

Bournemouth, Dorset and Poole Minerals Sites Plan

Site AS26: Hurst Farm, Moreton

Introduction

1. The Pre-Submission Draft of the Bournemouth, Dorset and Poole Minerals Sites Plan 2017 includes land at Hurst Farm, 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 AS26 Hurst Farm 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 AS26 Hurst Farm.

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 AS26 Hurst Farm:

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.

The proposed site forms an aspect of the historic landscape of the Moreton Estate.

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.

Hurst Bridge may be affected by increased movement of heavy lorries serving the site.

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.

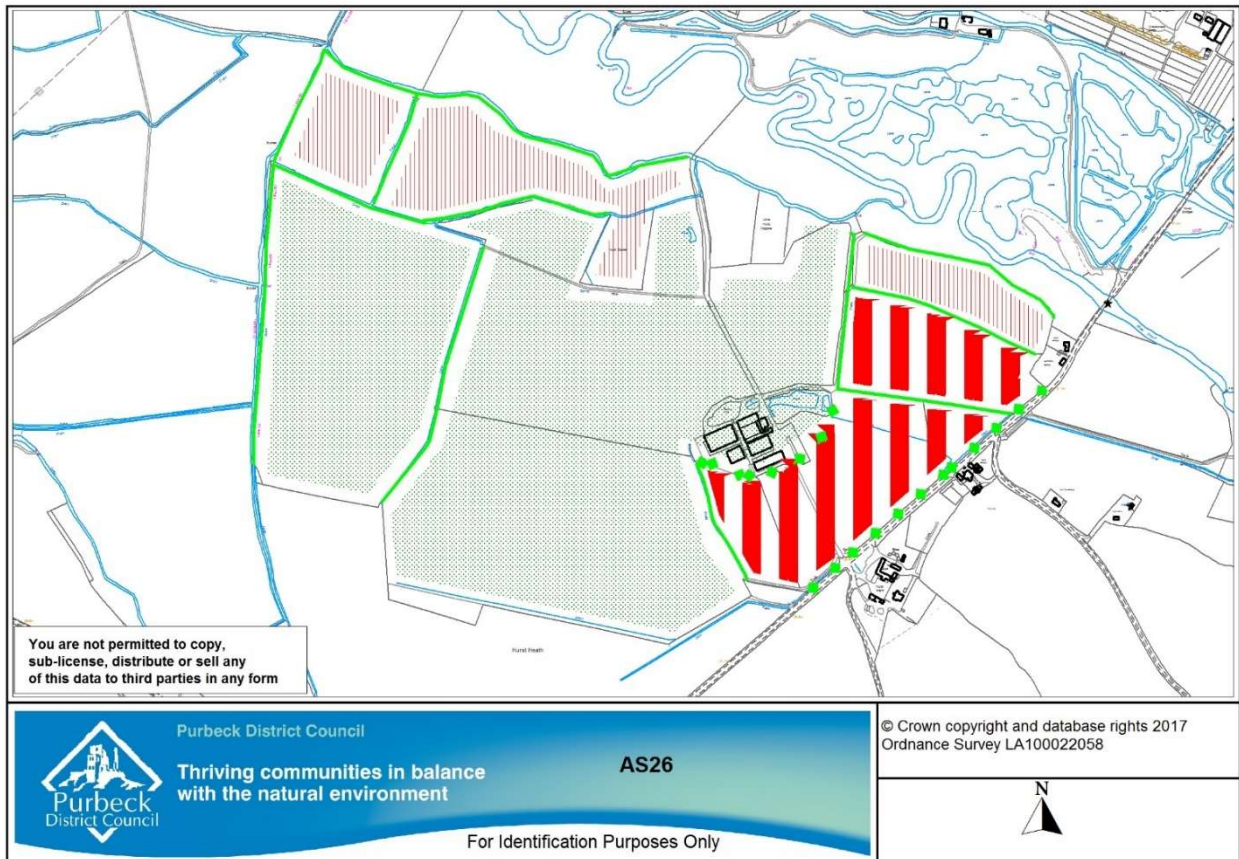
Impacts can be identified as follows:

- i. Potential structural harm to Hurst Bridge as a result of increased use by heavy lorries.*
- ii. 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 (see map below).*
- iii. 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 (see map below).*
- iv. Destruction of a copse perhaps originally planted to provide cover for game, and as such a socially significant element of the historic Estate landscape.*

- v. *Adverse visual impact on the setting/context of listed buildings whose appreciation would be compromised by quarrying immediately opposite.*
- vi. *Some cumulative impact viewed in conjunction with AS25.*

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 field boundaries after quarrying given that the loss of mature hedgerow trees could not be compensated for in this way.*
- ii. *Visual impact and harm to context would be greatest within the red striped area (see map below). 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.*
- iii. *The most archaeologically sensitive parts of the historic water meadows could be excluded.*
- iv. *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.*
- v. *Hurst Copse could be left intact.*
- 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 42 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 - 73²](#)) looking at heritage assets in the area.
6. The conclusions of this more detailed assessment, from the Context One report, are set out below, in italics:

