

BOURNEMOUTH, DORSET AND POOLE
Examination of the Minerals Sites Plan 2018
SESSION 19

Preamble

I am Simon Nicholas COLLCUTT *MA(Hons) DEA DPhil FSA*, a professional assessor, instructed since September 2015 by the local group, Frome Residents Against Mineral Extraction (“FRAME”), to report upon all historic environment and cultural heritage issues (the fabric and setting of built features, archaeological features, historic landscapes & gardens, etc.) arising in the context of the MSP, specifically in relation to the Cluster 4 (Moreton Area) Sites: AS-19 Woodsford Extension, AS-25 Station Road and AS-26 Hurst Farm.

I would respectfully draw the Inspector’s attention to two main sets of documents: “Proposed Minerals Allocations AS19, AS25 & AS26, Moreton Area, Dorset, Historic Environment Appraisal”, October 2015 [MSPEXT - 07]; and the three related submissions, one for each of the Cluster 4 Sites, “Mineral Sites Plan Pre-Submission Draft – FRAME – Cultural Heritage”, January 2018 [PSD - MSP369 to 371].

(C) AS-19: Woodsford Quarry Extension, Woodsford; Question 133

A range of impacts, including “Very significant adverse impacts” (Category A), has been identified in the Site Assessment on cultural heritage criteria C9-historic landscape and C11-archaeology by the County’s professional officers because there has not been sufficient assessment to narrow the possibilities. In their report on this site [MSDCC – 40], Context One explicitly state that EH AN3 ¹ Step 1 (identifying which heritage assets are affected by the potential site allocation) had been completed before their instruction and that their work was aimed principally at EH AN3 Step 2 (understanding what contribution the Site (in its current form) makes to the significance of the heritage asset(s)), with only brief consideration of elements of later Steps where possible; in the case of AS-19, the Context One work did not include simple or cumulative impact assessment (Step 3) or consideration of the feasibility of mitigation. Context One do state rather obliquely that “the appropriateness of the boundaries of extraction areas” remains to be assessed (paragraph 7.8). The currently unquantified MPA suggestion that the northern part of AS19 not be worked (evidently, reducing the expected mineral yield) adds further uncertainty to the assessment of likely cultural heritage impact (depending upon the quarry design, uncertainty which could decrease or increase the potential impact, especially on factors such as waterlogged archaeological remains, within and outside the eventual working areas).

¹ Historic England 2015. Advice Note 3 - The Historic Environment and Site Allocations in Local Plans.

The present author has submitted detailed analysis of the cultural heritage interests in AS-19 in [MSPEXT - 07] and [PSD - MSP369]. It is asserted that there would be numerous negative impacts under C9, C10 and C11 which have not been identified at all in the MPA assessments (cf. the present author's Statement below with respect to Question 136); obviously, the mitigation of such impacts has not been addressed.

By its own account, the MPA does not know whether negative impacts of unassessed and inadequately assessed (but potentially high) severity can be adequately mitigated. It is respectfully submitted that the complete absence of analysis of impacts upon cultural heritage interests, and thus of the feasibility of mitigation, in the proposed MSP and its supporting documents lacks positive preparation, is unjustified and is inconsistent with national policy, rendering the proposed MSP unsound in respect of the subject of Question 133.

(C) AS-19: Woodsford Quarry Extension, Woodsford; Question 135

The Inspector's understanding of the heritage significance of "Sculpture by the Lakes" appears entirely correct to the present author, who is of the opinion that, although currently non-designated, this asset is of equivalent significance to a Registered park; paragraph 123 of the NPPF also applies in respect of tranquillity prized for its recreational and amenity value. Both the Site Assessment and the Context One report mention the sculpture park but there is no assessment of heritage significance, of likely impact or of potential mitigation. Relevant cultural heritage details concerning the sculpture park (with notes on the national and international links involved) may be found in [MSPEXT - 07], including initial analysis of negative impacts from both AS-19 and AS-26: Hurst Farm.

