

BOURNEMOUTH, DORSET AND POOLE
Examination of the Minerals Sites Plan 2018
SESSION 4

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) Clusters; Question 32 (cf. also Question 50)

The SA notes the requirement of cumulative cultural heritage impact assessment in the EAPPR 2004; however, Objective 6 in Table 4 fails to reflect this duty. With respect to SEA Directive Issues, Table 7 has nothing specific under the cultural heritage rubrics but does have a reference to the need to assess cumulative matters under “All [issues]” (Site Selection Criterion C21); however, the cultural heritage rubric in Table 8 does not refer to C21. Table 9 does not identify cumulative cultural impact issues as relevant to the quantity of sites to be identified in the Plan. The SA notes Policy MS-2 (iv) (b) but makes no specific statement with respect to potential cumulative cultural heritage impacts of Proposal Sites in conjunction with existing and permitted sand & gravel sites. Cultural heritage matters are not mentioned in the tabulated examples of cumulative, secondary and synergistic effects in paragraph 8.9. In respect of cumulative, secondary and synergistic effects within Cluster 4 (paragraphs 8.32-40), no mention whatsoever is made of any cultural heritage issue. Section 11 (Mitigation) does not mention cultural heritage effects, let alone cumulative ones.

The Site Assessment for AS-19 (which contains tabulated matters per Planning issue plus a section specifically on cumulative effects) makes no mention of cumulative cultural heritage impacts, whether between this Proposal Site and others in Cluster 4 or between this Site and existing and permitted sand & gravel sites.

The Site Assessment for AS-25 (which contains tabulated matters per Planning issue) makes no mention of cumulative cultural heritage impacts, whether between this Proposal Site and others in Cluster 4 or between this Site and existing and permitted sand & gravel sites. However, there is also a specific section on heritage impacts (apparently containing a partial digest of the legal and policy matters raised in [MSPEXT - 07]) which does include a statement to the effect that PPG requires cumulative impacts to be considered. There is no sign in the Assessment that this has actually been done; indeed, there is no mention of cultural heritage impacts in the subsequent section specifically on cumulative effects.

The Site Assessment for AS-26 (which contains tabulated matters per Planning issue) makes no mention of cumulative cultural heritage impacts, whether between this Proposal Site and others in Cluster 4 or between this Site and existing and permitted sand & gravel sites. However, there is also a specific section on heritage impacts (apparently containing a partial digest of the legal and policy matters raised in [MSPEXT - 07]) which does include a statement to the effect that PPG requires cumulative impacts to be considered. There is no sign in the Assessment that this has actually been done; indeed, there is no mention of cultural heritage impacts in the preceding section specifically on cumulative effects.

In passing, I note that the Context One reports commissioned by the MPA ([MSDCC – 40 to 42], dated November 2017, just like the SA and Site Assessments) note the need for assessment of cumulative impacts upon cultural heritage issues but do not find such assessment to be possible in these three cases.

The MPA might respond that cumulative cultural heritage matters have been dealt with in an appropriate manner, despite the lack of specific reference in the AS and Site Assessments. It is the present author's impression that, on the contrary, there is a certain 'culture of dismissal' of this issue in this Planning Authority. One may cite in evidence a consultation response * to the Mineral Planners (July 2016, confirmed as still valid March 2018) from the Senior County Archaeologist in conjunction with Planning Application WD/D/15/001057 – Northern Extension of Woodford Quarry (subsequently refused at Committee stage largely on cultural heritage grounds) in respect of cumulative archaeological effects:

“Dr Collcutt also refers to the widespread loss of archaeological remains in the area through quarrying. I should point out that this loss is being mitigated by archaeological recording, and this work is providing a picture not simply of the archaeology of a single site, but of a much larger area - you might say of a landscape. For instance, the recording and interpretation of ancient field systems across this area is likely to provide insights into changes in landholding and organisation.”

This attitude is not consistent with professional archaeological standards, does not reflect technical capabilities for non-destructive recording, and is clearly counter to the intent of paragraphs 141 and 144 of the NPPF; paragraph 143 is the corresponding 'cumulative effect' point made with respect to Mineral Plan-making.

It has not been part of the present author's instruction to examine cultural heritage matters across the current Proposal Sites. However, it is not plausible (and would, in the converse case, be more worrying still) that the Cluster 4 Sites have been subject to a significantly different approach from that used with all the other proposed Sites. It is respectfully submitted that the complete absence of analysis of cumulative impacts upon cultural

heritage interests in the proposed MSP, with 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 32 and thus of that same subject in Cluster-specific Question 50.

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

*Complete copy of email appended

Planning

From: Andrea J Spencer
Sent: 01 July 2016 14:51
To: Planning
Subject: WD/D/15/001057 - EXTENSION OF QUARRY, WOODSFORD QUARRY

From: Steve Wallis
Sent: 01 July 2016 11:58
To: Robert W Jefferies
Subject: WD/D/15/001057 - EXTENSION OF QUARRY, WOODSFORD QUARRY

Dear Rob

You asked my opinions of the matters raised in the third paragraph of the letter from Dr Collcutt dated 24th June.

In my view the mitigation by archaeological recording is sufficient for this site. Nothing has been found that merits preservation in situ.

Dr Collcutt also refers to the widespread loss of archaeological remains in the area through quarrying. I should point out that this loss is being mitigated by archaeological recording, and this work is providing a picture not simply of the archaeology of a single site, but of a much larger area - you might say of a landscape. For instance, the recording and interpretation of ancient field systems across this area is likely to provide insights into changes in landholding and organisation.

Best wishes

Steve Wallis
Senior Archaeologist