

Written Scheme Of Investigation

Land at the Depot, Alexandra Road, Coalpit Heath, South Gloucestershire

Watching Brief
P23/00067/F

February 2024

Avon Archaeology LTD



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Document Title	Land at the Depot, Alexandra Road, Coalpit Heath
Client Name	White Horse Homes
Site Location	Alexandra Road, Coalpit Heath BS36 2NJ
National Grid Reference	ST 67735 81395
Planning Authority	South Gloucestershire Council
Planning Reference	P23/00067/F
Museum Name	Bristol Museum and Art Gallery
Project Code	AAL 23-24.631
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1 Introduction

1.1 Avon Archaeology Limited have been commissioned by White Horse Homes, to undertake a programme of archaeological monitoring (watching brief) on a parcel of land off Alexandra Road, Coalpit Heath, in South Gloucestershire during groundworks associated with the construction of five new dwellings.

1.2 The development is subject to the following notice issued by South Gloucestershire Council reference P23/00067/F which includes the following condition:

Condition 6

Prior to the commencement of the relevant part of the development details/samples of the roofing and external facing materials proposed to be used shall be submitted to OFFTEM and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details. Reason To ensure a satisfactory standard of external appearance and to accord with Policy CS1 of the South Gloucestershire Local Plan: Core Strategy (Adopted) December 2013; and the National Planning Policy Framework.

1.3 This Written Scheme of Investigation has been produced to set out the aims, objectives and methodology that will be employed by Avon Archaeology Ltd to carry out a requested archaeological evaluation of the site.

1.3 The work will be conducted in accordance with the relevant guidelines for archaeological fieldwork projects issued by the Chartered Institute for Archaeologists. Specifically, the overarching controlling document in this respect is the *Universal guidance for archaeological monitoring and recording*, issued by the ClfA in December 2023. The project will also follow both the guidelines for archaeological projects set out in MoRPHE (Management of Research Projects in the Historic Environment, 2015),



and will be underpinned by the guidelines set out at national level in the NPPF (National Planning Policy Framework, as most recently revised July 2021).

- 1.5 Health and Safety will take priority over all archaeological matters, and fieldwork will be undertaken in accordance with the Health and Safety Policy of Avon Archaeology Limited (produced in collaboration with AAL's health and safety advisors Acorn Health and Safety). The ClfA does not itself produce Health and Safety standards and guidance explicitly for the archaeological sector, although some general guidance is provided by FAME (the Federation of Archaeological Managers and Employers). A project specific Health & Safety risk assessment will be produced by Avon Archaeology Limited prior to the commencement of fieldwork.
- 1.6 The local authority archaeological officer for South Gloucestershire Council will be informed of our appointment and will be notified of the project commencement date before work begins on site.

2 National and Local Planning Policy

National Planning Policy.

- 2.1 The current national legislative and planning policy system identifies, through the National Planning Policy Framework (NPPF), last substantively updated in December 2023. It states that applicants should consider the potential impact of development upon 'heritage assets'. This term includes: designated heritage assets which possess a statutory designation (for example listed buildings and conservation areas); and non-designated heritage assets, typically compiled by Local Planning Authorities (LPAs) and incorporated into a Local List or recorded on the Historic Environment Record.
- 2.2 Where any development may affect certain designated heritage assets, there is a legislative framework to ensure proposed works are developed and considered with due regard to their impact on the historic environment. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990. The

relevant legislation in this case extends from section 66 of the 1990 Act which states that special regard must be given by the decision maker, in the exercise of planning functions, to the desirability of preserving or enhancing listed buildings and their setting. The meaning and effect of these duties have been considered by the courts in recent cases.

- 2.3 The detail of such cases need not concern us here but the essential outcome of various litigations was that a succession of courts agreed that Parliament's intention in enacting section 66(1) was that decision makers should give *'considerable importance and weight'* to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings. Section 69(1) of the Act requires LPAs to 'determine areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance' and to designate them as conservation areas. Section 69(2) requires LPAs to review and, where necessary, amend those areas 'from time to time'. For development within a conservation area section 72 of the Act requires the decision maker to pay

'special attention [...] to the desirability of preserving or enhancing the character or appearance of that area'.

- 2.4 The duty to give special attention is considered commensurate with that under section 66(1) to give special regard, meaning that the decision maker must give considerable importance and weight to any such harm in the planning balance. However, as the site is not located within a Conservation Area, section 72 is not relevant for present purposes.
- 2.5 The NPPF defines a heritage asset as a: 'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest'. This includes both designated and non-designated heritage assets. Section 16: *Conserving and Enhancing the Historic*

Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are

'an irreplaceable resource, and should be conserved in a manner appropriate to their significance'.

