

Historic Multi-Period Landscape Assessment: Objection to PL/2026/02717

Application Reference: PL/2026/02717 Bellway Homes / Home Farm.

Address: Land at Home Farm, Boreham Road, Warminster.

Name : Al Wright.

Nature of Objection: Material Objection – Failure to Evaluate a Regionally Unique Prehistoric Mega-Henge, Complete Severance of a Multi-Period Landscape Matrix, Destruction of the Last Open Valley Corridor and associated rare buried archeology.

Dear Mr. Brown,

I am writing to register a profound objection to the proposed residential development at Home Farm .

While I acknowledge the statutory response from the Assistant County Archaeologist mandating a standard Strip, Map, and Record (SMR) condition, I strongly challenge the administrative premise of that response. The current approach treats Home Farm as an isolated pocket of soil to be "mitigated by destruction and record." This completely violates Section 16 of the National Planning Policy Framework (NPPF), which legally requires the Local Planning Authority to evaluate and conserve the **significance** of heritage assets based on their full landscape context, connectivity, and rarity.

This 11-hectare site is not an empty space; it is the vital, active heart of an unbroken, 8,000-year macro-archaeological landscape. The extraordinary concentration of interconnected features within a 1km radius makes this landscape globally rare. To evaluate it as anything less is a failure of planning policy.

1. The Deep-Time Landscape Evolution of the Boreham Plain

The archaeological profile of Home Farm demonstrates an exceptional sequence of **Landscape Continuity**, where successive generations for 8,000 years continuously inhabited, adapted, and built upon the exact same spatial infrastructure of power:

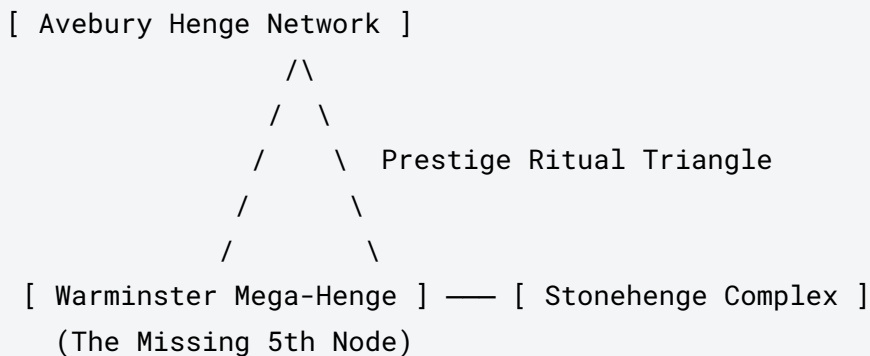
- **The Mesolithic Foundation Stone:** Decades of empirical fieldwork, field walking, and targeted trenching on this exact site have uncovered a rare **Late Mesolithic industrial knapping site and seasonal camp**, featuring an intact **prehistoric hearth, burnt flint scatters, and structural postholes**. This camp is the literal **foundation stone** for the entire civilization chain that followed. This site established the primary human footprint on this vital low-terrace river margin.
- **The Neolithic Processional Corridor:** During the Neolithic period, this river terrace transitioned into a highly structured sacred landscape. Peer-reviewed surveys by archaeologists Bruce Eagles and David Field [CranborneChase] prove that long barrows are not randomly scattered but are **spaced with remarkable uniformity at 2km intervals directly down the River Wylye corridor** (Corton, Boyton, Sherrington, Stockton, Norton Bavant). This regular spacing marks an ancient ceremonial processional route following the river plain. Crucially, **King's Barrow represents the exact geographical and ritual pivot point of this entire system**. It is at this precise low-terrace bluff that the valley-floor path changes direction, turning to head directly up onto the high plateau of Salisbury Plain. The open plain of Home Farm is the physical gateway where this river culture transitioned into the upland network.
- **The Bronze and Iron Age Specialized Elites:** As communities settled permanently on the valley floor, specialised control of trade led to the emergence of wealthy elites. Dr. Robert William Smith's (1985) research at Bishopstrow Farm and Watery Lane confirms the presence of a highly specialized valley-floor community that commanded immense wealth centuries before such practices became commonplace. This is evidenced by **exceptionally early Iron Age metalworking slag**, proving this was an advanced metallurgical hub, paired with **distinctly superior quality pottery fabrics** and pioneering, trend-setting burial practices that only became common centuries later.
- **The Rise of Hillfort Conflict:** As these valley-floor tribes grew in wealth and political power, regional conflict arose over the control of these vital valley bottlenecks. Upland hillforts like **Battlesbury Camp** and **Scratchbury Camp** were constructed on the dominant high ridges. These forts acted as defensive networks and centers of protective ritual process, directly overlooking and securing the productive farming plains below.
- **The Pax Romana and Pit Mead:** This defensive upland focus became obsolete when Roman rule demilitarised the province. Under the *Pax Romana*, regional security allowed a wealthy plutocracy to move back down onto the vulnerable valley floor. This shift resulted in the construction of the **Pit Mead Roman Villa complex**, an explicitly undefended, high-status

