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Direct Dial: 0117 975 0670

Our ref: P00844471

8 June 2018

Dear Mr Jefferies

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**TRIGON PIT, CAREY ROAD, WAREHAM, DORSET
Application No. 6/2018/0138**

Thank you for your letter of 23 March 2018 regarding the above application for planning permission. On the basis of the information available to date, and following the extension of time for a response, we offer the following advice to assist your authority in determining the application.

Summary

The proposed quarrying development would have a major impact upon a scheduled prehistoric barrow sited on Trigon Hill, a prominent ridgetop overlooking a wide area of surrounding landscape. The barrow has already been significantly impacted by previous quarrying in the adjacent areas to its east, south and north east. The unquarried land in the western quadrants is now the only section of historic landform still remaining intact around the barrow. We previously advised in response to the Scoping Opinion request (letter of 16 May 2017), that any further significant encroachments by modern development into the remaining historic landscape around the barrow would be harmful to the setting and significance of the monument, both in its own right and cumulatively with the previous developments, and that any development proposal which would result in the barrow being left as an isolated feature within a man-made landscape would not be acceptable. This still remains our advice. The present application for quarrying and subsequent backfilling of the area to the west and north-west of Trigon Hill would involve the loss of a section of surviving historic landscape which forms a critical part of the barrow's setting and archaeological context. Some mitigation and offsetting of impact is proposed in the application. However, even taking this into account, we consider that the overall level of harm to the setting and significance of the Trigon Hill barrow would (in NPPF terminology) be substantial and contrary to national and local planning policy. We therefore object to the present proposal and recommended refusal.

We consider that there may be scope for limited quarrying at the northern end of the application site, subject to close assessment of its potential impact. We also note that the proposal is being promoted in the Local Plan, which will allow due scrutiny.

Historic England advice

Significance of the affected heritage asset

The quarrying proposals affect the scheduled monument statutorily designated as *Bowl barrow on Trigon Hill, 880m north east of Trigon House*, (National Heritage List no. 1015896). In the National Planning Policy Framework (NPPF), scheduled monuments are at the highest grade of designated heritage asset. Key aspects of the significance of the Trigon Hill barrow which are particularly relevant to the present application are the good survival of the monument and its close relationship with topography, landform and the surrounding landscape, and its association with other archaeological sites in the area.

Trigon Hill barrow is a well-preserved Bronze Age form of burial mound known as a bowl barrow, a type of funerary monument that was once a distinctive feature of the landscape of this area. Barrows are an important historic element today's multi-period landscapes, where they often occupy prominent locations and frequently form the earliest visible evidence of human occupation. Their considerable variation of form and longevity as a monument type provides important information on the diversity of beliefs and social organisations in early prehistoric society and on the landscape within which they were constructed. Most examples of prehistoric barrows, both nationally and regionally, have been reduced or levelled by later cultivation, or enveloped by forestry or built development, and those barrows that survive in good condition and within a rural landscape setting are of especially high regional and national significance and public value. Trigon Hill barrow amply fulfils these criteria.

The barrow has a circular mound composed of sand, earth and turf, measuring approximately 17m in diameter and up to 1.2m high. Surrounding the mound is a ditch from which material was quarried during the construction of the monument. The ditch has become infilled over the years, but will survive as a buried feature up to 2m wide. The barrow survives well and will contain archaeological and environmental evidence relating to the monument and the landscape in which it was constructed. It has great archaeological interest and has the potential to contribute to regional and national research objectives.

There is a record in the Dorset Historic Environment Record of a second barrow to the south-west of the scheduled barrow; no evidence for it was found in recent surveys and it is thought to have been removed by quarrying.

Heritage setting considerations

The primary heritage concern here is the proposed impact of the development on the setting and significance of Trigon Hill barrow.

The setting of a heritage asset defined as:

'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'

(NPPF Annex 2); PPS 5 *Practice Guide* para. 113).

All heritage assets have a topographical presence and a setting, including those consisting primarily of buried archaeological deposits.

Assessment of impact on setting for planning purposes should take account of the whole of an asset's setting, irrespective of current public accessibility. NPPF and HE setting guidance are clear on this point:

'The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstances.'

