Mulberry House Group

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16 August 2024

Messrs C Powers and T Havard
Planning Officer
Wiltshire Council
Bythesea Road
Trowbridge
BA14 8JN

By email only

Dear Mr Powers and Mr Havard

Ref: PL/2023/02992 - Application in respect of 14 Sustainable and Sustainably developed Holiday Villas

This is in response to your recent comments dated 2 August 2024, posted on the Wiltshire Planning portal and also in regard to your earlier comments addressed to my colleague, Carolyn Owen, regarding the report of our specialists on the lack of archaeology at this small, lowland site.

We do, of course, take note of your observations regarding your perception of the presentation our report , we saw no direction as to what further information may be required for the application process. We are sorry to learn that you question the authority of the consultant archaeological experts noted in our report, including the following:

https://archaeologydataservice.ac.uk/archiveDS/archiveDownload?t=arch-906-1/dissemination/pdf/EUS_Figure_Scans/EUS_fig1.dwg-Model.pdf

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50 High Street | Highworth | Wiltshire SN6 7AQ
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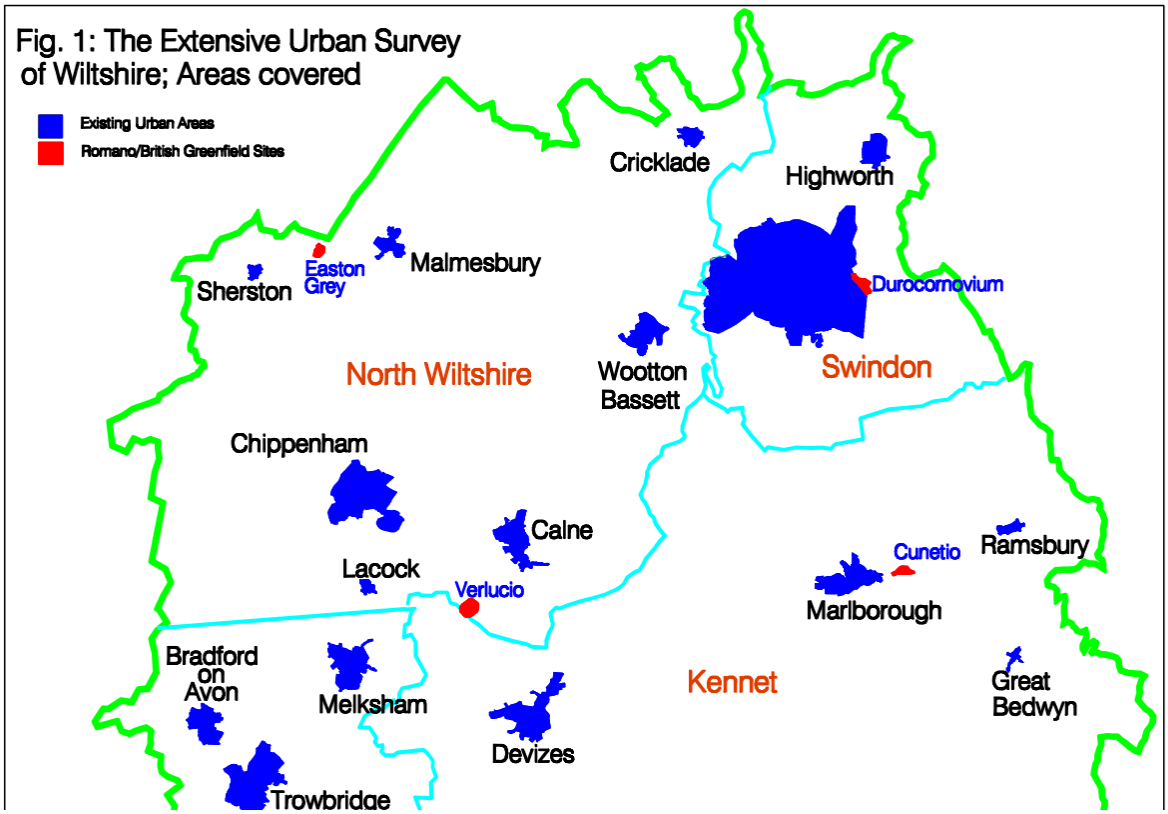

Extract of Map deployed

https://historicengland.org.uk/listing/the-list/map-search?clearresults=True&postcode=SN6%206HZ