- 2.6 For proposals that have the potential to affect the significance of a heritage asset, paragraph 200 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their setting. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 201, which requires LPAs to take this assessment into account when considering applications.
- 2.7 Under *'Considering potential impacts'* the NPPF emphasises that *'great weight'* should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets. Paragraph 207 states that where a development will result in substantial harm to, or total loss of, the significance of a designated heritage asset, permission should be refused, unless this harm is necessary to achieve substantial public benefits, or a number of criteria are met. Where less than substantial harm is identified paragraph 207 requires this harm to be weighed against the public benefits of the proposed development. Paragraph 209 states that where an application will affect the significance of a non-designated heritage asset, a balanced judgement is required, having regard to the scale of harm or loss and the significance of the heritage asset.
- 2.8 Paragraph 212 of the NPPF notes that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. It also states that 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.



- 2.9 The *Planning Practice Guidance* (PPG) has been adopted in order to aid the application of the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle. Key elements of the guidance relate to assessing harm. It states that substantial harm is a high bar that may not arise in many cases and that while the level of harm will be at the discretion of the decision maker, generally substantial harm is a high test that will only arise where a development seriously affects a key element of an asset's special interest. It is the degree of harm, rather than the scale of development, that is to be assessed.
- 2.10 Conservation Principles outlines Historic England's approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in Historic England's own advice and guidance, the document is recommended to LPAs to ensure that all decisions about change affecting the historic environment are informed and sustainable. The guidance describes a range of heritage values which enables the significance of assets to be established systematically, with the four main heritage values being: evidential value; historical value; aesthetic value; and communal value.
- 2.11 The PPS5 Practice Guide was withdrawn in March 2015 and replaced with three Good Practice Advice in Planning Notes (GPAs) published by Historic England. *GPA1: The Historic Environment in Local Plans* provides guidance to local planning authorities to help them make well informed and effective local plans. *GPA2: Managing Significance in Decision-Making* includes technical advice on the repair and restoration of historic buildings and alterations to heritage assets to guide local planning authorities, owners, practitioners and other interested parties. *GPA 3: The Setting of Heritage Assets* replaces guidance published in 2011. These are complemented by the Historic England Advice Notes in Planning which include *HEA1: Understanding Place: Conservation Area Designation, Appraisal and Management* (February 2016), *HEA2: Making Changes to Heritage Assets* (February 2016), *HEA3: The Historic*

Environment and Site Allocations in Local Plans (October 2015), and HEA4: Tall Buildings (December 2015).

Local Planning Policies.

- 2.12 Specifically for South Gloucestershire, planning policy is provided by For South Gloucestershire specifically, the relevant sections of the Local Plan: Core Strategy (adopted 2013) states that:

2.5 Relics of historic settlements and the industrial past (coal mining and manufacturing) texture the landscape. A rich and varied heritage of historic buildings, settlements, parks and gardens and archaeological features make an important contribution to the character of the area. South Gloucestershire also has a rich natural environment and an array of ecological assets, from international designations in the Severn Estuary to species of critical importance for local biodiversity. The Severn Levels is also an area of high archaeological potential.

5.4 The policy sets out criteria for the assessment of high quality design in new development. In particular, through Design & Access Statements, development proposals should demonstrate a clear understanding of both the site and locality's historic, archaeological, ecological and landscape context in drawing up development proposals. The policy also sets out key design priorities and a standard against the established national assessment methodology, 'Building for Life' (BfL12), that residential development proposals will be expected to achieve.

8.8 South Gloucestershire has an important legacy of heritage and cultural assets, including over 2000 listed buildings, approximately 1500 locally listed buildings, 30 conservation areas, 8 registered historic parks and gardens, and 37 scheduled monuments. There are a wide range of undesignated historic buildings, archaeological sites and remains, and historic parks and gardens as well as places, areas and landscapes of historic interest. Information about heritage assets can



be found in the South Gloucestershire Historic Environment Register (HER). These assets make a significant contribution to the identity of the locality in which they are set, helping to create a sense of place. Applications for development which affect heritage assets and their settings directly or indirectly will need to describe the nature of the significance of the assets affected, and set out how development will maintain and enhance heritage assets and their settings in a manner appropriate to that significance. New development should seek opportunities to draw on the historic environment in order to maintain and enhance local character and distinctiveness.