agricultural estate positioned directly on the fertile floodplain and tribal boundary, a few hundred meters from the Bishopstrow farm Iron Age Enclosure.

- **The Anglo-Saxon Estate & Parochial Topography:** Following the sub-Roman transition, the early medieval Anglo-Saxons formalised land divisions by grouping land into parcels called **hides**. Possession of five hides elevated a freeman to the high status of a **thegn**. These five-hide units directly evolved into the post-Conquest medieval manors, and their boundaries laid the foundations for the historical parish system. Each hide was intentionally configured to contain all the essential components for community self-sufficiency: upland downland pastures, fertile river-valley crop beds, woodlands, and freshwater access. This configuration explains why every historical parish boundary to the east of Warminster extends across the landscape in long, narrow, tube-like bands. These stretch from the Wylde floodplain right up onto the high plains of Salisbury Plain, as seen in the linear layout of Boreham Manor extending directly out to Boreham Down behind Battlesbury, running alongside the ancient parish boundary of Bishopstrow.
 - **The Motte and Norman Subjugation:** The extreme structural importance of this specific valley gateway is emphasized by the presence of the medieval **motte on Bishopstrow Farm**, positioned right at the end of the ridge before dropping into the Pit Mead plain. Located just 300 metres from the entrance of Home Farm, Boreham Manor sat in immediate proximity to the neighbouring Bishopstrow Manor (sited near the modern hotel's secret garden). The construction of this defensive motte at this close strategic crossroads served either as a fortified shield for the area's wealth or as a severe Norman military imposition built to subdue local Anglo-Saxon lords. Either case highlights the area's role as a route of high economic and military power.
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2. Omission of the Bury/Boreham Mega-Henge: A Nationally Significant Discovery

The single most critical failure of the developer's archaeological assessment is the total omission of the **Bury/Boreham Mega-Henge complex**, identified by renowned landscape experts David Field and David McOmish (*Neolithic Horizons*). This site has been left entirely un-evaluated by the current planning process.



The Rarity of the Resource

In the entirety of the United Kingdom, only four definitive Neolithic mega-henges are recognized (Avebury, Stonehenge/Durrington Walls, Marden, and Mount Pleasant). If confirmed through full systematic excavation, the Boreham complex represents **the fifth mega-henge in the UK**. The presence of an un-evaluated monument of this size makes its setting and landscape context exponentially more important than the current standalone scheduled monuments. The combined cultural value of this area rises significantly, revealing an ancient **Stonehenge–Avebury–Warminster prestige triangle** of interlinked ritual routes.