(NPPF *Planning Practice Guidance: Conserving and enhancing the historic environment*, 'What is the setting of a heritage asset and how should it be taken into account?' para. 013; Historic England, *The setting of heritage assets (Historic Environment Good Practice Advice in Planning: 3)*)

This is relevant to heritage assets and their surroundings which, for reasons of ownership or land use, are not at present readily accessible to the public (as is the case with Trigon Hill barrow). Impacts of development proposals on these areas of an asset's setting need to be taken into account.

Also relevant to the present application is that impacts on setting are not limited to visual impacts alone. Although views of or from an asset will play an important part, the way in which an asset is experienced in its setting is also influenced by other environmental factors such as noise, dust, smells and activity in the vicinity. It is also influenced by our understanding of the historic or archaeological context of the asset and the relationship or association between historic places.

The implications of cumulative change also need to be taken into account when assessing applications for development which may affect the setting of a heritage asset.

The relationship of prehistoric barrows to their local landscape and topography is a key factor of their heritage significance. They combined a funerary and ritual function with that of territorial marker, and are often prominently sited on features such as hills, ridges and river valley terraces. Trigon Hill barrow stands on a prominent hill on the irregular ridge which forms a watershed overlooking the Piddle Valley system on the south and west, and undulating heathlands on the east. Other barrows in this area, on Northport Heath to the east of Trigon, to the west at Bere Heath, and along the ridge on the south side of the Piddle valley, also occupy positions overlooking the valley and heathlands. This distinctive topographical arrangement was clearly a characteristic of certain barrows in the area.

Such barrows were designed to be seen and to serve as landmarks and viewpoints for the surrounding landscape. In heritage setting terminology, these sites incorporate primary '*intentional*' or '*designed*' views to and from the surrounding landscape, their location being carefully chosen to be clearly visible from the surrounding area and at the same time providing extensive views across their surroundings.

The Trigon Hill barrow is a prime example of such a barrow. Its location, on the highest point in a wide area, overlooking a broad sweep of land on each side, was selected by its builders to maximise its landscape role as marker and viewpoint. Trigon Hill ridge is deliberately 'landmarked' by the barrow. Moreover, this barrow is distinguished by being one of the highest-sited barrows in the area, which may have given it particular status. Trigon Hill itself is the highest point on the ridge here, and one of the three highest points within the wider Wareham Forest and Heathland area north of the Piddle Valley, each of which is marked by prehistoric monuments.

The site provides views to and from the barrow in all directions, and in particular the southern and western quadrants, with the ridge sloping down to the valleys below, where the barrow's topographical relationship to its surroundings can still be clearly appreciated. The topographic setting of the barrow suggests that its associative relationship with the land in these quadrants is a key one, with the settlements of the contemporary Bronze Age community on the more sheltered and fertile lower land and their barrow dominating the ridge above, connecting the living with their ancestors (ES Appendix 3, 2.4). On the east side of Trigon Hill, the barrow would have overlooked lands grazed by this or neighbouring communities, again with the ridgetop barrow serving as a ceremonial and territorial marker. Local variations or features in the topography are likely to have been significant to the builders of the barrow, influencing its size and position and its visibility and appearance from particular places in the local landscape, including barrows and other sites in the surrounding area.

In visual terms, views of the barrow and its hilltop from the immediate and surrounding landscape, and views from the barrow into its surroundings, are essential to an appreciation and understanding of the monument, and a key aspect of its heritage significance and public value. (Views here should be understood as dynamic views moving through the landscape, and sensitive to subtle variations in topography and viewpoints.)

The application acknowledges that 'topography is a major factor in the setting of the monument and makes a key contribution to its significance' and that 'the monument can still be appreciated in its original topographical setting', which 'continues to make a high contribution to the significance of the asset' (ES 11.6.8; Setting Assessment ES Appendix 3). Despite this, the application contends that the proposed development would not have a significant impact on the setting of the barrow. The application does not provide sufficient illustrative coverage of the visual setting of the barrow, or of the potential visual impact of the proposed quarry (e.g. through the use of photomontages), to support this claim. Photographs are provided in the LVIA for landscape assessment, but not for assessment of impact on heritage setting. However, some of the LVIA photos do show views relevant to the present discussion. For instance Photoviews from viewpoints B and C in the Piddle Valley to the south and south-west, looking towards Trigon Hill, are similar to views from other Bronze Age barrow monuments in the valley. These views, with Trigon Hill prominent on the horizon and parts of the existing quarry clearly visible on the flanks of the ridge, give an indication of the significance and sensitivity of Trigon Hill and the area of the application site when viewed from the valley, and indicate that the development will indeed have a significant impact.

