



Historic England

Minerals and Waste Policy Team
County Hall, Dorchester, DT1 1XJ
Response by email only: mwdf@dorsetcc.gov.uk

31 January 2018

Dear Sirs,

Bournemouth, Dorset and Poole Mineral Sites Plan Pre-Submission Draft

Thank you for sharing the Pre Submission version of this important planning document. Our assessment and observations are mindful of the Government's expectation, and a key test of Soundness, that the Minerals Plan contributes to the delivery of sustainable development in accordance with the National Planning Policy Framework (NPPF)¹; one of the core dimensions being the protection and enhancement of the historic environment².

We refer to the following statutory and policy tests.

1. Plans should meet objectively assessed needs (though, for example the allocation of sites for development), unless specific NPPF policy relating to e.g. designated heritage assets, indicate development should be restricted (NPPF Paragraph 14).
2. Great weight should be given to the conservation of heritage assets (NPPF Paragraph 132);
3. Special regard must be given to desirability of preserving the setting of a listed building and special attention must be given to desirability of preserving or enhancing the character or appearance of a conservation area in the exercise of planning functions (S66 & S72, Planning (Listed Buildings and Conservation Areas) Act 1990);
4. Development will be expected to avoid or minimise conflict between any heritage asset's conservation and any aspect of the proposal (NPPF Paragraph 129);
5. Harm (significant adverse impacts) should be avoided. Only where this is not possible should mitigation be considered (NPPF Paragraph 152). Any harm and mitigation proposals need to be fully justified and evidenced to ensure they will be successful in reducing harm.

Evidence as to whether the historic environment has been appropriately considered will help determine whether the Plan has been positively prepared, is justified, effective and consistent with national policy.

¹ NPPF paragraphs 151 and 182

² NPPF paragraph 7



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It will be important for you as the local authority to be satisfied that sufficient evidence has been gathered to show that there is a clear understanding of how the historic environment and heritage assets may be affected and to what extent (the degree of harm the significance of the asset). It will then be important for you to clearly indicate that a positive approach to the historic environment has adopted and how the key statutory and national policy obligations have been applied.

Purbeck District Council Conservation Officer Assessment June 2017

We note Purbeck DC's Conservation Officer's robust assessment of the impact of the proposed allocations on the significance of affected heritage assets and helpful suggestions to mitigate or minimise harm.

As the evidence applies the appropriate legislation and national policy we consider it to be reasonable for the local authority to consider and respond to its conclusions and illustrated recommendations. Your response will help to demonstrate how you have paid sufficient regard to the need to conserve the historic environment.

We note, and appreciate, the 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.

In addition, Historic England has the following comments.

Policy MS-1: Production of Sand & Gravel - Great Plantation, Bere Regis

The proposed quarry would have a major impact on the settings and significance of three scheduled monuments: a Bronze Age round barrow and two sections of the Battery Bank linear earthwork. These three heritage assets are 'landscape monuments' intended by their builders to have a distinctive topographical and visual presence in the landscape. The landscape setting of the monuments is of key importance to an understanding and appreciation of these heritage assets and is a fundamental and significant component of their heritage significance and public value. The present proposals, both in the position and extent of the quarry and also in the landform created in the post-extraction restoration scheme, would bring permanent major adverse changes to the landform and landscape which provides the primary context and setting of the monuments. We consider that these proposals would result in substantial harm to the significance of these designated heritage assets.

We consider that there may be scope for extraction in the area to the north of the Battery Bank and east of the barrow, but the proposals would need significant modification in order to reduce the level of harm to the affected heritage assets to a level where it would be acceptable. The area of extraction would need to be significantly smaller than that currently proposed, and designed so as to retain sufficient historic landform around and between the monuments to maintain the integrity of their landscape setting. Similarly, the present quarry restoration scheme would need to be significantly modified so that it would reinstate ground surfaces at, or close to, the existing historic



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ground levels within the primary settings of the monuments in order to restore as far as possible their visual landscape settings.

We would welcome the opportunity to further discuss this matter with you.

Policy MS-5: Site for the provision of Ball Clay - Trigon Hill Extension, Wareham

The proposed quarry would have a major impact on the settings and significance of the scheduled Bronze Age round barrow monument on Trigon Hill. This designated heritage asset is a 'landscape monument' intended by its builders to have a distinctive topographical and visual presence in the landscape. The landscape setting of the monument is of key importance to an understanding and appreciation of the heritage assets and is a fundamental and significant component of its heritage significance and public value. The present proposals, both in the position and extent of the quarry and also in the landform created in the post-extraction restoration scheme, would bring permanent major adverse changes to the landform and landscape which provides the primary context and setting of the monument. We consider that these proposals would result in substantial harm to the significance of the designated heritage assets.

We consider that there may be scope for extraction in part of the remaining natural landscape around the barrow, but the proposals would need significant modification in order to reduce the level of harm. We would strongly suggest that the area of extraction would need to be significantly smaller than that currently proposed, and designed so as to retain sufficient historic landform around the monument to maintain the integrity of its landscape setting. Similarly, the present quarry restoration scheme would need to be significantly modified so that it would reinstate ground surfaces at, or close to, the existing historic ground levels within the primary settings of the monuments in order to restore as far as possible its visual landscape setting.

We would welcome the opportunity to further discuss this matter with you.

Policy MS-3: Swanworth Quarry Extension

Historic England (Keith Miller) in recent dialogue with the prospective applicant and their agent, have discussed, and as we understand, agreed a scheme to minimise the level of harm to the settings of two scheduled round barrows. If such arrangements/conditions are reflected in the Plan Historic England considers the allocation would be soundly based.

Policy MS-8: Puddletown Road Area Policy

It would be helpful if the local authority were to confirm why this Policy only appears to address potential issues relating to the natural environment.

We hope our comments will assist you in the preparation of a sound and robust plan and would welcome the opportunity to discuss our comments further.

Yours sincerely

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