

## Part B – Please use a separate sheet for each representation

Name or Organisation:

Slimbridge Local History Society

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

<p><b>Protection of archaeology at PS37 Wisloe - Slimbridge Local History Society</b></p> <p><u>Heritage and education</u></p> <p>1. Slimbridge Local History Society (SLHS) has been working with the Ernest Cook Trust (ECT) for the last few years on parish land owned by the trust where a large Roman building in Stanborough Mead (the relationship to PS37 is shown on the map at paragraph 20) has been discovered. This discovery, and earlier discoveries on other land in the parish, has led to a community wide project to involve residents of all ages in learning more about their local heritage.</p>
---

2. Prior to the pandemic, society members took artefacts found during the project to Slimbridge primary school where the children, who were covering the Roman period as part of their curriculum, were able to handle and learn more about the coins, brooches and other artefacts. They also visited Marling School in Stroud where older students and staff proved eager to learn more to support their studies.

3. Despite the Covid restrictions numerous residents actively participated in the 2020 dig and assisted in washing and categorising the ceramic building materials recovered from the site. Understandably, there has been considerable parish-wide interest in what has been found and what remains to be discovered. The society will be holding a free Heritage Weekend this October when the finds, scanning, detecting and drone equipment will be on hand for all to see and handle. Stroud Museum has also agreed to attend to promote a wider interest in our district's history.

4. It is then very sad that the organisation that has facilitated part of this project and professes to wish to 'learn from the land' has put profit before its core belief of cherishing the preservation of the countryside. This housing estate has nothing 'garden' about it. It even failed the government's definition of a garden community and turning green fields into asphalt and concrete couldn't be farther away from anyone's idea of a garden. It is simply a housing estate.

5. ECT's reputation has plummeted here as it has grasped the opportunity to cash in on its holding of rare, best and most versatile land and sought to destroy a wonderful educational opportunity which could belong to the people of this parish for years to come. Residents want to know what exactly ECT does stand for when it behaves in this fashion. Selling the family silver is an apt definition.

#### Implications of approving PS37 Wisloe

6. The co-sponsors for development at PS37 Wisloe Green, Gloucestershire County Council (GCC) and ECT, commissioned a heritage assessment by Cotswold Archaeology<sup>1</sup> in May 2019 which was published in September 2019.

7. The assessment mentioned in paragraph 3.10:

*'systematic field walking recorded an assemblage of Romano-British pottery sherds and building material fragments; coins are also reported from chance finds and non-systematic metal detecting'*

8. This quote refers mainly to a brief field walk conducted by members of Slimbridge Local History Society<sup>2</sup> (SLHS) on the 13 October 2001 and published in the Glevensis, the official publication of the Gloucestershire Archaeology Society in 2003. The Cotswold Archaeology assessment did not give a reference, but it is provided below. When taken in context of later findings, after the Cotswold Archaeology assessment was completed, the artefacts were more important than the assessment suggests.

---

<sup>1</sup> Land at Wisloe Green, Slimbridge/Cambridge, Gloucestershire, Heritage Assessment September 2019

<sup>2</sup> Fieldwalking at Slimbridge in 2001 - Glevensis 36 2003

9. They clearly showed the presence of high-status occupation including pottery, roof tiles and hypocaust from Roman heating systems. Therefore, even at this stage, it can be safely assumed that at least one and maybe more Roman buildings will be found on PS37. This is hardly surprising given the proximity to the Roman road and even more so when more recent discoveries are taken into account. Photographs of the artefacts are at Appendix 1.

10. The Cotswold Archaeology assessment concluded that:

*6.2. The Site has high potential for Romano-British settlement remains and possible remains of the Gloucester to Sea Mills Roman road. The Site has potential for medieval settlement remains, and more limited potential for Saxon settlement remains. The Site has some limited potential for Prehistoric remains, particularly later prehistoric deposits associated with the known settlement to the south of the Site.*

***6.3. The proposed residential redevelopment of the Site would likely result in the truncation and/or total removal of the anticipated archaeological resource within the Site. None of these remains are anticipated to be of such significance that they would preclude such redevelopment. However, a programme of archaeological evaluation works would be recommended in order to establish the nature and extent of the potential archaeological deposits, and establish their significance, in order to design a programme of archaeological works which could mitigate for the harm of their removal (through residential redevelopment of the Site, through preservation by record. It may also be possible, through heritage led design measures, to preserve some of the identified archaeological resource in-situ. My emphasis.***

11. In January 2020 ██████████ GCC Heritage Team Leader, reassured the Wisloe Action Group in an email<sup>3</sup> that he was well aware of the ‘*potential for significant archaeology and we will be recommending a full range of archaeological evaluation before any planning permission is in place*’. In other words, not before GCC has had Wisloe approved.