Whilst modern tree planting and vegetation growth may now interrupt views to and from Trigon Hill and its barrow, this vegetation is transient in relation to the longevity of the monument; the key factor is that the historic landform itself survives. The surviving historic landform containing the barrow provides more than a simple visual context. Whilst visual setting is clearly important, the wider perceptions and experience of the surroundings, and the potential archaeological interest or 'evidential value' embodied in these surroundings and in the associative relationships between heritage assets, are also important to the setting and heritage significance of the affected monument.

This heritage value of the barrow's surviving surrounding landform is dependent upon the land area retaining its authentic historic fabric. In contrast to quarried or restored land around the barrow, the surviving historic landform west and north of the barrow has authenticity and integrity in geological, historical, archaeological, topographical and landscape terms. In relation to archaeology and the historic environment, it has value for the potential evidence and information it contains for an understanding of past landscapes and human activity within them. Such evidence may survive in the form of subtle details of the topography and inter-relationships of landscape features, or in the form of buried archaeological remains and paleo-environmental deposits.

With regard to potential archaeological interest, the application refers to archaeological evaluation in the form of trial pits and trenches in the proposal site, undertaken in connection with previous applications, and assesses that there is low to moderate potential for previously unrecorded features of Bronze Age date, (ES paras 11.3.3 - 11.3.4). These assessments may well be underestimates, as archaeological sites in this kind of landscape are difficult to identify through such trial work, especially for the kinds of human activity likely to have taken place here, leaving traces in discrete areas in the form, for instance, of flint tools or flint-working debris, or burning, pits, post-holes and ritual deposits etc. Moreover, there is potential for palaeoenvironmental and geoarchaeological evidence of changes in the local landscape as a result of human activity, but again these can be hard to identify and predict through trial work. Any such evidence of land use here during the prehistoric period, especially the period of the barrow, would be highly significant for an understanding of the archaeological and environmental context of the monument in its setting. Any archaeological sites here would also have their own setting and associative value in relation to the barrow, enhancing their heritage significance. The key point here is that the landform of the application site has potential archaeological interest which is potentially highly significant to the scheduled barrow and its setting.

As well as the intrinsic archaeological interest of Trigon Hill barrow and other archaeological sites or remains surviving within and around the application site, any significant inter-relationships or associations between these sites will have 'associative value'. Associative value is linked to (but not limited to) visual association, and contributes to the setting, context and significance of a heritage asset. It also increases the sensitivity of those assets to developments which impact on their associative relationships.

The archaeological assessment in the Environment Statement emphasises what it terms the 'isolated' nature of Trigon Hill barrow (ES para 11.5.3). However, this is

misleading: it might be a *single* barrow, but it is intimately associated with its surrounding historic landscape and it also has an associative relationship with a series of companion barrows in the area (also scheduled monuments). Indeed, the position of Trigon Hill barrow as the highest in the area may well have conferred upon it particular status amongst this group.

The associative relationships most relevant to the present development proposal are those between Trigon Hill barrow and any contemporary archaeological remains in the adjacent historic landscape, and the physical and visual relationship between Trigon Hill barrow and the barrows to the south and west. These relationships contribute to the setting and significance of Trigon Hill barrow, and that of other associated barrows in the area. The surviving ridge containing Trigon Hill barrow, and the ridge slopes below, form a key part of the associative link, enhancing the heritage significance of this landform, and also increasing its sensitivity to development. It is precisely this area that would be impacted by the proposed quarrying.