- 2.13 South Gloucestershire does not have a Supplementary Planning Document relating explicitly to Archaeology, or indeed for any aspect of Heritage in general, as Bristol does. There is an SPD for Conservation Areas, but that does not apply in the present case. Neither is there a Supplementary Planning Guidance document for Archaeology or Heritage. There *are* three Technical Advice Notices (TANs) directly related to archaeology and heritage but these are *not* related to policy issues, instead providing guidance on how various pieces of work related to a development proposal, should be carried out (the three TANs are: Understanding Heritage Assets; Heritage Statements; and Written Scheme of Investigation for Archaeology). Neither does South Gloucestershire specifically identify, on its planning maps, what are termed by some other local authorities, 'Areas of High Archaeological Potential'.

3 Site Location, Geology and Topography

- 3.1 The project site occupies a roughly rectangular shaped parcel of land covering an area of approximately 1000m² at the north end and east side of Alexandra Road in Coalpit Heath (**Figures 1 & 2**). The site is currently roughly surfaced, and used for vehicle parking and storage.
- 3.2 The site is bounded to the north directly by two residential properties, Church Road passes in an east –west direction with farmland beyond. It is bounded east, south and

west by modern housing estates. The core settlement of Coalpit heath lies to the south of the site. Smaller settlements of Frampton Cotterel, Whatleys End and Winterbourne all now connected by development are located to the west. The small town of Yate is located approximately 2 miles east.

3.3 Geologically, the site is located close to the boundary of Farrington Member/Barren Red Member and Mangotsfield Member, both are types of mudstone both formed during the carboniferous period (BGS viewer).

3.5 There was no dedicated topographical survey available at the time of writing. The site is relatively flat with an average height of 60m aOD

4 Historical and Archaeological Background

4.1 Although now very much a modern settlement, historically Coalpit Heath lay in the ancient parish of Frampton Cottrell. The site itself, however, at the very eastern boundary of Frampton Cottrell parish, and indeed site's eastern boundary also marks the ancient parish boundary, with Westerleigh immediately to the east. The history of the general area, however, at least from the 17th century, has been defined and moulded by its position on the Bristol Coalfield. The entire area is littered with the remains of coal workings of all periods from that time up to the 20th century; these traces take a very wide variety of forms, and they represent the principle archaeological interest of both the site itself, and its immediate environs. Indeed the First Edition OS map marks an 'Old Coal Pit' immediately to the west of the site, on the western side of what is now Alexandra Road. The site itself remained completely undeveloped until well into the 20th century, but further coal workings, and a lime kiln, are noted by the South Glos. HER immediately to the north of the site, on the northern side of what is now Church Road (formerly Watermore Lane along its eastern stretch).

5 Aims and Objectives



5.1 The aims of the watching brief, as defined in the ClfA's *Universal Guidance* document (already cited) are:

- To allow for the preservation by record of archaeological deposits, the presence and nature of which could not be ascertained in advance of the development;
- To provide the opportunity, if required, for the watching archaeologist to signal to all interested parties, before the destruction of the material in question, that an archaeological find has been made for which the resources allocated to the watching brief are not sufficient to support treatment to a satisfactory and proper standard; and
- To inform a mitigation strategy allowing for a programme of recording appropriate to the significance of such deposits.

5.2 The objectives of the Watching Brief are:

- To determine the presence or absence of archaeological features, deposits, structures, artefacts or ecofacts within the Project Site;
- To establish and record the extent, character, date, condition and significance of any surviving archaeological remains, to an appropriate level and within the constraints of the Project Site;
- To place identified archaeological remains within the wider historical and archaeological context in order to establish their significance; and
- To prepare an archaeological report detailing the results of the watching brief.

6. Methodology

6.1 The archaeological monitoring is required to monitor **all** intrusive ground works that will be undertaken within the development area. Unless ground conditions make it completely unavoidable, the groundworks contractor *must* use a **toothless grading bucket** for all on site excavation and/or ground reduction work. The groundworks will



be monitored by a suitable qualified and experienced archaeologist. Access will be arranged for site visits in order to inspect progress on site as necessary.

- 6.2 Where archaeological features are identified, the supervising archaeologist will have the authority to suspend construction work temporarily for an appropriate time, to enable finds to be recovered and a suitable level of recording to be undertaken.

Recording

- 6.3 All archaeological deposits and features will be recorded using the Avon Archaeology Limited pro forma recording system. A complete drawn record of excavated archaeological features and deposits will be made, including plans and sections drawn to appropriate scales (usually 1:20 or 1:50 for plans and 1:10 for sections), and tied to the Ordnance Survey (OS) National Grid. The Ordnance Datum heights of all features will be calculated, and the levels added to the drawings.
- 6.4 A full photographic record will be made using digital cameras equipped with an image sensor of not less than 10 megapixels.

