



# Consultee Response to SITA Additional Information

**Consultee**  
St.Dennis Anti Incinerator Group (S.T.I.G.)

## *Cultural Heritage*



**In Respect Of**  
Planning Application to Cornwall County Council  
Application No. 08/00203/WAS

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### Section 25 Cultural Heritage

(See also Section 20; Landscape and visual effects)

(See also Sections 10.2 and 11 of Response to Regulation 19 request)

S.T.I.G. considers that SITA has badly under-estimated the impact on the cultural heritage of the area affected by the proposed construction of an incinerator.

#### Objection from English Heritage and Restormel Borough Council

We fully agree with the view of English Heritage as set out in their letter of 11 November 2008, as below:

*"It is our belief that the proposals are disappointing in that they fail to recognise, let alone address, the impact that the proposals will have on the wider landscape of the St Dennis Area ... the scale, mass and orientation of the proposed plant is such that it will introduce an alien feature, unconnected with traditional or previous land-use, into a landscape that has been shaped by its natural resources, agricultural land and china clay. In addition the design, scale and massing of the building do not appear to have considered their place in the landscape."*

Restormel Borough Council takes a similar view and has commented that:

*"The development would cause harm to both landscape character and the wider setting of both Grade II\* listed buildings within the vicinity of the proposal, but in particular views to and from St Denys Church, contrary to Policy 2 of the Cornwall Structure Plan 2004, Policy 33 of the 2001 Restormel Local Plan and the Guidance as set out in PPG15 - Planning and the Historic Environment 1994. The guidance on tall buildings advises us that to be acceptable, any new tall building should be in the appropriate location, should be of excellent design quality in its own right and should enhance the qualities of its immediate location and wider setting, and that it should produce more benefits than costs to the lives of those affected by it."*

English Heritage in their latest correspondence go further and have assessed the impact on the "nationally important hill fort site of Castle an Dinas" and notes that "the plant will be clearly visible from this monument and of such a scale that it will become the dominant feature in the view to the south from Castle an Dinas."

It remains our view that SITA has not properly addressed the above issues (see Section 11 of Response to Regulation 19 request).

We have studied the new photomontages supplied by the applicant and find many to be inaccurate and deliberately misleading.

S.T.I.G. provides its own photomontages, which provide a far more honest representation. (See section 7 of this document)

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### **Anciently Enclosed Land (AEL)**

The County Council's request (Section 20, response 9.9) correctly notes that the farmland to be affected by the construction of the incinerator and the access road is Anciently Enclosed Land (AEL). We agree that the County Council is right to question why the land in question is considered by SITA to be only of "low or medium importance" when it is described in the Cornwall Landscape Assessment (1994) as a "zone of very great importance."

S.T.I.G. fundamentally disagrees with SITA's assertion that the land to be affected is not significant because it is only a small part of the AEL that extends across much of Cornwall and is in an "unattractive setting ... adjacent to china clay works."

We take the opposite view. We maintain that it is because so much farmland has been lost to the china clay industry over the last 200 years, this section of AEL, positioned close to the communities of St Dennis and Treviscoe, is demonstrably more important than AEL in other parts of Cornwall.

The land to be affected is associated with the farmsteads of Bodella and Rostowrack, which are both of great longevity. The first documentary reference to Rostowrack was in 1211 and both settlements contain Cornish place-name elements which suggest that the farms are early medieval in date (i.e. they predate 1000AD) and the attached field systems are potentially of a similar date.

We maintain that the site and associated fields form an important part of the historic fabric of the land to the north of St Dennis. The historic fieldscape, the ancient hedges and associated footpaths should be protected and not lost.

### **Hedgerow Regulations**

In Section 10.2 of the response to the Regulation 19 request, SITA state that "*the Cornish hedges on site are not definable as hedgerows under the Hedgerows Regulations (1997), because of a lack of continuous plant cover.*"

We understand that there is often confusion with the Regulations because of the difference between Cornish stone-faced banks and hedgerows found elsewhere in Britain, but disagree with SITA's view.

We would refer Cornwall County Council to the appeal decision (APP/HGW/03/269) at Glebe Land, Fore Street, Cuby, Tregony, following Carrick District Council's decision to refuse to allow a section of hedge to be removed. The decision clearly makes the point that when the vegetation on top of a bank is trimmed and kept low as near St Dennis, Cornish hedges are still covered by the Regulations as a "hedgerow ... could be present."

We would expect the County Council to look again at this issue and whether the correct procedures have been followed.

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### Removal Of Cornish Hedges

It is still our view that Restormel Borough Council's objection that *"the proposal would harm the countryside through the loss of agricultural land and hedgerows contrary to the advice of policies 3 and 18 of the Restormel Local Plan, PPS7 and the draft RSS"* is still appropriate.

We note that SITA give considerable detail as to how they will create new hedges based on guidance from the Cornish Hedge Group.

It is our view the Cornish Hedge Group's advice on how 'new' Cornish hedges should be constructed is sound. But in the case of the proposed works near St Dennis, it needs to be noted that the 331m of existing hedge, which is under threat, contain a one thousand years worth of valuable information, reflecting both its history and its natural make-up. Reusing the soil and stone from the removed hedge does not mean that a historic feature will be recreated.

We do not accept SITA's argument that the historic boundaries are being 'translocated.' The majority of the 1000m of new hedges will be completely new constructions and only one third or less will reuse material from the lost banks.

Furthermore, some of the 'translocated' banks will be on the edge of the incinerator and the plant will visually over-power any such feature. The construction of new, modern hedges where none presently exist, (i.e. along the access road) will also change the character of the existing landscape which we consider to be of great value as it presently exists.

We consider that the amount of information and value (both historic and natural) within such historic boundaries is predicated on their continued existence in their present positions. Their integrity as historic features will be lost entirely if they are removed.

The removal of such boundaries would also lead to the inevitable loss of habitat and life for local fauna.

### Area of Great Historic Value at Trerice Bridge

As local residents, we are concerned at the manner in which the Area of Great Historic Value at and around Trerice Bridge has been treated by the authorities in the recent past and how SITA could undermine the integrity of the AGHV to an even greater extent with the construction of the northernmost section of the proposed haul road.

The AGHV was created because of a number of historic features in close proximity which included the 19<sup>th</sup> century bridge, the site of a stamping mill and farm on the eastern side of the bridge, the railway line and the remains of the crossing gate house and, to the north west of the bridge, the Wheal Remfry Brickworks.

The brickworks survive as historic features and the remains include a square red brick chimney, which is still visible. The footings of the crossing gate house also

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survive though the construction of the new road to by-pass Stamps Hill caused a small amount of damage to the remains of the structure when the road alignment to the south of the bridge was tweaked.

SITA have attempted to downplay the significance of the designation stating *“the archaeological interest and historic features of the surrounding AGHV have very little visual presence and are integrated within the woodland.”*

It remains our view however that the construction of a road through the AGHV would cause considerable further damage to the integrity of this area.

Though classified for its historic importance, we are also concerned at the likely removal of vegetation in the AGHV, which includes dense undergrowth and up to eight different species of reasonably mature trees.

This area is also a wildlife habitat and there are numerous bird boxes *in situ* beside Trerice Bridge. Barn Owls and Tawny Owls are known to frequent this area and the new haul road would cause major disturbances to wildlife including bats and many mammals such as badgers in the area.

We are extremely disappointed that this has not been taken into account.