Structural and Civilisation Roles

This mega-henge was not an isolated monument; it operated as the central infrastructure for 8,000 years of valley culture:

- **The Processional Anchor:** The henge sat directly opposite King's Barrow, acting as the monumental anchor for the 2km spaced riverine processional route, managing the physical and spiritual movement of populations tracking up from the riverbeds to the high plains.
- **The Roman Veneration:** The monumental sacred status of the henge was directly respected and reused by the Romans. This is verified by major **Roman coin hoards** discovered directly within its boundary, indicating its continuous use as a ritual deposit site or an undefended regional market hub on the tribal boundary.
- **The Anglo-Saxon Burton "Burgh":** Following the Roman collapse, the early Anglo-Saxon elite

reused the massive enclosure probably as a fortified royal estate (*villa regalis*). This provides the definitive origin for the local toponymy: in medieval times, the interchangeable name for Boreham was **Burton**(*burh-tun*), meaning a **"town or settlement by a defended place or burgh."**

The elite class potentially lived inside this monumental enclosure, which explains why they targeted the adjacent King's Barrow for their high-status Warrior burials with weapon (the 443mm iron seax) and why they positioned the early Saxon church down-ridge at Bishopstrow. Paving over Home Farm without evaluating this mega-henge context represents an act of irreversible archaeological destruction.

3. Post-Medieval Capitalization & Historical Estate Consolidation

The post-medieval era saw a clear consolidation of agricultural power as medieval manorial systems transitioned into private estate ownership, directly utilizing the Home Farm open view-shed and access route.

- **The Fall of Boreham Manor:** Boreham Manor was positioned to directly oversee its vast agrarian holdings. This included unobstructed views looking northward up toward its upland pastures on Battlesbury Camp, seen straight across the open fields that now form the Home Farm application site, alongside views to the prehistoric Mega-Henge and its manorial watermill near the entrance. By the mid-1500s, the traditional feudal power of Boreham Manor began to wane.
- **Gifford Family Consolidation:** A new farming class, spearheaded by the probable owners of **Boreham Grange**(originally dating from 1556), began buying up the fragmented manorial lands. By 1663, through generations of calculated acquisitions, the Gifford family consolidated their holdings, buying out the original manor's estate, including its crucial demesne farm (the lord's own personal farm) Boreham Farm.
- **The Astley to Temple Lineage:** This massive consolidated estate passed down through centuries of private ownership, eventually shifting to William Buckler, then to his daughter, who married **Francis Dugdale Astley**. In 1810, Astley exchanged lands to secure a large, contiguous 300-acre block in Boreham north of the Wylde. In **1821**, Astley's trustees sold this complete northern estate to **William Temple** of Bishopstrow.
- **The Creation of Home Farm and Bishopstrow House:** William Temple bought this consolidated estate to create a grand, unified country seat. He commissioned the construction of **Bishopstrow House**(begun in 1817 on the north side of Boreham Road, now the Grade II listed hotel) and its associated parklands. Temple deliberately created **Home Farm** as a model agricultural farmstead to manage the working lands of the new estate.

4. The Unbroken Continuity of the Open Setting

This historical sequence reveals a vital planning fact: **Home Farm is the functional and historic link that binds these three significant estates—Boreham Manor, Boreham Farm, and Bishopstrow House—together.** It has served as their common agricultural, visual, and economic setting for centuries.

Even after William Temple purchased the lands and the old physical structure of medieval Boreham Manor faded, he respected the landscape's deep layout. He built a new residence for his sister on the exact same historic plot as the original Manor, placed right beside the ancient manorial fishponds and oriented to command an imposing, uninterrupted view of Battlesbury Camp and the un-evaluated Mega-Henge.

This deep historical continuity has survived intact right up to the present day. Paving over Home Farm severs the central link that explains why these listed houses, estates, and ancient structures were built here in the first place.

