

BOURNEMOUTH, DORSET AND POOLE
Examination of the Minerals Sites Plan 2018
SESSION 21

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-26: Hurst Farm, Moreton; Question 158

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 – 42], 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-26, 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 eastern and northern parts of AS-26 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

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

decrease or increase the potential impact, especially on factors such as waterlogged archaeological remains, within and outside the eventual working areas).

The present author has submitted detailed analysis of the cultural heritage interests in AS-26 in [MSPEXT - 07] and [PSD - MSP371]. 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 160); 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 158.

(C) AS-26: Hurst Farm, Moreton; Question 159

The Site Assessment and SA in respect of cultural heritage interest affected by AS-26 are wholly inadequate, with regard to scope, standards and simple common sense. For instance, it is stated that a very large hole in the ground will have only temporary impact upon archaeological interests, whilst no relevant historic buildings looking towards the Site (or which have historic association with a Site that, not coincidentally, has the name "Hurst Farm") are mentioned at all.

Cultural heritage assessment concerning the potential effects of AS-26 may be found in [MSPEXT - 07] and [PSD - MSP371]; in order to avoid repetition, further details relevant here may be found below under the present author's response to Question 160.

It is material to note here that the Site Assessment and SA claim to date from November 2017. The opinion of the Purbeck District Council Design & Conservation Officer was requested by the MPA and that opinion was provided in June 2017. After the present author indicated that he was about to submit an FOI request to be allowed to see this opinion, a text was finally issued in the public domain (cf. [MSPEXT - 05]), with a most surprising rider, distancing both the District and the MPA from the opinion of their professional officer; the Inspector is respectfully requested to treat this rider with the levity it deserves. The Conservation Officer's opinion was not even mentioned in the Site Assessment and AS.

It is respectfully submitted that the complete absence of analysis of impacts (simple or cumulative) upon the cultural heritage interest affected by AS-26 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 159.

(C) AS-26: Hurst Farm, Moreton; Question 160

In their report on this site [MSDCC – 42], 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-21, 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 external to the County Council (i.e. the results of previous consultations are ignored, including the opinion of the District Conservation Officer). In any case, the Context One report does not deal with impact assessment and does not cover the subject of setting. Context One misidentify the mineral involved, 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 (including Palaeolithic remains), the loss of some of the earliest watermeadows in the country, the setting of Listed Buildings and of non-designated assets of high quality (e.g. “Sculpture by the Lakes”, or the 18th century Hurst Farmhouse), the severing of the historic Hurst Farmhouse and its Barns from their associated land 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. Context One do not mention any Thomas Hardy connection in this, the “*Valley of the Great Dairies*”³, nor do they mention the paintings of the Moreton area by Hardy’s friends, Frederick Whitehead and Henry Moule. Another of Hardy’s friends was T. E. Lawrence; the present author does not know of any more specific links between Lawrence and the AS-26 land itself, although the T. E. Lawrence Society may have more information on this matter.

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 assessments of the assets affected, their significance, the likely impacts of the mineral allocations (as simple and cumulative effects) and the possibility of mitigation are certainly not agreed, it is of interest that the Review contains viewshed analyses from some assets, developed from a LiDAR-based digital surface model (e.g. in [MSPEXT – 03], figs. 11 and 12 show viewsheds for the ground floor and first floor respectively, calculated from the closest Listed Buildings). The

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

³ 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).

present author has requested the date(s) of the LiDAR survey but (as of 16/08/2018) The Historic Environment Consultancy have replied that the dating is unknown to them. The viewer must therefore rely upon information intrinsic to the viewshed plots. Looking at plots for individual assets, particularly those which are quite close to the Site (e.g. Hurst Dairy or Hurst Bridge), one can see how marked was the effect of vegetated boundaries on the viewsheds shown, such that one must conclude that the vegetation was largely in leaf at the time of the survey. Thus, even though we do not have the date(s) of the survey, it can still be seen that the extent of the viewsheds plotted is towards an annual (seasonal) minimum, a significantly wider extent probably being relevant in the deeper (leafless) 'winter' in this dominantly deciduous landscape. Furthermore, the nature of the model is that it uses the existing ground surface; once that surface is changed out of the approximately horizontal plane (either by deep excavation or by bunding or stocking, or indeed by buildings or larger/taller machinery), the visibility of the mineral workings would automatically increase most significantly.

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 160.

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