

Bournemouth, Dorset and Poole Minerals Sites Plan

Site AS25: Station Road, Moreton

Introduction

1. The Pre-Submission Draft of the Minerals Sites Plan 2017 includes land at Station Road, Moreton as one of the proposed allocated sites for sand and gravel extraction.
2. This Statement sets out the approach proposed by the Mineral Planning Authority with regard to appropriate protection of the cultural heritage interest at the AS25 Station Road site. The Agents for the Moreton Estate have seen and commented on an earlier draft of this statement.
3. One of the key comments made by the Agent is that any amendments to the site boundaries as shown in the Pre-Submission Draft of the Mineral Sites Plan should only be made on the basis of robust and comprehensive evidence, such as that which would be necessarily collated as part of the relevant environmental impact assessments at the planning application stage.

Informal Comments of the Purbeck District Council Conservation Officer on AS25 Station Road.

4. In June 2017 the Purbeck District Council Conservation Officer was invited to comment of the proposed site allocation. His comments, illustrated by a plan, are set out (in italics) below. They did not form part of a formal 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.

Purbeck District Council Conservation Officer comments on AS25 Station Road:

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:

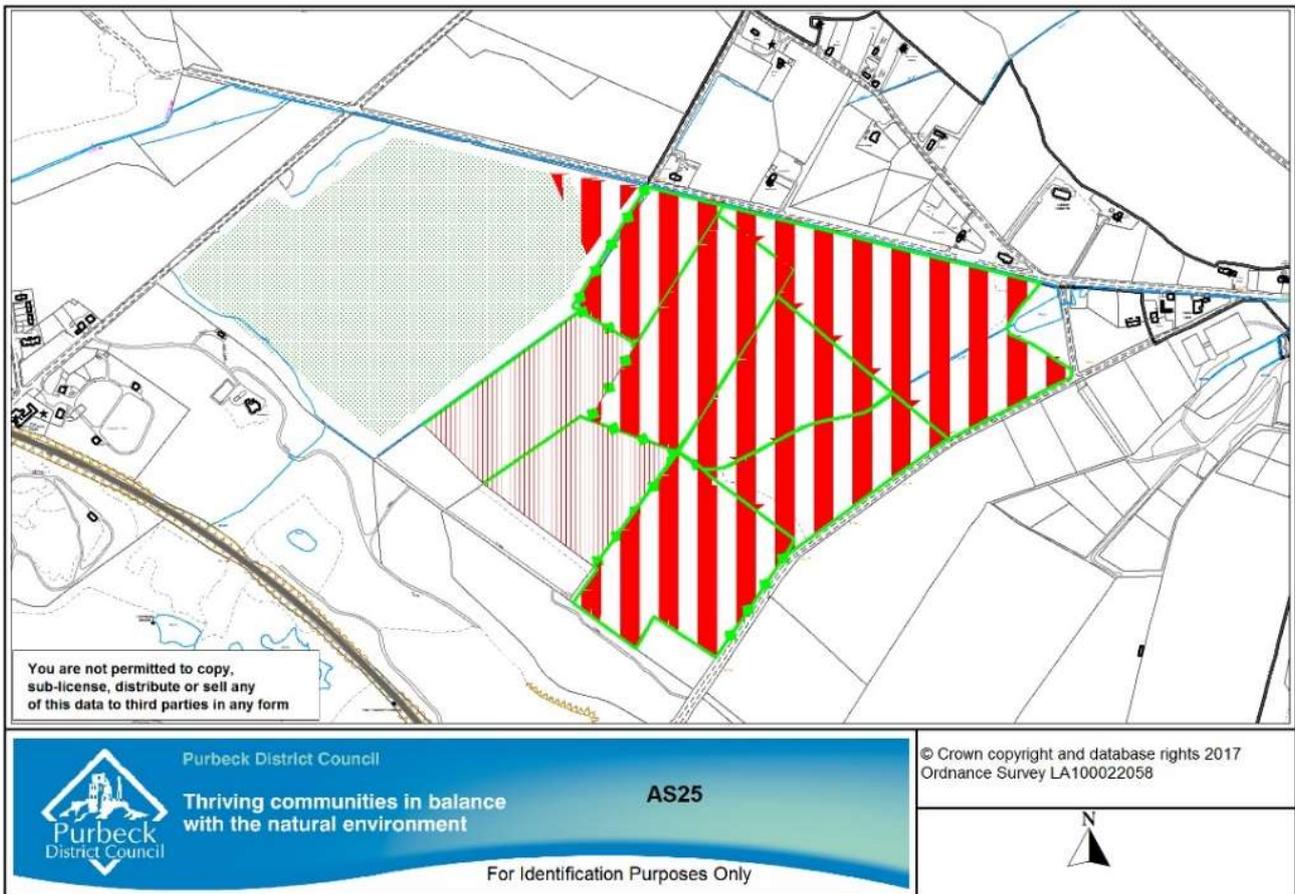
- i. Destruction of historic landscape character and in particular the loss of a large number of significant, mature and irreplaceable hedgerow trees. The most significant hedgerows are marked in green (see plan below). These contain many mature oak trees. Impact is greatest in the east half of the site.*
- ii. Destruction of the relatively tranquil rural setting of the conservation area 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 (see plan below), and impact generally is again greatest in the eastern half of the site.