The potential impact of the development on affected heritage assets

To summarise the heritage significance of the surviving historic landscape setting of Trigon Hill barrow:

- The historic landscape setting of the Trigon Hill barrow, and the physical and visual relationship of the barrow to its surroundings, are of key importance to its heritage significance.
- Trigon Hill and its accompanying ridge is deliberately 'landmarked' by the barrow. The natural landform here underpins the very existence of the monument. It forms the primary setting and context of the barrow and is fundamental to the heritage significance of the barrow in historic, archaeological and visual setting terms.
- The barrow's setting on the ridge, and its relationship to lower-lying areas to the south and west, are of key importance to its archaeological context and setting, and its associative relationship with other archaeological sites and monuments.
- The survival of the historic landform here as an authentic and integrated whole is fundamental to the experience of the monument in its surroundings, and to the study, understanding and appreciation of the archaeological and landscape context of the barrow in its setting.
- Previous quarrying has effectively removed the historic landform around the NE, E and S sides of the barrow, which greatly increases the sensitivity of its setting to the effects of further new development, and places increased value on the surviving historic landform in the west and north quadrants.

The setting of the barrow on the west and north sides thus has particularly high heritage significance, and at the same time is highly sensitive to the impacts of new quarrying development. Any further significant encroachments by modern development into the remaining historic landscape around the barrow would be

harmful to the setting and significance of the monument, both in its own right and cumulatively with the previous developments. We therefore consider that retention of the historic landscape and landform to the west and north-west of the barrow, linking with the wider landscape outside the application site, is essential.

The proposal involves the quarrying along the ridge to the west and north of Trigon Hill barrow. The development would remove the last remaining section of historic landform surviving around the barrow (apart from a proposed margin of c.30m). This would be followed by backfilling and the formation of a new land surface, which in places might superficially resemble parts of the existing historic landform but which would not replicate or reinstate the historic landform in all its complexity and historic time-depth. We consider that the impact of this development, in combination with the previous mineral extraction here, would be seriously harmful to the setting and significance of the scheduled monument of Trigon Hill barrow, and could also have a harmful impact on heritage assets with which Trigon Hill barrow has an associative relationship, including scheduled barrows in the surrounding landscape.

Mitigation proposed in the application

In order to arrive at a balanced assessment of the overall heritage impact of the proposed development on affected heritage assets, account needs to be taken of measures proposed in the application to mitigate impacts on the setting of Trigon Hill barrow outlined in the Environmental Statement (paras 11.6.6 – 11.6.8).

The development proposals include 'designed mitigation, in the form of slope restoration'. The restoration scheme, which would include part of the previously quarried area east of the barrow, would 'generally follow existing or consented landforms', and 'in the vicinity of the barrow...existing slopes will be reinstated on slightly extended profiles, thus reducing the angle of slope'. These areas will not actually replicate previous ground levels and some areas will be quite different (including areas to the north and south of the barrow where ponds are proposed). The application acknowledges that this may not recreate the exact former landform, but considers that 'the prominence of the barrow's position will be maintained'.

We disagree with this claim. The backfilling and restoration of some of the presently proposed and previous quarried areas to create some semblance of the former landscape would clearly be better than an open unrestored quarry, and to that extent would help to mitigate the adverse visual impact of further quarrying here. However, the application assessment and its mitigation proposals are focused here on generalised and superficial visual considerations. The position of Trigon Hill barrow, in its recreated landscape surroundings, might technically be visually 'prominent', but this will be within an artificial landscape which is fundamentally different from the pre-quarrying landscape: the actual historic landscape setting of the barrow will not be maintained. The landscape produced by partially infilling the quarried areas would be a new construction, creating only a general semblance of the original historic landform, and retaining nothing of the authenticity, integrity, complexity, time-depth and archaeological interest of the existing landscape here which forms such a key part of the setting and significance of the barrow.

The application also proposes, as mitigation or offsetting, ‘enhancement of the current setting [of the barrow] through positive management’, though a Heritage Management Plan (HMP) for the barrow, details of which it proposes would be provided post-determination (ES para 8.9.2).

We appreciate that the proposed Heritage Management Plan for the barrow would bring conservation benefits (although see our comments and further recommendations in the final section of this letter). However, we consider that, overall, these proposed mitigation measures, singly or together, would be far outweighed by the harm brought by the development, and in our view they would not compensate for the irreversible harm to the setting, context and significance of Trigon Hill barrow brought by the loss of the surviving historic landform around it.