12. There is a paragraph in the National Planning Policy Framework 2019<sup>4</sup> which merits furthermore examination:

**187. Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:**

**a) assess the significance of heritage assets and the contribution they make to their environment; and**

**b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.**

13. Clearly then, GCC were well aware of the significance of the site but were not prepared to investigate further until after PS37 had been approved. As GCC were one of the co-sponsors it

---

<sup>3</sup> Slimbridge Development 7 January 2020 at 08:49

<sup>4</sup> NPPF February 2019

was clearly reluctant to investigate, and possibly confirm, just how significant the site might be. This directly contradicts the requirement in NPPF paragraph 187 above.

14. In the Wisloe Action Group's (WAG) consultation response to Stroud District Council's (SDC) Draft Local Plan Consultation<sup>5</sup> in January 2020 details of recent discoveries made after the Cotswold Archaeology assessment, were provided. They were as follows:

*In the summer of 2017 permission was given for a detectorist rally on land behind Lancelot Close just north and west of the church. To everyone's surprise literally hundreds of Roman coins, brooches and artefacts were found. The detectorists were given permission to conduct three more rallies at other sites in the parish before it was realised that they were simply looting most of what was being found. The location of the finds was not being recorded and the vast majority were never seen again.*

*The rallies were stopped and, with the kind permission of the tenant and the landowner, Berkeley Estate, the Slimbridge Local History Society (SLHS) began coordinating a project to geophysically scan and systematically metal detect three fields in the parish. It soon became apparent that not only was there a significant Roman presence in the parish but also an Iron/Bronze Age settlement on the Lighten Brook. Hundreds of Roman coins and artefacts from around the second to third century AD have been recovered along with a whole range of items associated with Roman settlement and also a small number of Iron/Bronze Age coins. A Romano British double-ditch enclosure was found in Lynch Field close to Rectory Farm along with signs of an Iron/Age roundhouse next to Lighten Brook on Lightenbrook Lane.*

All the finds were carefully mapped and shared with [REDACTED] the Gloucestershire and Avon Finds Liaison Officer based at Bristol City Museum

*& Art Gallery. Geophysical scanning was conducted by [REDACTED] of Archeoscan<sup>6</sup>. Members of SLHS provided field support to the scanning and an educational programme was started by the society with local schools and information shared with the local community. [REDACTED] report is available from the Gloucestershire County Council (GCC) Heritage Team.*

#### **Possible unexploded WWII munitions**

*One elderly resident recalls a German bomber dumping its bombs just off Dursley Road. He was in one of the six houses nearest the M5 and was sheltering under a table in one of the houses when the bombs were dropped, blowing out the windows of the houses. He recalls playing in the bomb craters but, given the overgrown nature of the soft ground at the time, he can't be sure that all the bombs exploded. He would be willing to pinpoint the location if asked.*

#### **Significance of the discoveries**

*The significance of the two discoveries, Lanes End Bungalow Field (part of PS37) and Lynch field, is that they are linked by Lightenbrook. Firstly, the brook would have been crossed*

<sup>5</sup> Wisloe Action Group's (WAG) consultation response to Stroud District Council's Draft Local Plan Consultation - hand delivered 21 January 2020

<sup>6</sup> Geophysical Survey at Slimbridge, Gloucestershire - A gradiometer survey of fields surrounding the village of Slimbridge, Gloucestershire 2019. AJ Roberts BSc (Hons), MA, ACHA

by the Roman Road. Secondly, the gravel bed would have provided high quality drinking water for travellers and those living in Lynch field and, lastly, the brook would have given access to the River Severn. **This almost certainly shows settlement occupation stretching between at least Lanes End Bungalow field on the Roman road and a settlement on what would have then been the banks of the River Severn and may well extend over all the land earmarked for development. The view that there is a larger archaeological landscape is enforced by aerial photographs showing distinct and as yet unexplored cropmarks in fields behind Tynning Crescent which would link the two sites. This is a far larger and more significant settlement than was previously recognised.** My emphasis