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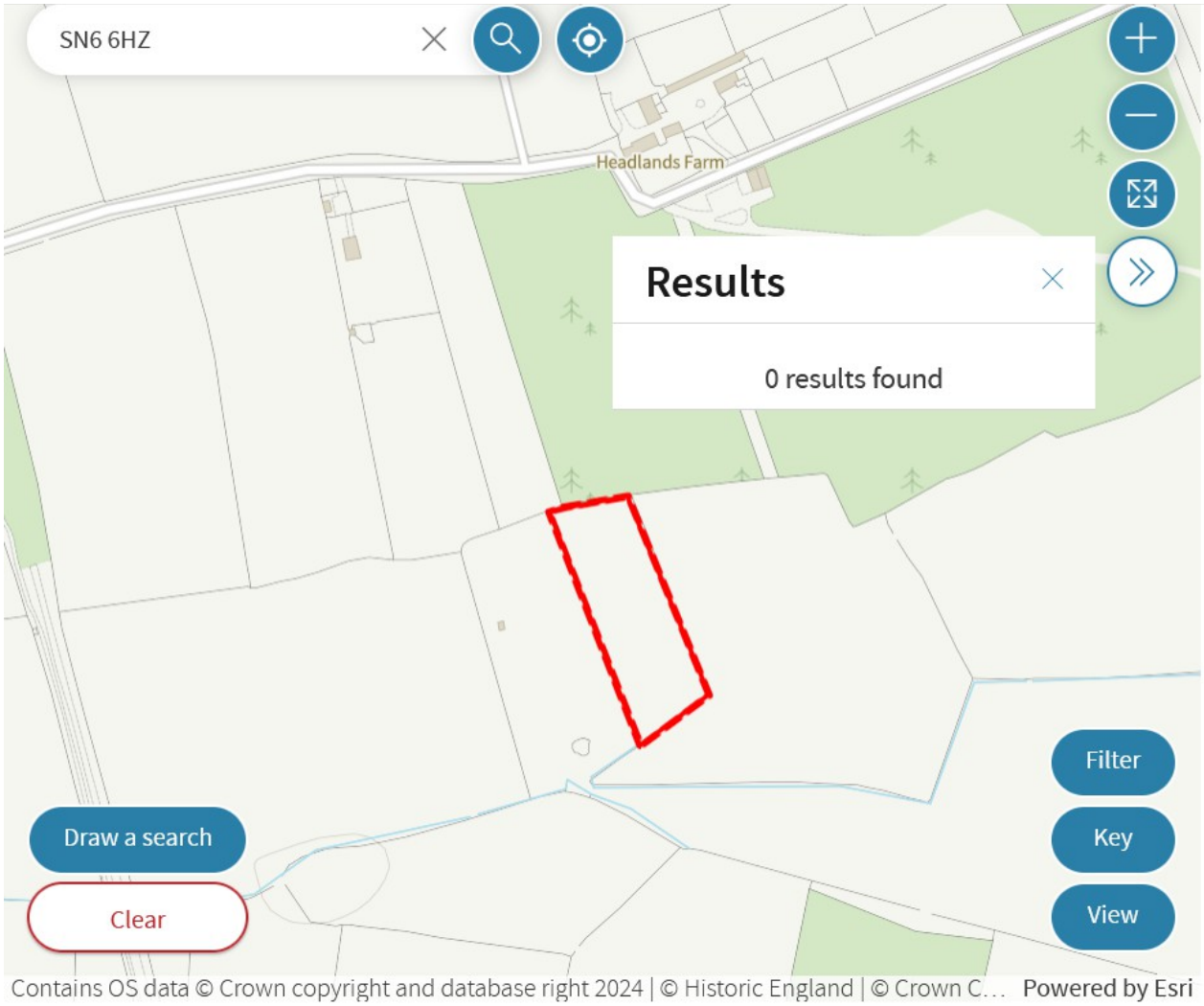

This map shows the locations of listed buildings and sites. It doesn't show the full extent of the structures protected by each listing

Wiltshire Council (2009) *Extensive Urban Survey - Wiltshire* [data-set]. York: Archaeology Data Service [distributor] https://doi.org/10.5284/1000061
The project was carried out on behalf of Wiltshire County Council who acted as archaeological advisors on planning matters for the Wiltshire County Council and Swindon Borough Council, and maintain the Sites and Monuments Record for both Authorities.

A number of people were involved in drawing up the EUS. Tim Robey and Stephanie Chettle, started the project before Phil Mcmahon took over from them both in 2000. The bulk of the reports were complied by Phil Mcmahon, with the assistance of Bill Moffat for Sorviodunum, and Duncan Coe for Devizes and Marlborough. On Phil Mcmahon's departure

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the remaining reports were completed by Roy Canham, (mainly Swindon), Helena Cave-Penney (mainly Salisbury), Claire Young, undertaking research and finalising the drawings and, Margaret Underwood finalising the text.

https://opendomesday.org/place/XX0000/lower-and-upper-widhill/ Emeritus Professor John Palmer (University of Hull

The Transformation of Rural England, University of Exeter Press, (2002) Tom Williamson, Emeritus Professor School of History and Art History

Ancient Woodland in England: Historical Perspectives on a 'Natural' Habitat, Williamson, T., 16 Jan 2024, *Woodlands: Ecology, Management and Threats.* Rotherham, I. D. (ed.). New York: Nova Science Publishers, Inc, p. 35-54 20 p.

