

CM/LM/PD11931

email: [REDACTED]

13 November 2018

Mrs A Christine Self MIBMS  
Programme Officer

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Email: [REDACTED]

Dear Mrs Self,

**BOURNEMOUTH, DORSET AND POOLE MINERAL SITES PLAN (MSP) – EXAMINATION  
SCREENING OF SITES IN ‘CLUSTER 4’ FOR CUMULATIVE IMPACTS ON HERITAGE**

We write on behalf of the Woodsford Farms in relation to the Bournemouth, Dorset and Pool Mineral Sites Plan Examination response to the Screening of Sites in Cluster 4 for Cumulative Impacts on Heritage, specifically in relation to AS19.

This letter has been prepared by suitably qualified professionals (IHBC and RTPI), with input from MOLA on archaeology.

**Summary**

In summary, the assessment of cumulative effects by Dorset County Council meets the requirements of the Strategic Environmental Assessment (SEA) Directive.

The SEA Directive requires consideration of the likely significant effects, including the secondary, cumulative, synergistic, short, medium and long-term, permanent, temporary, positive and negative effects. The table submitted by Dorset County Council is structured to clearly demonstrate that each of these factors has been considered (there is a column for each).

We also note that SEA need not be done in any more detail than is useful for its purpose, and that it is not usually appropriate in SEA to predict the effects of an individual project-level proposal in the degree of detail that would normally be required for an Environmental Impact Assessment. The level of detail provided is appropriate.

**Cultural Heritage – Historic Buildings**

In relation to AS19, The effect on Frome Bridge, which is grade II listed, is considered under the heading ‘Cultural Heritage – Archaeology/ Historic Landscapes’, although as a standing structure it could equally be considered under the heading ‘Cultural heritage – historic buildings’.

Regardless of the heading, the assessment is appropriate, identifying the potential for a setting effect on Frome Bridge, c. 110m north of AS19, although our assessment is that given the existing dense woodland between

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the bridge and AS19, the effect would be capable of mitigation and would be acceptable (if it is indeed a significant effect).

There is unlikely to be a cumulative effect on Frome Bridge from the existing Woodsford Quarry because they are separated by dense woodland, nor from other proposed minerals sites. AS26 is closest, 1.3km to the east, so is not likely to give rise to significant cumulative effects.

We agree that there is no potential for other significant cumulative effects on historic buildings, for the following reasons:

- AS19 and AS26 are adjacent. The closest listed buildings to AS19 and AS26 are two listed buildings in Pallington, to the north of A26, but there is no intervisibility with either proposed allocation site, because of the screening effects of existing trees and vegetation. The representations prepared by Oxford Archaeological Associates Ltd on behalf of FRAME (the "OAA Representations", MSPEXT-07) agree there will be no visual effect, see paragraph 4.4.6.
- Any noise effects are capable of mitigation through bunds, noise limits, limits on hours of working and limits on working adjacent parts of AS19 and AS26 at the same time. There would be no harmful cumulative effects on these listed buildings.
- AS25 (Station Road) is located over 600m to the south-east of AS19 and is separated by dense woodland at Hurst Heath, so there is no visual connection between the proposed allocation sites. The closest listed buildings to AS19 and AS25 are located in Moreton, c. 770m to the south of AS19, and separated by interposing development and dense woodland so there is no potential for a cumulative effect.

### **Cultural Heritage – Archaeology/Historic Landscape**

The Council has identified the potential for secondary archaeological effects beyond the site boundary 'in the event that workings result in significant off-site changes to hydrology', and agree that these are addressed through the DG for the Historic/Cultural Environment. We enclose a detailed response to this prepared by D.K. Symes Associates who are experienced in water management for sand and gravel quarries.

We note that in those areas where the archaeological remains are above the water table, drying out will make no difference as there will be no organic survival to lose in this layer. In those areas where the archaeological remains are below the water table, dewatering would only impact upon remains which survive in a waterlogged environment e.g. pollen, wood, leather.

Based on archaeological works to date all investigations (trenches, etc.) have been dry, i.e. above the natural groundwater level.

### **Conclusion**

We conclude that the assessment of cumulative effects by Dorset County Council meets the requirements of the Strategic Environmental Assessment (SEA) Directive.

The cumulative effects would be considered further in an Environmental Impact Assessment at application stage.

With best wishes,

Yours truly,

*Montagu Evans*

**MONTAGU EVANS LLP**

cc. Trevor Badley – Dorset County Council

**D.K. Symes Associates**  
**AS19 - Cultural Heritage**

<b>Issue / Impact</b>	Concern has been raised on the potential impact on any archaeological features as a result of dewatering / water management.
<b>Response</b>	<p>The mineral deposit on AS19 is divided into 'terrace' deposits of sand and gravel and 'floodplain' deposits. The 'archaeological' surface of the terrace deposits is below the soil being on the upper surface of the sand and gravel. Based on archaeological works to date all investigations (trenches, etc.) have been dry, i.e. above the natural groundwater level. Therefore dewatering (if needed) when working the terrace deposits will have no impact.</p> <p>The situation is expected to be similar for the floodplain deposits, namely the archaeological surface will be the upper surface of the mineral deposit. However, the level of the groundwater is close to the ground surface so any archaeological features are likely to be below groundwater level. Dewatering will impact on this archaeological surface through drawing down the water table. This has the potential to adversely impact on any archaeological features. That said, there is also the factor of timescale; namely that short-term impact (say 0 - 6 months) will have a very limited impact, whereas if it is 'long-term' (over 6 months) then this opens the possibility of 'drying out' of any features / remains.</p> <p>Mitigation for 'draw down' of groundwater levels is through the use of a recharge facility. This is often in the form of a trench or ditch the base of which is hydraulically connected to the aquifer (in this case the floodplain deposits).</p> <p>Impacts on the archaeology will only occur when working takes place within the floodplain deposits. This area (on AS19) is bounded and crossed by a number of ditches that are hydraulically connected to the aquifer as evidenced by the change in water levels throughout the year.</p> <p>In order to minimise any impacts on groundwater generally, the mineral areas between the ditches will be excavated in a phased manner. The discharge of any water from dewatering will be to the adjacent ditches which act as a natural recharge to the gravels so will limit the extent of drawdown.</p> <p>Further it is expected that archaeological investigation will be phased so the risk of 'drying out', either short or long term, is very low / remote.</p>

DKS/yw/  
1 November 2018