The application assesses that, overall, the proposed development will have only a *minor negative* effect on the setting of the monument and result in a *neutral effect* on the significance of the heritage asset (ES para 11.6.8). It concludes that the development would bring ‘no perceived effect on the significance of the asset as a result of changes in its setting’, and therefore would cause no harm (ES para 11.7.1). Again, we disagree, and consider that the application significantly underestimates the level of harm that the development would cause to the setting and significance of the scheduled barrow. As mentioned above, the heritage setting assessment in the application focuses on general visual considerations, and does not take sufficient account of the fundamental importance of the historic landform to the setting, associative value, archaeological interest and heritage significance of the monument. Nor does it take sufficient account of the cumulative effect of the proposed extraction in combination with previous mineral working here.

In our view, the removal, through quarrying, of the last remaining section of historic landform around Trigon Hill barrow, and its replacement with an artificially created land surface would be an irreversible change, causing the loss of the integrity and authenticity of historic landscape surroundings which now form the primary historic setting and archaeological context of the barrow. In separating the barrow from its archaeological and topographical context, the proposed development would critically diminish the experience of the monument in its surroundings, and the ability for study, appreciation and understanding of the monument in its historic setting.

Taking all these factors into account, including the proposed mitigation, we consider that the impact of the proposed development, in combination with the previous mineral extraction here, would be seriously harmful to the setting and significance of the scheduled monument of Trigon Hill barrow, and could also have a harmful impact on heritage assets with which Trigon Hill barrow has an associative relationship. We consider that the level of harm would (in NPPF terminology) be **substantial**.

Relevant national planning policies

Relevant NPPF policies relating to the historic environment are set out in paragraphs 126-141.

Under the NPPF it is a **core planning principle** to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their

contribution to the quality of life of this and future generations (NPPF para.17). When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Whilst some other planning concerns are given similar weight (including mineral extraction), none are given a greater sense of importance in the NPPF. The more important the asset, the greater the weight should be.

Paras 128-129 relate to the information on heritage assets required with an application, and which need to be considered by the local authority. NPPF para.129 states that local authorities should 'identify and assess the particular significance of any heritage asset that may be affected by a proposal' and 'take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal'.

Paras 131-137 relate to impact of development on heritage assets.

The significance of a heritage asset can be harmed or lost through alteration or destruction of the asset or development within its setting. As heritage assets are irreplaceable, any harm (whether substantial or less than substantial) is to be given **great weight**, and any harm or loss should require clear and convincing justification (NPPF para.132). The onus is therefore on the local planning authority to rigorously test the necessity of any harmful works.

Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss (NPPF para 132). Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, should be **wholly exceptional**. If a proposal cannot be amended to avoid all harm, then if the proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal (NPPF paras.133-134).

Also relevant here are:

- NPPF para. 131, which states that, in determining planning applications, local planning authorities should take account of 'the desirability of sustaining and enhancing the significance of heritage assets', the 'positive contribution that conservation of heritage assets can make to sustainable communities', and 'the desirability of new development making a positive contribution to local character and distinctiveness'.
- NPPF para.137, which states that planning authorities should 'look for opportunities for new development ... within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably'.

- NPPF 144, concerning mineral working, which states (third bullet point) that when determining planning applications, local authorities should ‘ensure that there are no unacceptable adverse impacts on the natural and historic environment,...and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality;’

Also relevant are policies in NPPF paragraphs 7, 8, 9, and 17 concerning the overarching objectives for conservation and sustainable development, the need to take opportunities for enhancement and the importance of avoiding conflict, and the need to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. If, in the development proposal, conflict has not been avoided, or opportunity not taken for enhancement, or harmful impacts of the development not clearly and convincingly justified and adequately mitigated, then the development will not be sustainable and national planning policy indicates that the local authority should refuse the application.