**It also seems quite possible that this was also the site of a road junction leading not only to the Roman town of Corinium, present day Cirencester, but also the River Severn. Slimbridge would have been pretty much equidistant to all three major Roman towns, Bristol, Gloucester and Cirencester, and therefore a logical place for the interchange of materials and people. You could view this settlement area as a military and civilian settlement at a crossroads which formed a vital, major location for trade, manufacturing and the import of goods from across the Roman Empire. If this so, this would be an unprecedented discovery in the Severn Vale.** My emphasis

15. Further geophysical scanning in what is called Stanborough Mead, next to the Lighenbrook west of Slimbridge village, has revealed a very large building of Roman origin. Test pits were dug in October 2020 and two items were sent to Glasgow

University for radiocarbon dating. A bone knife handle dates from the turn of the second century and burnt remains from around 240AD. Stanborough Mead is approximately two kilometres from PS37 and similarly on the banks of Lighenbrook.

16. A full post-excavation report and archaeological evaluation was published in November 2020.<sup>7</sup> Once again, after the Cotswold Archaeology assessment report was completed. It is worth quoting some paragraphs from the report:

*11.1 The discovery of the significant Roman remains in this location potentially has a huge significance in the story of the Roman development in Gloucestershire. Given the large amount of coinage, and other metal artefacts, recovered from the Lynch Field it can be speculated that this area around Slimbridge may have been the location of a port or trading area located on the banks of the Severn. If the large structure that has been identified in Stanborough Mead dates to the 1st and 2nd centuries AD, it could indicate that this potential port has a strategic significance in this early period. There is no doubt that the structure was significant in size. It has a footprint over 3200m<sup>2</sup>. If it was a domestic building that is large comparison with other structures in Gloucestershire. If it is not domestic, but a storage/military facility, it may indicate military control of trade at this location and again point to the significance the Slimbridge locality. Either type of structure, in this location, is both unusual and significant, even more so if it were to prove to be a military facility dating to the 1st century AD.*

*11.2 A port facility at Slimbridge in the 1st Century AD may make sense given the political and geographical landscape of the period. The Colonia at Gloucester (Glevum) was*

---

<sup>7</sup> Stanborough Mead Archaeological Evaluation 2020, November 2020, A J Roberts BSc (Hons) MA ACIfA

established in 97 AD and until that point the dominant facility in Gloucester was the Kingsholm fortress. A port/trading area at Slimbridge would allow supplies to flow to the Gloucester area by road and inland towards Cirencester without having to sail the additional distance around the Noose in the Severn. Equally the Severn could be easily crossed here to allow goods and supplies to flow into/out of South Wales in a much timelier fashion than travelling up to Gloucester and back.

11.3 The landscape setting of the large buildings in Stanborough Mead is also significant. It can be seen from the LIDAR images at Annex F that the complex is located on effectively a spur of higher ground projecting into the lower ground of the Severn Estuary. Different Severn levels could have meant that this location was highly visible for traffic sailing up the Severn and heading for the port facility at Slimbridge. It could also be significant that the 'inlet' formed by the higher ground to the North of the location of the buildings leads to the Lynch Field where the thousands of coins and metal artefacts have been recovered. Is it possible that this stone complex could have been a 'controlling' or dominant building in the functioning of a trading centre at Slimbridge?

11.4 Notwithstanding the Roman presence in Stanborough and Lynch field it must not be overlooked that there is a significant Iron Age presence. The geophysics has identified several areas of extensive Iron Age occupation underlying the Roman settlement that is starting to be identified. A significant question must be whether the area was a major trading/port area in the Late Iron Age, a function that was continued after the Roman conquest.

**11.5 Whatever the speculation there is no doubt that, given the presence of significant prehistoric settlement, large, potentially early, Roman stone buildings and thousands of coins and brooches have been identified in the landscape around Slimbridge. This area around Slimbridge has a significant strategic importance in the local landscape. Should further work indicate that the buildings in Stanborough Mead date to the 1st Century AD this would be a significant addition to the understanding of the Roman presence in Gloucestershire, particularly on the Severn foreshore.** My emphasis.