It is respectfully submitted that the complete absence of analysis of impacts (simple or cumulative) upon the cultural heritage asset "Sculpture by the Lakes" in the proposed MSP and its supporting documents lacks positive preparation, is unjustified and is inconsistent with national policy, rendering the proposed MSP unsound in respect of the subject of Question 135 (and of the same issue which arises concerning AS-26).

(C) AS-19: Woodsford Quarry Extension, Woodsford; Question 136

In their report on this site [MSDCC – 40], Context One explicitly state that EH AN3² Step 1 (identifying which heritage assets are affected by the potential site allocation) had been completed before their instruction and that their work was aimed principally at EH AN3 Step 2 (understanding what contribution the Site (in its current form) makes to the significance of the heritage asset(s)), with only brief consideration of elements of later Steps where possible; in the case of AS-19, the Context One work did not include simple or cumulative impact assessment (Step 3) or consideration of the feasibility of mitigation.

The Context One report has been expressly constrained as to scope (assets to be included) by the MPA. The Context One report does not reference any cultural heritage assessment

² Historic England 2015. Advice Note 3 - The Historic Environment and Site Allocations in Local Plans.

external to the County Council (i.e. the results of previous consultations are ignored). In any case, the Context One report does not deal with impact assessment and does not cover the subject of setting. Context One exacerbate the misidentification by the proposer's agents by recognising only Tertiary geology (Poole Formation) on the Site. The Context One work has not even included a basic (public domain access) site visit, let alone a proper Site walkover. The Context One report is not fit for purpose.

The report [MSPEXT - 07] contains references to a series of critical issues (such as the possibility of highly significant waterlogged archaeological remains, archaeological remains within the actual mineral body ³, the setting of Listed Buildings, the demolition of the historic Dairy buildings ⁴ or cumulative cultural heritage effects) which have either not been touched upon at all in any MPA document or which have not been assessed by the MPA and its consultants according to professional standards appropriate and proportional in the Plan-Making context.

In February 2018, the MPA provided a copy of a report by The Historic Environment Consultancy, entitled "Review of the Impact on the Historic Environment from Proposed Gravel Extraction, Moreton, Dorset [Version 2, 30 January 2018]" [MSPEXT – 03], compiled at the instruction of the Moreton Estate. Whilst the actual assessment of the contribution from setting to heritage significance of the Listed Clyffe House is not agreed (the Estate's consultants find "None – the building would be listed whatever the setting", whilst the present author notes that the views southwards are views designed by the architect Benjamin Ferrey *FSA FRIBA* (a student of Pugin)), the LiDAR-based (vegetation in-leaf) models in figs. 45-47 do confirm (incidentally, since this land is not part of the Estate) that much of AS-19 will fall within the viewshed of the House. The MPA and thus their consultants, Context One, do not even mention Clyffe House.

It is respectfully submitted that the potential impacts on the significance of all heritage assets cannot, by express *a priori* design, have been adequately addressed by Context One, such that the proposed MSP, with its supporting documents, continues to lack positive preparation, is unjustified and is inconsistent with national policy, rendering the proposed MSP unsound in respect of the subject of Question 136.

Dr. S. N. Collcutt for FRAME (04/09/2018)

³ The present author claimed that the Palaeolithic interest in the local mineral bodies had been ignored across the general area, in the context of an application for a different extension to Woodsford Quarry (southwest of the village); in the event, this application was refused (22 March 2018) largely on cultural heritage grounds but not before officers had recognised that the Palaeolithic was indeed an issue and had recommended a Condition expressly requiring evaluation of this topic.

⁴ This part of the Frome is Thomas Hardy's "Valley of the Great Dairies", recognised as one of the heritage opportunities underpinning the proposal for a Dorset National Park to include this area (see Dorset National Park - Short Case Study Series: 3. Thomas Hardy & the Proposed Dorset National Park (2018), a copy of which is appended to Mr. Wickenden's Statement concerning Question 57).