Historic England position

As outlined above, Trigon Hill barrow’s setting on the ridge, and its relationship to areas to the west, are of key importance to its archaeological context and setting, and its associative relationship with other archaeological sites and monuments. The historic integrity and authenticity of the historic landform of the ridge and ridge slopes on the west and north-west side of the barrow - the landform which underpins the very existence of Trigon Hill barrow - provides the primary heritage setting and context for the monument, and is fundamental to the heritage significance of the barrow in historic, archaeological and visual setting terms. The survival of the existing landform here as an authentic and integrated whole, with all its complexity, time-depth and archaeological interest, is fundamental to the experience of the monument in its surroundings, to the study and understanding of the context of the barrow in its setting, and to associative relationships between the barrow and other archaeological sites in the area. The setting of the barrow on the west and north-west side thus has particularly high heritage significance, and should be given significant weight in the planning balancing exercise.

In 2016 we responded to the proposal for amending the restoration plan for the quarried area east of Trigon Hill to restoration at a lower level than that originally agreed. We initially objected to the proposal due to the increased harm it would bring to the visual setting of the heritage asset, but subsequently accepted that the case had been made that insufficient landfill was material available. However, our acceptance of the reduced restoration ground levels here was on the understanding that the historic landform of the ridge north and west of the barrow would remain intact and free from new quarrying development.

In response to the 2017 Scoping Opinion request, and at a subsequent site meeting we advised that *‘the surviving historic landscape setting of the barrow is highly sensitive to further changes due to modern development, in particular to the removal of the local landform, which would result in significant harm to the integrity, form and appearance of the monument’s setting’....‘any development proposal which would result in the barrow being left as an isolated feature within a man-made landscape*

would not be acceptable to Historic England. Retention of the historic landscape and landform to the west and north-west of the barrow, linking with the wider natural landscape outside the application site, is in our view essential.' This is still our view. Any further significant encroachments by modern development into the historic landscape around the barrow would be harmful to the setting and significance of the monument, both in its own right and cumulatively with the previous developments.

We consider that the impact of the proposed quarrying and restoration scheme, in combination with the previous mineral extraction here, would be very harmful to the setting and significance of the designated heritage asset of Trigon Hill barrow, both for the period when the barrow would be isolated and inaccessible within active mineral workings, and afterwards when the monument would be isolated within a newly-constructed landform.

The mitigation measures proposed by the applicants, through partial infilling and landscape restoration of the quarry, and improved management of the barrow, would in our view be far outweighed by the harm brought by the development, and would not compensate for the irreversible harm to the setting, context and significance of the barrow brought by the loss of the historic landform. As such, we do not consider that the application is in accord with NPPF para 131 regarding the desirability of 'enhancing the significance of heritage assets... and making a positive contribution to local character and distinctiveness'; nor (NPPF para 137) for new development within the settings of heritage assets 'to enhance or better reveal their significance' or 'preserve those elements of the setting that make a positive contribution to, or better reveal, the significance of an asset'.

The potential harm to designated heritage assets that would be caused by the proposal is an important material planning consideration where the conservation of heritage significance and avoidance of harm should be given great weight. Overall, (and taking into account the potential for mitigation and offsetting described in the application), we consider that the harm to the Trigon Hill barrow that would be brought by the proposed development would (in NPPF terminology) be **substantial**.

The substantial harm that would be brought by the proposal does not have clear and convincing justification and it has not been demonstrated that it would be outweighed by substantial public benefits, or that wholly exceptional circumstances apply here, as required by national planning policy. In our view, the proposal does not satisfy the requirements of NPPF policies in paragraphs 131, 132, 133, 137, 144. It is also not in accordance with policies in NPPF paragraphs 7, 8, 9, and 17: the proposal does not sustain or enhance the significance of the heritage asset in its setting, does not avoid conflict, and does not conserve the heritage asset in a manner appropriate to its significance, so that it can be enjoyed by this and future generations.

Recommendation

The potential harm to designated heritage assets that would be caused by the proposal is an important material planning consideration where the conservation of heritage significance and avoidance of harm should be given great weight. Overall, (and taking into account the potential for mitigation and offsetting described in the

application), we consider that the harm to the Trigon Hill barrow that would be brought by the proposed development would (in NPPF terminology) be **substantial**. The substantial harm that would be brought by the proposal does not have clear and convincing justification and it has not been demonstrated that it would be outweighed by substantial public benefits, or that wholly exceptional circumstances apply here, as required by national planning policy. In our view the proposal does not satisfy the requirements of NPPF policies in paragraphs 131, 132, 133, 137, 144, and is also not in accordance with policies in NPPF paragraphs 7, 8, 9, and 17. We therefore **object** to the application and recommend **refusal**.