5. The Fallacy of Visual "Tree Screening" Mitigation

The developer's primary argument for landscape mitigation relies on planting trees to hide the housing layout from surrounding monuments. This methodology demonstrates a fundamental misunderstanding of heritage settings:

- **The Screening Counter-Effect:** Attempting to hide a 135-home development behind dense tree bands does not soften or mitigate the damage. The trees themselves actively sever the historic open view and setting. For a prehistoric landscape built around continuous, long-distance lines of sight, an artificial visual block is identical in harm to the houses it hides. The unobstructed view across an open valley floor is the key attribute of significance.
- **The Proximate Footpath Failure:** Up close, walking along the local public footpath network, the proposed tree planting has zero mitigating effect. It fails to mask the loss of rural openness or the introduction of domestic noise and suburban massing.
- **The Long-Distance Canopy Severance:** From an elevated distance (such as from Battlesbury Camp), what was historically a series of open agricultural fields is permanently transformed into a modern woodland canopy. The open viewshed is completely broken.
- **The Year 15 Failure:** The developer's claim that the visual harm drops to "negligible" after 15 years when the trees mature is false. Maturation simply means the visual connection is completely and permanently severed by tree bark and foliage, locking out the view for six

months every year, but once the trees shed their leaves the housing becomes a highly visible blight on the view and setting of each protected site.

6. Structural Critique of the Developer's Planning Assessments

Under the NPPF, the applicant is required to provide an accurate assessment of the **significance** of all affected heritage assets (both designated and non-designated) and use that baseline to measure the true level of development harm [Wiltshire-Local-Plan]. The submitted reports completely fail this requirement.

Rarity of Valley-Floor Resources Omitted

The developer's reports treat the site as a standard, empty field. They fail to acknowledge that **well-preserved low-valley floor settlements are exponentially rarer and harder to find** than upland sites. Dr. Robert Smith's (1985) research proves that valley margins like Boreham feature deep layers of **colluvial hillwash (colluviation)**. Rather than destroying archaeology, this deep wash caps and seals prehistoric living horizons.

Decades of independent field walking and trenching on this site since the 1970s have yielded a **100% success rate for finding archaeology**, whereas nearby **Westbury Road yielded zero finds**. Home Farm is a highly rare, sealed historical resource.

Deliberate Fragmentation of Impact Data

The developer has purposefully split their analysis into separate documents to obscure the total cumulative harm:

- The **Lichfields Archaeology Update** looks only at sub-surface remains.
- The **Lichfields Heritage Impact Assessment** claims in Paragraph 1.4 that it *scopes out* all built environment settings and leaves them to a separate statement.
- The **Pegasus Landscape and Visual Impact Assessment (LVIA)** states in Paragraph 1.14 that *heritage and ecology are beyond its scope* and limits its data strictly to "visible effects" from pre-selected viewpoints.

This fragmentation creates a **coordinated shell game**. By separating buried archaeology from setting, and setting from visual impact, the developer avoids analyzing how these assets function *together* as a landscape network.

By evaluating only whether a house roof can be seen from Battlesbury Camp, they completely ignore the **functional, spatial, and historical severance** of the landscape. They scope out the un-evaluated Mega-Henge, ignore the "Burton" Saxon *burgh* context, and completely fail to assess the importance of the non-designated assets that local field walking has proven crowd the lower terrace.

7. Statutory Planning Policy and Legal Precedents

To ensure the Council addresses these failures under standard planning laws, the applicant's errors are checked against statutory policies, previous planning assessments in the area, and definitive UK High Court case law:

National Planning Policy Framework (NPPF) Policies

- **NPPF Paragraph 207:** Mandates that ***applicants describe the significance of any heritage assets affected, including any contribution made by their setting.*** The applicant's failure to evaluate the adjacent Mega-Henge and the lower-terrace Mesolithic complex means the council lacks the necessary level of detail to determine this application.
- **NPPF Paragraph 212:** Establishes *that 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.* Severing the setting of a Scheduled Hillfort (Battlesbury) and a Scheduled Long Barrow (King's Barrow) carries substantial negative weight, along with significant harm imposed on the Mega Henge by isolating it from its roots and descendants.
- **NPPF Paragraph 208:** *Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise.*
- **In 2017 Wiltshire Council opposed Spurt Mead on the following grounds:**
- The appeal site lies outside the limits of development defined for Warminster in the Wiltshire Core Strategy (WCS). It is thus in the area where Policy CP2 of that Plan only allows for residential development through the plan led process of a Site Allocations Development Plan and/or a Neighbourhood Plan. The proposal would conflict with this Policy because it has not been brought forward through these means.
- In assessing the weight to be given to Policy C2 account must be taken of the background to the limits of development being located where they are in this part of Warminster. This can be found in the Inspector's Report on the West Wiltshire District Plan (2004) WWDP. This was the predecessor plan to the WCS from which current Core Strategy Limits of Development are drawn. At that time the Council had sought a "rural buffer" policy in this location. However, the local plan inspector recommended the deletion of this policy with reliance instead to be placed on policy limits "being drawn tightly around the built-up area of Warminster, in order to prevent coalescence with Bishopstow and to protect open countryside". The WDDP was amended accordingly. The appellant's claim that that the Limits of Development were established as result