12.1 The initial findings of the evaluation are both exciting and promising. The presence of large Roman structures in this part of the Slimbridge landscape potentially is incredibly significant in understanding the development of the Slimbridge area and potentially the development of the Late Iron Age/Roman Landscape in this part of Gloucestershire.

**12.2 It would greatly assist the understanding of the landscape setting of the Roman buildings to continue to expand the geophysical survey in the surrounding areas. These large buildings probably did not stand in isolation but had a relationship with a larger community in the vicinity. The evidence collated to date suggest that the wider landscape around Slimbridge is more populated in the early Roman period that previously understood and could have a much greater strategic significance than currently believed.** My emphasis.

17. In addition to the above, a Roman villa was discovered on the neighbouring Bovis Homes housing development at Box Road Cam in early 2020. This discovery forced a major redesign of

the development in order to preserve the villa. [REDACTED] Cotswold regional director at Bovis Homes stated:

*“Bovis Homes is very proud to preserve a valuable part of Cam’s history and an information board, at the location of the remains, has been placed for the community. We’d also like to thank TVAS for their commitment and support throughout the findings and preservation process.*

*“We’ve been working closely with the local community and local councillors, to work through a coordinated approach to maintaining the villa and we’re delighted to preserve these historical artefacts.*

***“We redesigned our development after discovering the remains, so that no homes are built on top and have done all we can, with TVAS, to ensure these findings last forever.”*** My emphasis.

18. This statement is available on the Bovis Homes website.<sup>8</sup> It could be argued that the discovery was unexpected however, the same could not be said for Wisloe.

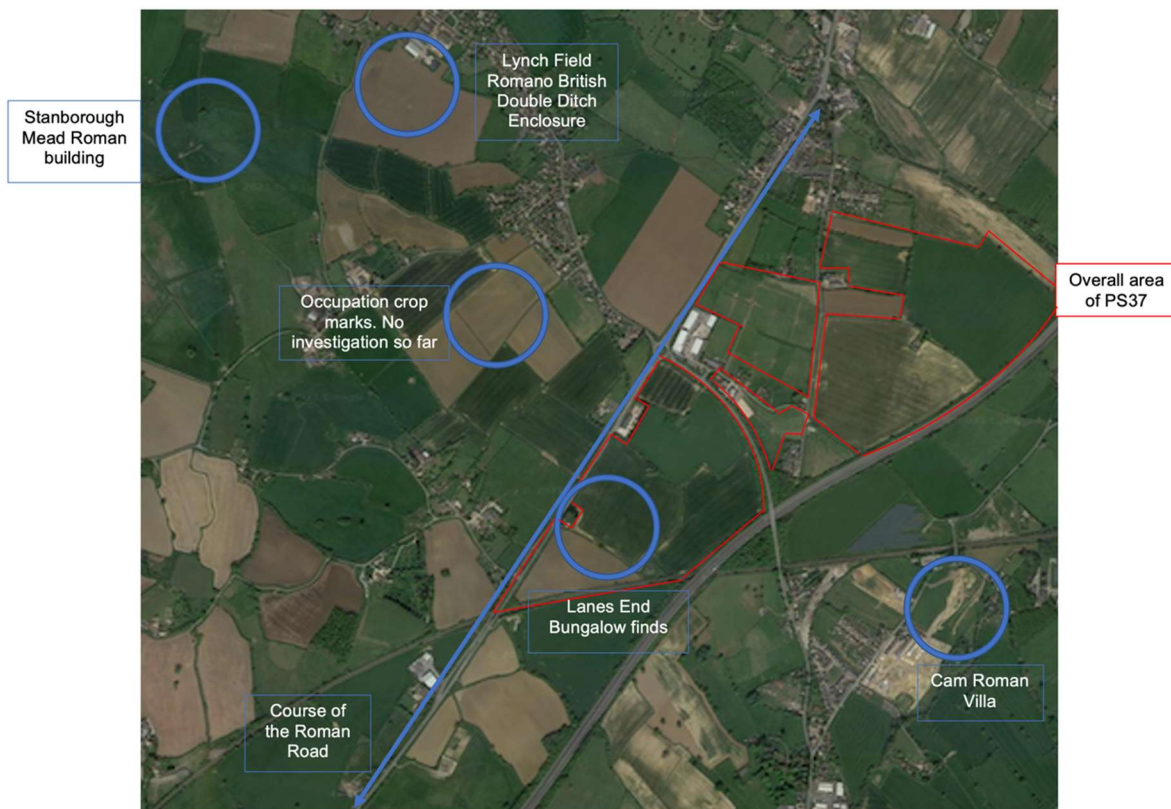
19. There was, therefore, ample proof from a variety of expert sources of the likelihood of a substantial Roman settlement stretching from what would have been the banks of the River Severn, across the Roman Road over PS37 and reaching into Cam.

