Cloud's Hill would have an impact on appreciation of heritage assets at and around this location viewed within their context as historic landscape features.
- Destruction of an important element of the historic designed landscape/estate setting of Moreton House. This would arise were Moreton Drive to be quarried or lost as a result of the work, or if the topography or alignment of the route was to be changed. The impact would arise in fact regardless of its duration.
- Potential loss of historic landscape planting along Puddletown Road.
- Displacement of recreational users. This is a broad impact I have been asked to highlight within the context of heathland protection. The displacement of recreational users of the plantation may have an adverse impact upon fragile heathland sites in the broader area. This would run counter to the general planning objective of mitigating such impact

	<p>by providing alternative recreational space (SANGS) where development occurs.</p> <p><b>Ways in which the level of harm to the historic environment could be reduced/mitigated:</b></p> <ol style="list-style-type: none"> <li>1. Exclude Moreton Drive from the site and allow a reasonable buffer either side for retained and new planting. The effectiveness of this strategy would vary with ground levels.</li> <li>2. Exclude the north east corner of the site allowing a buffer around Cloud's Hill. This would help to conserve the setting of the barrows and the broader setting of Cloud's Hill Cottage.</li> <li>3. Retain a deep buffer along Puddletown Road conserving historic trees and providing screening. Planting new roadside oaks could bring some benefit.</li> </ol> <p>The impact on recreational use could be managed by phased quarrying and restoration so that public access to large parts of the site is permanently maintained, and access to those parts improved.</p>
<p>BC04 – Trigon Hill Extension</p>	<p>The site incorporates the driveway and elements of landscape planting associated with Trigon House, a Grade II listed building. In a broad sense there would be an impact on the setting of Trigon House given the destruction of part of the designed landscape with which it is associated.</p> <p>The site would also impact on the setting of a barrow. It is noted that existing quarry operations have already caused harm. Adverse cumulative impacts need to be taken into account.</p> <p><b>Ways in which the level of harm to the historic environment could be reduced/mitigated:</b></p> <ol style="list-style-type: none"> <li>1. Exclude the drive from the site area.</li> <li>2. Leave a deep buffer of existing planting along the drive, and along the south side of the site.</li> <li>3. Reinststate the remainder of planting when the site is restored.</li> </ol>
<p>BC05 – Dorey's Holme Heath</p>	<p>Map does not show East Holme Conservation Area</p>
<p>AS28a – Gallows Hill</p>	<p>The site contains WWI practice trenching which is of historic/archaeological interest. See HER.</p>
<p>PK02 - Blacklands</p>	<p>The map does not show Acton Conservation Area. There would be some impact on setting, partly cumulative, and quarrying would</p>

	<p>move closer to conservation area boundary. In view of extensive (albeit less intensive) historic, and extant quarrying in the immediate locality however, and the role of Acton as a historic quarry settlement no objection is raised on grounds of impact on setting in principle.</p> <p>Given the proximity of other proposed sites and sites already permitted impact would be managed by ensuring that all sites do not operate at the same time.</p> <p>Reinstatement as grassland would be more desirable than retention of a void. This would better reflect the character of the surrounding historic quarried landscape.</p>
<p>PK18 – Quarry 4</p>	<p>The map does not show Acton Conservation Area. There would be some impact on setting, partly cumulative, and quarrying would move closer to conservation area boundary. In view of extensive (albeit less intensive) historic, and extant quarrying in the immediate locality however, and the role of Acton as a historic quarry settlement no objection is raised on grounds of impact on setting in principle.</p> <p>Given the proximity of other proposed sites and sites already permitted impact would be managed by ensuring that all sites do not operate at the same time.</p> <p>It is noted however that the linear boundary on the east side of the proposed area holds considerable historic interest. This is an important landscape feature which extends beyond the confines of the site and forms one of a sequence of similar boundaries between Worth and Swanage. The same line forms the eastern boundary of the conservation area. This boundary should not be destroyed.</p> <p>Reinstatement as grassland would be more desirable than retention of a void. This would better reflect the character of the surrounding historic quarried landscape.</p>
<p>PK17 – Home Field</p>	<p>The map does not show Acton Conservation Area. There would be some impact on setting, partly cumulative, and quarrying would move closer to conservation area boundary. In view of extensive (albeit less intensive) historic, and extant quarrying in the immediate locality however, and the role of Acton as a historic quarry settlement no objection is raised on grounds of impact on setting in principle.</p> <p>The HER notes some presence of prehistoric field boundaries in this location. There would therefore be archaeological impacts which require further investigation.</p>

	<p>Given the proximity of other proposed sites and sites already permitted impact would be managed by ensuring that all sites do not operate at the same time.</p> <p>As with site PK18 the proposed site would have some potential impact on historic boundaries including that of Priest's way and linear boundary on the west side of the site. These boundaries should be conserved.</p>
AS09 – Hurn Court	<p>Kingston Conservation Area is not shown.</p> <p>The quarry and restoration strategy here should take account of the need to conserve and reinstate drystone walls. These are features of historic interest and play an important role within the historic cultural landscape of the AONB.</p>
PK19 - Broadmead	Acton Conservation Area not shown.
PK21 – Gallows Gore	Acton Conservation Area not shown.