Survey

- 6.5 A survey of all archaeological features will be carried out using a survey-grade GPS unit. All survey data will be recorded in OS National Grid coordinates and heights above Ordnance Datum. In the event that it is not possible to use the survey equipment, archaeological features will be located using client plans or features that appear on OS mapping. This will be achieved using handheld measuring tapes and the basic principles of triangulation.

Contingency Measures

- 6.6 In the event that significant archaeological deposits are discovered, contact with the client and the local authority Archaeological Officer will be made to review any additional project requirements that are not outlined in this document.

- 6.7 A contingency fund has been earmarked for possible use to undertake additional work, including specialist studies and/or treatment of archaeological finds recovered during the course of post-excavation assessment and project reporting.

Finds

- 6.8 All artefacts and ecofacts will be recovered, identified by stratigraphic unit, catalogued and prepared for long term storage after analysis, if appropriate. Provision is made in the form of a contingency to undertake appropriate analysis and reporting of significant artefacts if such finds are located during the site work.
- 6.9 Artefacts from features of modern date (19th-century or later) may be recorded on site but not retained.
- 6.10 Where appropriate, soil samples may be taken and sieved to aid finds recovery. Any finds requiring conservation or specific storage conditions will be dealt with immediately in line with First Aid for Finds (Watkinson and Neal 1998).

Environmental Sampling

- 6.11 No specific environmental sampling strategy has been requested for this project, and it is not a usual inclusion for Watching Briefs. If deposits that are of geoarchaeological interest are encountered, AAL will seek the advice of Mike Allen of Allen Environmental Archaeology.
- 6.12 In general, features directly associated with particular activities (e.g. pits, latrines, cesspits, hearths, ovens, kilns, and corn driers) will be prioritised for sampling over features, such as ditches or postholes, which are likely to contain reworked and residual material. Bulk environmental soil samples taken for the recovery of plant macrofossils, wood charcoal, small animal bones and other small artefacts, will be taken as appropriate from well-sealed and dateable contexts or features.

- 6.13 Samples will be of an appropriate size – typically 40 litres for the recovery of environmental evidence from dry contexts, and 10 litres from waterlogged deposits. Following specialist advice, other sampling methods such as monolith, Kubiena or contiguous small bulk (column) samples may be employed to enable investigation of deposits with regard to microfossils (e.g. pollen, diatoms) and macrofossils (eg, molluscs, insects), soil micromorphological or soil chemical analyses.

Human Remains

- 6.14 Any human remains (articulated or disarticulated, cremated or unburnt) discovered will be left in situ, covered and protected. A Ministry of Justice licence will be obtained by Avon Archaeology Limited before further excavation, if necessary. The need for excavation, removal and or sampling will be determined following discussion with the client, the Local Authority Archaeologist etc where appropriate. If deemed appropriate, the human remains will be fully recorded, excavated and removed from the site in compliance with the terms of the Ministry of Justice licence.
- 6.15 Any excavation and post-excavation processing of human remains will be undertaken in line with current guidance documents, most notably Mitchell and Brickley 2017. Please note that appropriate specialist guidance will be provided by Dr Heidi Dawson-Hobbis (Winchester University), with site visits undertaken if required. The final deposition of human remains, following analysis, will be in accordance with the terms of the Ministry of Justice licence.

Treasure

- 6.16 Avon Archaeology Limited will immediately notify the client, and the Archaeological Officer for South Gloucestershire, on the discovery of any material covered, or potentially covered, by the Treasure Act 1996 (as amended by The Coroners and Justice Act 2009). All information required by the Treasure Act (i.e., finder, location, material, date, associated items etc.) will be reported to the Coroner within 14 days.



7 Personnel

- 7.1 The project will be managed by: Rachel Heaton BSc. Site staff are yet to be confirmed and will remain flexible.

The following key specialist studies will be earmarked to the project for post-excavation specialist reporting where necessary.