- iii. 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 (see plan below). NB: Impact on setting need not require visibility. Impact would again be greatest in the east half of the site.*
- iv. Potential structural impact on listed buildings caused by operation of heavy machinery.*
- v. 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.*
- vi. There could be some structural impact on Hurst Bridge resulting from increased use by heavy lorries serving the site.*
- vii. Potential destruction of a small Nissen hut adjacent to Station Road apparently left over from wartime Home Guard use.*
- viii. Some cumulative impact viewed in conjunction with AS26.*

Conservation Officer view on ways in which the level of harm to the historic environment could be reduced/mitigated:

- i. 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.*
- ii. 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.*
- iii. Limiting quarrying to the open western half of the site (green shading) (see map below) 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.*
- iv. Quarrying the eastern half of the site would entail heritage impacts which would be most acute within red striped areas (see map below) 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.*
- v. 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.*
- vi. Structural investigation and monitoring of Hurst Bridge would be essential.*



MPA Response

5. The MPA recognise the heritage interest in this proposed allocation, and commissioned Context One consultants to carry out Heritage Assessment of the proposed allocation and surroundings. Preliminary Heritage Assessment was carried out (see MSDCC 37 and 41 on the Dorset County Council Mineral Sites Plan Examination website¹) and identified a range of heritage assets in the vicinity of the site. A more detailed Heritage Assessment was subsequently carried out ([MSDCC - 74b](https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/dorset-county-council/minerals-planning-policy/mineral-sites-plan/mineral-sites-plan.aspx)²) looking at heritage assets in the area, particularly the Moreton Conservation Area and the Listed Buildings to the north of Station Road.
6. The conclusions of this more detailed assessment, from the Context One report, are set out below, in italics:

It is clear that neither of the Listed buildings of the highest significance within the 2km research radius, the parish church and Moreton House, have a direct relationship with the Site, being screened by the interposed buildings and woodland. The only connection is that the land covered by the Site is part of the historic landscape which emerged from developments of the 18th and 19th century associated with the Moreton Estate; as such any concerns relating to these apply equally to the situation of the Conservation Area. Of the remaining heritage assets, the majority are both distant from the Site and screened by interposed and extensive vegetation, in particular within the central and eastern part of the Moreton Conservation Area. The proposals would not produce any harm to the setting or significance of designated assets in the centre of the village, including the New Cemetery and Lawrence’s grave. In actuality, a direct visual relationship only occurs between the Site

¹ See: <https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/dorset-county-council/minerals-planning-policy/mineral-sites-plan/mineral-sites-plan.aspx>
² See: <https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/dorset-county-council/pdfs/planning/msp-hearing-docs/msdcc74b-station-road-heritage-impact-assessment-v2.pdf>

and the southern part of the western zone of the Conservation Area where it fronts onto Station Road. This also applies to the two Grade II Listed buildings in this area, East Cottage and Lilac Cottage/Santa Maria.

The significance of East Cottage and Lilac Cottage/Santa Maria is based on the evidential value of their fabric, and their historic relationship to the layout of the Moreton Estate. The historic layout and structure of the landscape and the buildings within it, which chart the changes and the planned development of the Moreton estate from the 18th century onwards, in turn lend significance to the Moreton Conservation Area. The fabric of East Cottage and Lilac Cottage/Santa Maria will not be directly affected by the proposed development on the Site. However, detailed consideration of the relationships between these heritage assets and the Site has concluded that there are glimpsed views of the Site from both the Listed buildings and the Moreton Conservation Area, and multiple viewpoints along Station Road in this area where the Site and the assets can be seen in relation, albeit as glimpses. Whilst views are not apparently reciprocal from the north part of the Site, and the main aspects of these properties do not face the Site, there is potential, especially in winter for there to be a change to the middle distance legibility of the historical agricultural setting. This would be created by the loss of the internal boundaries in this part of the Site with their mature trees. The ambience and soundscape of both the Moreton Conservation Area and East Cottage and Lilac Cottage/Santa Maria is currently rural and tranquil and intrusive noise is contributed by local vehicle and agricultural traffic and equipment. It is possible that noise, dust and odours may also affect these assets at this separation distance from the proposed northern boundary of the Site. Therefore, in these cases it has been determined that there will be change to the setting, and because of the specific relationship of these buildings to the immediate landscape layout, this would likely constitute less than substantial harm to their significance. Mitigation might be provided by way of removing the north-east part of the scheme, that is the remainder of the north-easternmost field. This would create a greater separation from the northernmost edge of the proposed area, have the advantage of retaining the line of mature hedge and deciduous trees which form part of the middle distance view, and reduce the potential impact of noise, dust and odours by providing an additional screen between the Site and Station Road. Retention of this field boundary would also preserve more of the historic 18th and 19th century land form, and landscape organisation.