of incorrect representations by the National Rivers Authority (NRA), and that in the absence of a gap Policy the Council cannot have considered the gap between Warminster and Bishopstow to be important, are thus strongly refuted.

- Given the Inspector's observations on the WDDL, and that the WSC is a more strategic plan, there has been no attempt to introduce a "rural buffer" policy. Instead the revision of the Limits of Development has been left to the Site Allocation DPD. And concerns on coalescence have been covered in Policy CP51 on conserving the separate identity of settlements and their landscape settings.
- It remains the Council's view that protecting the open countryside between Bishopstow and the development limits of Warminster remains important to prevent their coalescence. The application site is one of only 2 remaining fields on this side of Bishopstow Road that separate the built-up part of Warminster from the grounds of Bishopstow College in the village. The development of this site, prominent in views from Boreham Field and the B3414, would result in a significant part of the gap between the 2 settlements being lost thus undermining their separate identities.
- **The last Heritage Impact assessment done for the council in 2019 by LUC** describes in its methodology that it assesses effects on individual assets and in task five it does claim to assess the cumulative impact of multiple developments on the asset (singular) so does not assess the inter dependence or connections of multiple assets and their shared connective value except in relation to Bishopstow house, but this is only the tail end of a long story.
- The report goes on to state on page 21, paragraph 3.20 "that very extensive multi period remains are preserved across the site, ranging from Mesolithic through to medieval (**original Boreham**). The fact that Boreham village has already been merged with Warminster on one side and will merge with Bishopstow should the development proceed, is not taken further despite the medieval village remains clearly visible In the Robert Smith, 1970 assessment, and clear linear features on LiDAR see attached maps in appendix.
- The report lists all the unique underground archeology, which is highly likely to be destroyed by development, (significant harm) but then goes on to state in 8.16 that at present it is uncertain if they relate to definitive domestic structures or other features in the landscape, yet the site is surrounded by both an Iron Age enclosure (dwelling) at Bishopstow farm, and burial mounds from all eras, matching farm or domestic activity on site, hearths post holes and ditches etc linked to surrounding burial mounds, was this ritual, or living areas? but what more is required to prove this connection?
- The report fails to include either Boreham Grange, Boreham Manor, or the Henge related to their high status and ownership of the Home Farm site, again only looking at specific features without the setting context. The new Manor House is of 1860 ish date built by William Temple, Home Farm built in the same era, yet home farms link to Bishopstow house is important and the manor

isn't, despite it being the original site of the owners of the entire Boreham estate bought to create the key setting and agricultural hub of Home Farm.. No explanation of how the links between different assets are being attributed value, and why the manorial fish ponds and house location have no bearing.

- The final assessment marks part of the souther area as high archeological sensitivity ranging from Mesolithic to medieval but then only marks the medieval finds area as important, despite features being found across this area right to each boundary with no mention of why certain unique finds spots are being ignored and excluded from protection?
- No mention is made as to how the site ties together millennia of activity or how rare Mesolithic camp sites are, or how the surrounding ancient sites are linked and supposed to be connected by inter-visibility and access routes and has not been updated to include the 2019 Mega henge discovery, (see Archeology article in appendix.)
- **Historic England used this report and provided the following comments:**
- By allocating the site Historic England considers that the local authority has failed to: (Nppf para numbers refer to 2019 version but are still applicable).
- take sufficient account of its Heritage Impact Assessment to avoid or minimise harm (NPPF para 190)
- attach great weight to the conservation of effected heritage assets (NPPF para.193), and
- had due regard to the desirability of preserving the setting of effected listed buildings in accordance with S66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990.