'Cricklade - Outer Cricklade', in *A History of the County of Wiltshire: Volume 18*, ed. Virginia Bainbridge(Woodbridge, 2011), *British History Online* https://www.british-history.ac.uk/vch/wilts/vol18/70-108 Dr.I Virgina Bainbridge, University of West of England, University of Cambridge, Royal Holloway College, PhD, Medieval History, VH Galbraith Research Fellow, University of Oxford, Assistant Editor, Victoria County History, University of London,

https://www.nottingham.ac.uk/manuscriptsandspecialcollections/researchguidance/weightsandmeasures/measurements.aspx University of Nottingham, Hayley Cotterill, Keeper of Manuscripts and Special Collections, Kings Meadow Campus, Lenton Lane, Nottingham, NG7 2NR

Ditial Methods and Remote Sensing in Archaeology: Archaeology in the Age of Sensing, 2017,
Springer, New York. Forte, Maurizio, editor; Campana, Stefano, editor
Maurizio Forte, PhD, is William and Sue Gross Distinguished Professor of Classical Studies Art, Art History, and Visual Studies at Duke University. Stefano Campana. Professor of Landscape Archaeology, University of Siena, Dept of History and Cultural Heritage

Environmental Archaeology: Principles and Methods (2005) Tempus, Stroud. T O'Connor and J G Evans. **Terry O'Connor** is a professor of zooarchaeology at the University of York and the author of *The Archaeology of Animal Bones*. **John Evans** is a professor of archaeology at the University of Wales, Cardiff and author of the pioneering *An Introduction to Environmental Archaeology*.

The Agrictultural Revolution in Prehistory (2006), Oxford University Press. Professor Graeme Barker

Paleoethnobotay: a Handbook of Procedures (2015), Left Coast Press, Walnut Creek, CA. Professor Deborah M Pearsall

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Beyond the research of acknowledged authorities in the field, cited above, our site and related information derives from Wiltshire Council's own data and the Magic portal with the local council data, Heritage England, which itself includes Lidar survey, as follows:

The Sources deployed by Magic Maps include:

Natural England
Environment Agency
DEFRA
Historic England catchment abstraction management all council regions
All council administrative boundaries
Data on all Ramsay sites
Areas of specific scientific interest
Special areas of Conservation
Special protection areas
Historic battle fields
Parliamentary constituencies
All local Parish councils
Local enterprises partnerships
Rural England prosperity fund
Local nature partnership
Lower super Output Areas with Rural Def 2011
Watsonians vice council
All statutory land based designation
Areas of outstanding natural beauty
National and local nature reserves
Possible special areas of conservation
Special protection areas
Biosphere reserves
Scheduled monuments
World heritage sites
Community forests
Green belt
Heritage coasts
Land management initiatives
National forest
RSPB reserves
Upland experiment areas
Countryside stewardship agreements
SEI moorland standard survey
Aquifer designation bedrock and Superficial drift
Ground water vulnerability
Geological places to visit
Soilscape
National grafter areas
National historic landscape characterisations
Agricultural land
Post 1988 Agricultural Land
Landscape topography
National trails
National cycles network
Country parks
Registered common land
Rights of Way Act

Together, all these sources provide a fully detailed in-depth analysis of the specific site.

Our question therefore is can you please explain why the senior highly qualified archaeologists and the data specific to the site prepared and one would presume verified by yourselves from all Council and associated bodies is unacceptable to you?

The TCPA provides for a reasonable requirement for information to be supplied for an application. This is after all a minor development in an area that has been proven to hold no historical or archaeological interest. Would it be fair to assume that by objecting to our application on the grounds that you prior knowledge? Has some find archaeological importance been made on the site in the last 12 months?

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Were this to be so, should not such information have been shared with the publicly and the data stored and published for future applications? Upon grant of planning consent, we would welcome further input from you at the time of build and would even invite you to do any additional survey prior to commencement of construction if you have additional knowledge of the site. If there is some reason why you reasonably consider that the objection conditions of the legislation and guidance have not been met by the depth and provenance of the research underlying our report, please support your reasoning with evidence.

Yours sincerely

Brian A Morrison

Brian Morrison
Senior Partner
Mulberry House Group

Cc: Mr D J Cleverly, Planning Consultant

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