20. By early 2020 a clear picture was emerging. The initial Cotswold Archaeology assessment was correct as far as it went, although it played down the findings from the field walk and did not provide the full details of the findings. The subsequent later discoveries on both sides of PS37 revealed the likely presence of an extensive early Roman settlement contemporary to the establishment of Gloucester as a military outpost. This is a simplified map showing significant finds mentioned earlier but leaving out the multiple, more detailed reports, to be found on the

---

<sup>8</sup> <https://www.bovishomes.co.uk/news/revised-plans-see-new-part-of-cam-community-taking-shape-around-roman-villa-remains-/>

Historic Environment Record held by GCC.



21. Despite the requirements of the NPPF, SDC has chosen not to take heed of the WAG response to the initial consultation, the discovery at Stanborough Mead and the discovery of the Roman villa off Box Road. GCC has deferred further investigation until the planning application stage. Therefore, through inaction, SDC and the proposers have simply crossed their respective fingers and hoped for the best. The lack of a development strategy, save a few colourful maps and leaflets, demonstrates an unprofessional approach unlike what would have been expected had there been a developer.

22. Given the deferral of any archaeological investigation by the proposers, the true historical value of PS37 remains unknown. There is a strong possibility that the opportunity to further investigate the parish's history in a timely manner will be compromised. Importantly, significant discoveries could fatally undermine the delivery requirements for PS37 in terms of time and the required number of houses leaving the overall Local Plan seriously compromised.

23. This is in sharp contrast to the developer led proposal at PGP1, Whitminster, where the developer has invested a considerable sum in having the site geophysically scanned and test trenches dug. This professional approach has ensured that the development will not be compromised and building work can be commenced quickly if the site were included in the Local Plan.

24. We will pass over the lack of follow up on the possibility of there being unexploded munitions on the site as this is not a heritage consideration but is a serious public health risk should the development proceed. The proximity of any unexploded munitions to the high-pressure gas



pipeline remains unknown as GCC has declined to conduct geophysical scanning until the planning stage.

**25. Slimbridge Local History Society believes the inclusion of PS37, Wisloe Green, in the proposed Local Plan is both unsound and not legally compliant for the following reasons:**

**25.1. SDC failed to take any action to investigate additional information provided, from a number of sources, which would have cast the proposers' heritage sustainability assessment and the selection of PS37 in doubt.**

**25.2. GCC Heritage Team has declined to geophysically scan the site until the planning application stage. This is in stark contrast to the alternative site at PGP1, Whitminster, where developers consider this an essential step in understanding the viability of the site to meet housing targets and avoid last minute surprises.**

**25.3. The proposers (there is no developer) cannot produce a masterplan without understanding the impact of the discovery of heritage assets would have on the layout of the site. It should be noted this is only one of a number of unknown factors SDC and the proposers have chosen to defer until later.**

**25.4. The actions of SDC with regard to heritage preservation is in direct contradiction of the NPPF 2019 requirements. This aspect of the plan is not legally compliant.**

Chairman, Slimbridge Local History Society

July 2021

Appendix 1. Artefacts recovered on the 2001 field walk







6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove PS37 from the Local Plan

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As the evidence presented above demonstrates, the heritage assessment made by the proposers in 2019 is already out of date. A further, month long, dig at Stanborough Mead begins next month (August 2021). It is anticipated that the results from this dig will further emphasise the size and importance of the Roman settlement at Slimbridge.

Attending the hearing session will provide the opportunity for the inspector to be brought up to date on discoveries and emphasise the importance of removing PS37 from the Local Plan while exploration continues.

Approving the inclusion of PS37 in the plan with incomplete heritage information would deprive the local community of an irreplaceable opportunity to understand their heritage and cast the viability of the site in serious doubt.

---



**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