Historic England therefore consider the Plan is

- unjustified in terms of impacts upon the historic environment;
- ineffective in terms of avoiding harm and delivering enhancements to the historic environment, and
- inconsistent with national policy

Local Planning Policies

- **Wiltshire Core Strategy - Core Policy 58 (Ensuring the Conservation of the Historic Environment):** Explicitly dictates that development should protect, conserve, and where possible enhance the historic environment. The permanent suburbanisation of this landscape boundary

directly violates this policy.

Binding Legal Case Law

The High Court and Court of Appeal have established strict legal parameters regarding heritage setting and the fallacy of "tree screening" mitigation:

- **The Principle of Cumulative Setting Harm (*Barnwell Manor Wind Energy Ltd v East Northamptonshire DC*):** The Court of Appeal ruled that finding "less than substantial harm" to a heritage setting does not mean a minor planning issue. The court clarified that the legal duty to preserve a setting means that any harm creates a **strong presumption against granting planning permission**, which cannot be overridden by standard housing gains.
- **Setting Is More Than Visual Lines of Sight (*Steer v Secretary of State for Communities and Local Government*):** The High Court confirmed that the "setting" of a heritage asset is not limited to pure visual sightlines. The court ruled that **historical, functional, and landscape connections** are equally vital parts of an asset's setting. The developer's focus on simple tree screening to hide rooflines fails to address the physical severance of the ancient valley-to-downland transhumance route.
- **The Inadequacy of Tree Screening (*R (on the application of Friends of the Earth) v Waverley Borough Council*):** Legal precedent confirms that screening a development with trees does not eliminate harm. Trees are a changing, temporary feature prone to disease and seasonal changes, whereas a housing estate is a permanent change. Blocking an ancient viewshed with a wall of vegetation is an adverse impact, not a mitigation strategy.

Conclusion

The Developers fragmented assessment is designed to mask the total destruction of a highly rare archaeological environment. The applicant has not provided sufficient information to understand the true significance of this multi-period landscape, and it is surprising that none of the information references the continual decisions by planning inspectors to draw a tight settlement boundary round the east edge of town, to prevent the coalescence of the two parishes, to prevent damage to the conservation area, maintain the individual character of each parish and maintain the last vestiges of a linkage between the hillfort landscape and the wylve valley floor below. The last heritage impact assessment used in the 2019 DPD showed why only the top north corner was potentially viable and only if it was in keeping with the surrounding area and could create access through the dene. This does not match the current plan and there is no justification as to why this development is less damaging than the previous one.

I request that the Local Planning Authority **respect the previous Planning Inspectors decisions, based on sound planning conservation reasons and refuses this application outright** : Not only does this development encroach past the acceptable threshold, but there is now significantly more

historic evidence being produced to back the protected status across a much wider area, that has not been adequately assessed by either the developer or Wiltshire council, so any decision will be undermined as inappropriate, unjustified, and challenged if based on insufficient assessments which will be classed as unsound.

Wiltshire Council has already been made well aware of what planning inspectors think of bringing forward insufficiently justified sites, and they would have to again provide evidence why less damaging sites couldn't have been used elsewhere as plenty are coming forward and available.

Wiltshire councils SA is meant to use this information to ensure only appropriate sites proceed. A shortage of houses is apparently not a reason to deviate from adequate assessments, if it were, the Local Plan would be being adopted now instead it had to be withdrawn as the base information used to allocate sites was insufficiently detailed, especially the SA.

Please review accompanying maps and images sent in Appendix for multi-period historic landscape assessment pdf, and Landscape views assessment pdf, as additional evidence relevant to this objection.