There are around 40 designated heritage assets within a 2km radius of the Site. Of these, the majority are Listed buildings, all Grade II. Of these ten are within 500m of the Site, including Hurst and Hurst Bridge, immediately to the east of the Site, and Pallington, c. 400m to the north. The majority of the rest of the Listed structures are situated c. 0.5-2km to the south-east of the Site within the village of Moreton and associated with the Moreton Conservation Area. Additional groups are associated with The Frampton Arms c. 1.5km to the south-west, adjacent to Moreton station, The Frome Bridge, c. 1.9km to the west, and Eweleaze c. 2km to the north-west. In addition, there are three Scheduled Monuments situated on the ridge c. 1.8km to the north of the Site at Pallington Heath. These comprise a total of six Bronze Age barrows. The considerable amount of mature woodland, hedgerows and single field trees across the area interrupts views of, and within, the Site, and result in a more limited number of assets having actual inter-visibility with it. Therefore, three areas with designated heritage assets were selected for detailed consideration: the Moreton Conservation Area to the south-east, Hurst, immediately to the east of the Site and Hurst Bridge to the north-east; and Pallington to the north.

Considering the relationship of the Site with these assets it was clear that the majority have no relationship with it, being screened by hedges and trees. Of the remaining assets, the majority, particularly in the case of Moreton Conservation Area and its associated heritage assets, were distant from the Site and screened by interposed extensive vegetation, although they can be experienced within broader and long-distance landscape views. There was however a direct relationship between the Site and the Grade II Listed Hurst Dairy House and its barn which lie immediately to the east of the B3390 at the east end of the Site and which have a historical relationship with the Site.

The significance of Hurst Dairy House and its associated barn is invested in their fabric as agricultural buildings which were directly associated with the development of the landscape for dairy production. This seems to have been integral to the re-organisation of the Moreton Estate during the later 18th and 19th centuries. There is a clear historical, functional and visual connection between Hurst Dairy House and its barn, and the Site, particularly its eastern extent. The non-designated water meadows in the north-western part of the Site were an integral part of the dairying regime of the area and are therefore directly related to the function and significance of the Hurst Dairy House and barn. Whilst the current condition and use of the Dairy House compromises its legibility as part of the farming landscape, and it is separated from the Site by an already busy road, both the eastern area of the Site and the Hurst assets can be experienced in kinetic views along the B3390. There would appear therefore to be the potential for harm to occur to the setting of both of these Grade II Listed buildings. In addition, there is a greater likelihood of intrusive noise from the works, as well as the possibility of dust, vibration and noise from the increase in heavy vehicles using the B3390 to access the A35. It was considered that the changes to the setting of these assets, and thereby their significance, would constitute less than substantial harm. The loss of the water meadows would constitute a specific change to setting which would directly impact on the

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/dba-18-dmw-hurst-farm-heritage-impact-assessment-reduced-size.pdf>

significance of the Hurst Dairy House but would provide the opportunity to undertake a detailed examination of this part of the meadows. This would enhance understanding of the chronological and technological development of this important Dorset landscape feature.

With respect to Hurst Bridge and other Listed assets on the B3390 to the north-east of the Site, it was considered that there was some likelihood of additional noise, vibration or dust from the working of the Site to affect these assets, but there was no inter-visibility. However, the routing of additional heavy traffic up the B3390 could have a potential impact on Hurst Bridge in particular and possibly on other roadside assets. This was considered to constitute less than substantial harm to Hurst Bridge, which could be mitigated by detailed structural recording, examination by a structural engineer and on-going monitoring.

Mitigation which could be considered with respect to the buildings at Hurst could include moving the eastern Site boundary from along the side of the B3390 to the west, to provide a buffer of at least 100m. This would retain the close views of Hurst Dairy House and barn would remain unchanged and retain the historic landform. It would also reduce impacts from noise, vibration and dust. A programme of archaeological fieldwork to record the area of the water-meadows would enhance understanding of their relationship with the designated assets and support their significance. Avoidance of creating high and visually intrusive spoil dumps during the works would also be important in not introducing an alien element into the flat landscape. In addition, retention of hedged boundaries which contain mature trees to provide visual screening and dampen noise would also retain the historic and planned nature of this part of the Moreton Estate. This retention would also mitigate any changes to the middle and longer distance visual setting of the Listed buildings at Pallington, and from the Scheduled barrows on the edge of the escarpment on Pallington Heath, should this become possible by removal of the plantation forestry. Depending on the nature of the extraction, and the design and location of the processing facility, the degree of visual impact on the general landscape setting of the barrow cemetery was considered likely to cause less than substantial harm to the setting and significance of the monuments, given their very particular original relationship with the landform. Whilst the impacts on the setting of the Moreton Conservation Area or its associated Listed buildings are likely to be limited, the design of the processing facility could, if not sympathetic, introduce an element within this flat landscape which could be visually intrusive from the furthest north-western extent of the Conservation Area and might lead to harm to the setting. Consequently, consideration should be given to the extraction methodology and the location and design of the processing facility to identify the optimum location to reduce its intrusion to the settings and thereby adversely affecting the significance of the Listed buildings at Hurst and Pallington, the scheduled barrows and the Moreton Conservation Area.