It is noted that the exact impact on heritage assets will depend on the eventual sequence and methods of extraction. However, on balance it is considered that impacts can be minimised during the extraction phase by employing of parcel by parcel extraction. The avoidance of tall spoil dumps during the extraction process would reduce these particularly visually intrusive additions to views or appearance of a scarred landscape. It is suggested that in order to mitigate impacts from noise, vibration and dust on the Moreton Conservation Area in general and East Cottage and Lilac Cottage/Santa Maria in particular, it would be beneficial to move the north-eastern boundary back to the next field boundary to the south, which incorporates a line of mature trees. Further detailed consideration should be undertaken with respect to these aspects as part of a planning application process.

Given the historic nature of the system of boundaries within the Site, and the degree to which these relate to the 18th and early 19th century development of the Moreton Estate as reflected within the Conservation Area, it would be desirable to maintain as much of these as possible. It would certainly be necessary to reinstate those which have to be removed after completion of extraction. This would mitigate the long-term effects on setting, even if the landform is permanently altered and would be essentially a reconstruction. Many aspects of the likely impacts will be temporary in nature and limited to the period of active extraction, albeit that this may last for some years, if not decades. However, these will not create permanent change to setting. However changes to the current land form would be permanent, although this could be remedied with respect to the visual impact by sympathetic restoration. A full photographic and topographic survey should be considered in advance of the extraction to record the existing landscape and facilitate the restoration. It is however particularly desirable to avoid the worst of these impacts at the eastern end of the

Site. Consequently, restoration plans would need to take this into account and be agreed in order to provide some compensative mitigation.

This approach would address many of the concerns voiced in the Conservation Officer's unofficial comments. In addition, appropriate evaluation and mitigation in relation to the archaeological potential of the Site may provide the opportunity for greater understanding of the post-medieval estate development in this area by elucidating the creation, use and abandonment of the farm holding in the middle of the Site as shown on the mid-19th century maps.

Historic England Response to the Mineral Sites Plan Pre-Submission Consultation

7. Historic England made the following response in January 2018 to the 2017/2018 Pre-Submission Consultation on the Mineral Sites Plan.

We note, and appreciate, the [Purbeck] Conservation Officer's particular concern regarding Philliol's Farm (AS-12), Woodsford Quarry (AS-19), Station Road, Moreton (AS-25), and Hurst Farm, Moreton (AS-26).

Has the local authority considered small plot phased extraction within these very large sites to reduce the impact on the landscape, and allow a more sensitive, responsive managed release of sites that can enable the conservation of, for example, ancient trees and hedgerows, important features within the historic landscape? Historic England would welcome the opportunity to discuss such potential measures, and others to reduce the level of harm to the significance of the historic environment.

8. A subsequent email from Historic England dated 16th August 2018 included the following:

Historic England have previously acknowledged the validity of the comments and recommendations provided by the former Purbeck CO and therefore it was felt to be reasonable to expect a consideration and response to those matters and in so doing accord with the expectations of national planning policy.

Station Road. *The comments of the former Purbeck CO and the Context One demonstrate the considerable harm that is likely to occur unless a moderated and conditioned proposal is forthcoming - is the LA able to positively respond and ensure:*

- i. parcel by parcel extraction*
- ii. retention of historic hedged boundaries, ditches and mature trees which both screen and are clearly of historic landscape significance*
- iii. address the recommendations re Hurst Bridge and other matters set out in the Context One report.*

The next steps would be to clearly set out how you (the LA) can positively respond to the evidence gathered and in so doing accord with national policy. A positive response to both sites may help to limit a cumulative impact/harm.