Next steps

We consider that there may be limited potential for quarrying in the northernmost area of the application site, providing any such development includes sufficient mitigation and offsetting to balance any harm caused to the setting and significance of Trigon Hill barrow and any other affected heritage assets. In the following section we outline criteria which could in our view achieve an acceptable scheme.

Retention of key areas of historic landform.

Subject to further detailed assessment of the landscape setting of Trigon Hill barrow, there may be potential for quarrying in the northernmost area of the application site, furthest from the barrow, providing this retains sufficient historic landform to maintain the significance of the monument in its setting. For reasons given in the letter above, we consider that the retained land should include:

- the surviving 'peninsular' of intact ground containing the barrow,
- the crest of the ridge upon which Trigon Hill stands, and
- land on the ridge slopes opening out westwards from the area of the barrow towards Hyde Heath and the Piddle valley.

In order to achieve this, any quarrying development would need to be limited to the slope below the crest of the ridge, with its southern boundary located an appreciable distance to the north of the barrow and running in an approximately north-westerly direction, in order to maintain the historic physical and visual relationship of the barrow to the landscape on this side.

Even with these limitations, mineral extraction here would still have a harmful impact on the setting of the barrow, due to the impacts of quarrying and restoration activities during operations, and the irreversible destruction of a section of the landform of the ridge that forms a key element of the landscape setting and archaeological context of the barrow. We therefore consider it essential that any quarrying development here should include provision for offsetting and mitigating the harm through measures which (in the terminology of national policy and guidance) sustain and enhance the significance of the heritage asset, make a positive contribution to local character and distinctiveness, enhance or better reveal the significance of the monument, and preserve those elements of the setting that make a positive contribution to or better reveal the monument's significance (NPPF paragraphs 131 and 137; *Planning Practice Guidance: Conserving and enhancing the historic environment*, para. 020).

Restoration of quarried areas to their historic ground levels.

With this in mind, firstly and most importantly, we would expect any post-extraction restoration scheme to include reinstatement of the quarried areas within the setting of the barrow *to historic ground levels*, both within any newly quarried areas and in the previously quarried areas around the barrow, with priority given to accurate reinstatement of the crest and slopes of the ridge top on which Trigon Hill barrow stands. In view of previous problems in achieving originally consented ground restoration levels at Trigon Hill quarry, the question of materials balance in any proposal will need especially close scrutiny.

Heritage Management Plan

Secondly, we would expect any quarry development here to include provision for a Heritage Management Plan (HMP) for Trigon Hill barrow and key elements of its setting, notably its near surroundings and key sightlines to and from the barrow. The current proposal includes provision for a HMP, details of which it proposes would be provided post-determination (ES para 8.9.2). We recommend, however, that a HMP should be drafted as part of any application, in order to confirm the objectives and management strategies and to deal with any potential problems at an early stage prior to determination, with the final approval secured through a planning condition post-determination.

We would expect a HMP to include provisions for management of vegetation and burrowing animals on and around the barrow, with vegetation management extending around the barrow (we suggest a minimum 50 metre radius) and extending beyond this along key selected sightlines between the barrow and the surrounding landscape. The provision of sightlines would require appropriate layout and management of vegetation (especially trees) in the wider restoration area beyond the 50 metre radius. In the wider area, large continuous areas of woodland planting west of the barrow (such as that in the present proposal) would not be appropriate if they blocks open views across the landscape which are significant for the setting of the barrow. Planting proposals would need to be reviewed closely and where necessary amended to provide open and distant views to and from the barrow in key directions.

These measures, which are in line with national planning policy and guidance, will not remove the significant level of harm brought by mineral extraction to the setting and significance of Trigon Hill barrow. However, taking into consideration the particular circumstances here, we consider that these measures, if fully implemented, could help to offset and balance the harm, and might enable a development scheme to be delivered in a sustainable and appropriate way, thus meeting the requirements of national planning policy.

We would be happy to discuss this advice with the applicants and the planning authority in due course.

Yours sincerely,



Keith Miller

Ancient Monuments Inspector

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