- Roman pottery and finds – Dr Jane Timby
- Medieval and post-medieval ceramics – freelance specialist Dr Alejandra Gutierrez
- Faunal remains – Joss Davis BA and/or Lorrain Higbee of Wessex Archaeology Limited
- Environmental Archaeology – Mike Allen, Allen Environmental Archaeology
- Small Finds – In house and/or Dr Jane Timby
- Osteology – Joss Davis BA and/or Dr Heidi Dawson-Hobbis
- Prehistoric lithics – Dr Kath Walker FSA, Visiting Fellow, University of Bournemouth
- AMS Dating – Dr Tim Knowles, Bristol University AMS Lab
- Archaeometallurgy – Dr Tim Young, GeoArch

8 Post-Excavation Reporting

- 8.1 Following the completion of the field work and assessment of data recovered, a draft report will be produced and forwarded to the client and to the Local Authority Archaeological Officer for review. The final report will be issued upon settlement of all outstanding invoices.

- 8.2 The report will contain the following as a minimum:

- A frontispiece detailing the site name, grid reference, report author(s), project dates, project title and reference number and planning application number;
- Historic Background;
- Where appropriate, Historic Map Regression and Landscape Analysis
- The dates of the programme of work;
- The aims and methodology;

- The results of the monitoring including post-excavation assessment;
- Future project mitigation;
- Selected images from the photographic record;
- Interpretation of the historic materials;
- Supporting illustrations;
- Archive preparation and deposition arrangements;
- References.

8.3 The final copy of the report will be submitted to the Historic Environment Record and deposited with the Archaeological Data Service, along with surveyed data in shapefile format. Digital geospatial data will be submitted to South Gloucestershire Council along with the project report. It is anticipated that this will be in a CAD format and will include all survey data.

Publication

8.4 If appropriate, a publication of findings will be made in a suitable medium at an appropriate detail, depending on the results of the recording exercise. At the least, a note will be submitted to a suitable local journal.

9 Preparation and deposition of the archive

9.1 The archive will be deposited with an appropriate local museum, in this case Bristol City Museum and Art Gallery, on completion of the site analysis and report production. The archive and the finds (if donated by the landowner) will be deposited for storage and public access at an appropriate local museum or other facility. Before commencement of the project on site, contact will be made with the landowners and with the appropriate local museum to make the relevant arrangements. Arrangements for deposition will be agreed in advance with the museum accession officer.



9.2 Copies of all archaeological reports arising out of the project shall be submitted to the local authority to be placed within the local Historic Environment Record (HER). Digital geospatial data will be submitted to the local HER along with the project report. It is anticipated that this will be in a CAD format and will include all survey data.

OASIS

9.3 An OASIS online record has been created with key fields completed, entry number avonarch2-522836. The record will be completed at the end of the project. Subject to any contractual requirements on confidentiality, copies of the OASIS record will be integrated into the relevant local and national records and published through the Archaeology Data Service ArchSearch catalogue.

10 Health and Safety

10.1 Health and Safety will take priority over all archaeological matters and fieldwork will be undertaken in accordance with the general principles on H&S as promulgated by the Federation of Archaeological Managers and Employers (FAME). Project specific Health and Safety Risk Assessment and Safe Working documents will be prepared in advance of attendance on site in accordance with Avon Archaeology Ltd Health and Safety Policy, which has been drafted in collaboration with Acorn Health and Safety Ltd. All members of staff are qualified and registered with the Construction Skills Certification Scheme.

11 GDPR Compliance

11.1 We may process the information that we collect from clients and third parties such as landowners, for the legitimate purposes of our business:

- Artefacts provenance (that is, to record the history of an object); and
- To keep a record of our professional services on projects.



- 11.2 This information may be collected from contract documents, including tender information; and during a project, from information requested by telephone, email or in person, in relation to artefacts. The information includes an individual's or company's name, address, email address and telephone number.
- 11.3 We do not sell any data that we process. Nor do we use it for marketing or for any purpose other than those stated above. To fulfil our professional obligations, we store data in our project archives. In the case of any artefacts collected, the local collecting museum is permitted to both store the artefacts and store, process and use the names and addresses of clients and landowners referenced in the archive. Data not passed to a museum is stored in our project archives which will be maintained for as long as Avon Archaeology Limited is in operation. Museums may hold data in connection with collections in perpetuity (i.e. forever). Such processing by a museum is strictly for the purpose of collections provenance. The personal data may be used by the museum to contact the client or third party regarding the archive.
- 11.4 When you enter into a contract with us, or when data is requested, you will be asked to confirm that you agree to the processing of your personal information. You may withdraw your consent at any time by contacting us using the details at the end of this policy. Where you wish to withdraw your consent for us to share your details with a third party museum please make this known to us and we will contact that third party on your behalf.

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Figure 1

Site Location Map

 The Site

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Not to scale

Figure 2

Detailed site location with red line boundary