Proposed Mitigation to address Historic England concerns

9. The Context One assessment has identified an approach to mineral extraction which could address the impacts identified by the Conservation Officer, including:
- i. Particularly avoiding the worst of any impacts at the eastern end of the Site. In order to mitigate impacts from noise, vibration and dust on the Moreton Conservation Area in general and East Cottage and Lilac Cottage/Santa Maria in particular, it would be beneficial to move the north-eastern boundary of the proposed site back to the next field boundary to the south, which incorporates a line of mature trees;*
 - ii. Given the historic nature of the system of boundaries within the Site, and the degree to which these relate to the 18th and early 19th century development of the Moreton Estate as*

reflected within the Conservation Area, these boundaries should be maintained as far as possible through;

- a. Employing parcel by parcel extraction of the mineral, and leaving the hedgerow and tree boundaries intact as far as possible;*
 - b. In cases where the removal of boundaries cannot be avoided, reinstating those boundaries which have to be removed after completion of extraction.*
 - iii. Avoidance of tall spoil heaps or stockpiles on the site during the extraction process to reduce the appearance of a scarred landscape;*
 - iv. Undertaking a full photographic and topographic survey in advance of the extraction to record the existing landscape and facilitate the restoration. Restoration plans should take this into account and be agreed in order to provide some compensative mitigation.*
10. The MPA consider that measures such as these would mitigate the long-term effects on setting, even if the landform is permanently altered and would be essentially a reconstruction. Many aspects of the potential impacts will be temporary in nature and limited to the period of active extraction, albeit that this may last for some years. However, these will not create permanent change to setting, while changes to the current land form would be permanent, although this could be remedied with respect to the visual impact by sympathetic restoration.

Implementing these mitigation actions

11. The MPA recognise the importance of mitigating potential impacts on heritage interests in the vicinity of the site, particularly the Conservation Area and the two Listed Buildings.
12. One option would be to include a more generalised Development Guideline (DG) in the MSP, noting the potential for heritage impacts and requiring a detailed Heritage Assessment in support of any future planning application to identify these impacts along with appropriate mitigation to address the identified impacts.
13. The preference of the MPA is to keep the DGs as guidelines, and avoid being overly prescriptive in terms of actions required. However, in a sensitive case such as this proposed allocation, the MPA consider that it is appropriate to be more prescriptive.
14. Therefore, it is proposed to add a DG requiring a detailed Heritage and Setting Assessment, with mitigation to be identified and implemented, as follows:
 - 1. In order to mitigate impacts from noise, vibration and dust on the Moreton Conservation Area in general and East Cottage and Lilac Cottage/Santa Maria in particular, the north-eastern boundary of the proposed site will be moved back (southwards) to the next field boundary to the south, which incorporates a line of mature trees, unless it can be demonstrated following further detailed assessment that some part of this field can be worked without causing unacceptable impacts on heritage interests;*
 - 2. Given the historic nature of the system of field boundaries within and around the Site, and the degree to which these relate to the 18th and early 19th century development of the Moreton Estate as reflected within the Conservation Area, these boundaries should be maintained as far as possible through;*
 - a. Employing parcel by parcel extraction of the mineral, and leaving the hedgerow and tree boundaries intact as far as possible;*
 - b. In cases where the removal of boundaries cannot be avoided, reinstating those boundaries which have to be removed after completion of extraction.*

The further detailed assessment will identify which boundaries will be kept, and which will be removed.
 - 3. Visually intrusive mineral/soil/spoil dumps will be avoided during site preparation, working and restoration;*

4. *Undertaking a full photographic and topographic survey in advance of the extraction to record the existing landscape and facilitate the restoration. Restoration plans should take this into account and be agreed in order to provide some compensative mitigation.*
5. *Hurst Bridge will be subject to on-going monitoring, following detailed structural recording and examination by a structural engineer;*
6. *There will be appropriate evaluation and mitigation in relation to the archaeological potential of the site, to provide the opportunity for greater understanding of the post-medieval estate development.*

Archaeology

15. It is acknowledged that there is potential for there to be buried archaeology within the site. The MPA are satisfied that Policy DM7 of the 2014 Bournemouth, Dorset and Poole Minerals Strategy and the provisions of the National Planning Policy Framework 2018 are sufficient to appropriately protect archaeology on the site.

Bournemouth, Dorset and Poole Minerals Strategy:

'Policy DM7 - The Historic Environment

Proposals for minerals development in Bournemouth, Dorset and Poole will only be permitted where it can be demonstrated through an authoritative process of assessment and evaluation that heritage assets and their settings will be conserved in a manner appropriate to their significance. Adverse impacts should be avoided or mitigated to an acceptable level. Where the presence of historic assets of national significance is proven, either through designation or a process of assessment, their preservation in situ will be required. Any other historic assets should be preserved in situ if possible, or otherwise by record.'

16. The MPA considers that this approach addresses the point raised regarding the derelict Nissen buildings in the north-eastern field, referred to by the Purbeck Conservation Officer and now proposed to be left unaffected.
17. The MSP - Station Road site allocation - includes a DG requiring archaeological assessment and evaluation.

Conclusion

18. The MPA consider that the safeguards available through National Policy, Policy DM7 of the Minerals Strategy 2014 and the proposed DGs as modified provide an appropriate level of protection to the heritage interests in and around the proposed allocation.