It is noted that the exact impact on heritage assets will depend on the eventual sequence and methods of extraction. Importantly, there must also be some consideration of the potential cumulative effect on the historic agricultural landscape when should either or both of the neighbouring Sites (Station Road, Moreton and Woodsford Extension) be adopted or worked. The combined effect of neighbouring sites being worked has not been considered in detail here but would increase the impacts from the Site itself and should be taken into account.

On balance it is considered that impacts at Hurst Farm can be minimised during the extraction phase by moving the eastern boundary to the west. Consideration should also be made of parcel by parcel extraction and retention of the historic hedged boundaries and mature trees, which both screen and signify the historic arrangement of the landscape, as well as the avoidance of visually intrusive spoil dumps during the extraction. It would be desirable to maintain as much of the existing boundary system as possible, but reinstatement of those which have to be removed or damaged should be carried out after completion of extraction. This would mitigate the long-term effects on setting, even if the landform is permanently altered. Restoration plans need to take this into account an enduring alteration of the landform and identify areas where the greatest remaining ground level reduction is least visually evident and explore potential for enhancing the legibility of the landscape to a wider audience. In addition, appropriate evaluation and mitigation in relation to the archaeological

potential of the Site may provide the opportunity for greater understanding of both the post-medieval estate development, but in particular the important water meadows which are partly represented in the north-west of the Site.

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.

Hurst Farm. *Is the LA able to positively respond to the (Conservation Officer comments) and ensure:*

- i. parcel by parcel extraction*
- ii. retention of historic hedged boundaries, ditches, mature trees and Hurst copse which both screen and are clearly of historic landscape significance*
- iii. avoidance of sensitive water meadows*
- iv. setting aside land between the farm buildings and B3390*
- v. addressing 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.

9. A subsequent email from Historic England (24th August, 2018) referred to the presence of the water meadows in more detail, querying:

- i. how to determine the relative significance of the watermeadows;*
- ii. how the MPA propose to respond to the presence of the watermeadows, in applying national policy.*

Proposed Mitigation to address Historic England concerns

10. The assessment carried out by Context One has identified an approach to mineral extraction which could address the impacts identified by the Conservation Officer, including:

- i. moving the eastern boundary of the site further to the west;*
- ii. working the site through parcel by parcel extraction;*
- iii. retention of the historic hedged boundaries and mature trees, which both screen and signify the historic arrangement of the landscape;*

- iv. *avoidance of visually intrusive spoil dumps during the extraction;*
 - v. *maintain as much of the existing boundary system as possible, and reinstate those which have to be removed or damaged, after completion of extraction;*
 - vi. *for Hurst Bridge, detailed structural recording, examination by a structural engineer and on-going monitoring.*
 - vii. *appropriate evaluation and mitigation in relation to the archaeological potential of the Site, to provide the opportunity for greater understanding of both the post-medieval estate development and the important water meadows which are partly represented in the north-west of the Site.*
11. The MPA consider that such actions would mitigate the long-term effects on setting, even if the landform is permanently altered. Restoration plans need to take into account the potential for an enduring alteration of the landform and identify areas where the greatest remaining ground level reduction is least visually evident and explore potential for enhancing the legibility of the landscape to a wider audience.
12. 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

13. The MPA recognise the importance of mitigating potential impacts on heritage interests in the vicinity of the site. One option would be to include a more generalised 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.
14. 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.
15. 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, the eastern boundary of the site will be moved some distance to the west; the detail of how much of the eastern boundary will be involved and how far it will be moved will be determined following the further detailed assessment;*
 - 2. *Given the historic nature of the system of field boundaries within and around the Site, 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 both the post-medieval estate development and the important water meadows which are partly represented in the north-west of the Site.*

Watermeadows

16. Historic England have indicated they are not in a position to undertake a survey to assess the relative importance of the watermeadows, either along the Frome valley or more specifically within the area of the site (and the neighbouring AS19 Woodsford site proposal).
17. The MPA do not propose to undertake any assessment of watermeadows at this stage. The presence of the watermeadow system in the north-western part of the site is acknowledged, and a DG will be added to require that at the planning application stage the importance of the watermeadows will be assessed and appropriate mitigation identified and implemented, based on the findings of the assessment.

Archaeology

18. It is acknowledged that there is potential for there to be below-ground 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.'

19. The MSP - Hurst Farm site allocation - includes a DG requiring archaeological assessment and evaluation.

Conclusion

20. 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.