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## Towergate A, Planning Application

Written Scheme of Investigation for Archaeological  
Mitigation – Strip, Map and Sample excavation



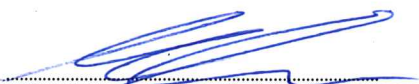
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## Document revisions

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# Executive summary

## Purpose of this report

This Written Scheme of Investigation (WSI) has been prepared by Wood Environment and Infrastructure Solutions UK Limited in response to a commission from their client, Homes England, to provide archaeological support with regards the need to provide archaeological mitigation on land at Towergate A, Milton Keynes (the site). The requirement for the WSI is outlined in a planning condition attached to planning permission 17/03205/OUT and in light of the results of a completed field evaluation. The WSI defines the requirement of the archaeological mitigation proposed (Strip, Map and Sample excavation) aimed at preserving by record the most significant archaeological remains present as determined by the field evaluation.

The Chartered Institute for Archaeologists defines an excavation as *'... a programme of controlled, intrusive fieldwork with defined research objectives which examines, records and interprets archaeological deposits, features and structures and, as appropriate, retrieves artefacts, ecofacts and other remains within a specified area or site on land, inter-tidal zone or underwater. The records made, and objects gathered during fieldwork are studied and the results of that study published in detail appropriate to the project design.'*

### Purpose of excavation

*'The purpose of excavation is to examine the archaeological resource within a given area or site within a framework of defined research objectives, to seek a better understanding of and compile a lasting record of that resource, to analyse and interpret the results, and disseminate them.'*

This WSI has been reviewed and agreed in discussion with the Milton Keynes Council's Senior Archaeological Officer on 16<sup>th</sup> July 2019<sup>1</sup>.

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<sup>1</sup> Email from Nick Crank (Milton Keynes Council's Senior Archaeological) 16<sup>th</sup> July 2019

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# 1. Introduction

This Written Scheme of Investigation (WSI) has been prepared by Wood Environment and Infrastructure Solutions UK Limited (Wood) in response to a commission from their client Homes England to provide archaeological support for an approved residential development at a site known as Towergate A, Milton Keynes.

## 1.1 Background

An outline planning application (with all matters reserved except access arrangements from Groveway) for residential development for up to 150 homes, public open space, sustainable urban drainage, and associated works was submitted to Milton Keynes Council (17/03205/OUT) in November 2017. The application was approved by the Council on September 6 2018.

Following consultation with the Council's Senior Archaeological Officer (Mr Nick Crank) during the consideration of the planning application and an initial phase of site evaluation, it was recommended by Mr Crank that **planning condition (no.6)** was attached to the outline planning permission:

*No development shall take place until an archaeological field evaluation comprising trial trenching has been completed. The archaeological evaluation shall be detailed in a Written Scheme of Investigation (WSI) submitted to and approved by the local planning authority in writing. On completion of the archaeological field evaluation a further WSI for a programme of archaeological mitigation in respect of any identified areas of significant buried archaeological remains shall be submitted to and approved by the local planning authority in writing.*

*For land that is included within the second WSI, no development shall take place other than in accordance with the agreed WSI, which shall include:*

- i) a statement of significance and research objectives;*
- ii) the programme and methodology of site investigation and recording, including those who are to undertake the agreed works; and*
- iii) the programme for post-investigation assessment and subsequent analysis, publication and dissemination and deposition of resulting material.*

Reason: To ensure the appropriate recording and/or conservation of any archaeological remains affected by the development in accordance with: Paragraph 141 of the National Planning Policy Framework; Policy CS19 of the Milton Keynes Core Strategy 2013; Saved Policy HE1 of the Milton Keynes Local Plan 2001-2011.

The completed programme of archaeological field evaluation comprised geophysical survey and trial trenching and identified buried remains of archaeological significance.

## 2. Legislation and policy context

### 2.1 Legislation

The importance of the historic environment is recognised in legislation as well as national and local policy. Certain features that are deemed to be of particular importance are given legal protection through legislation. The Ancient Monuments and Archaeological Areas Act 1979 provides for a schedule of monuments which are protected.

Similarly, the Planning (Listed Buildings and Conservation Areas) Act 1990 provides for the definition and protection of listed buildings and conservation areas. Section 66 of the Act places a duty on the determining authority to have special regard to the desirability of preserving a listed building and its setting in considering whether to grant permission for development which affects these. Section 72 involves a similar duty concerning conservation areas when considering development proposals within them.

### 2.2 National planning policy

Non-designated heritage assets as well as those designated under the above acts are given protection under the National Planning Policy Framework (NPPF 2019). Provision for the historic environment is given principally in Section 16 of the NPPF, which directs Local Planning Authorities to set out "a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance". This requirement is framed by a presumption in favour of sustainable development and the policy recognises that the historic environment has a role to play in urban design (section 7), promoting healthy communities (section 8) and protecting Green Belt land (section 9).

The principle of proportionally defining a site's potential is given in para 199.

*'Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible<sup>64</sup>. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.'*

### 2.3 Local planning policy

The new development strategy called Plan:MK was adopted in March 2019, and now forms part of the Council's Development Plan and replaces both the Core Strategy (2013) and saved policies of the Local Plan (2005).

#### **Policy HE1 - HERITAGE AND DEVELOPMENT**

A. Proposals will be supported where they sustain and, where possible, enhance the significance of heritage assets which are recognised as being of historic, archaeological, architectural, artistic, landscape or townscape significance. These heritage assets include:

1. Listed Buildings;
2. Conservation Areas;

3. Scheduled Ancient Monuments and non-designated Archaeological sites;
4. Registered Parks and Gardens;
5. Assets on the MK New-Town Heritage Register; and
6. Other places, spaces, structures and features which may not be formally designated but considered to meet the definition of 'heritage assets' as defined in Annex 2 of the NPPF.

B. Where appropriate, development proposals must provide an impartial and objective heritage assessment. Where necessary, the Council will require suitably qualified specialists to undertake the heritage assessment. The heritage assessment shall:

1. Assess and describe the significance of the heritage assets affected, identifying those elements that contribute to that significance and, where appropriate, those that do not. The level of detail shall be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of proposals on their significance. Limited and localised alterations to an unlisted building in a conservation area need not be supported by the level of detail required to convey the impact on significance caused by development in the setting of a listed building or by proposed alterations to the built fabric of a listed building.
2. Be of an analytical and interpretive nature rather than simply provide a description of the assets and the proposed works.
3. Provide a sound justification for the works, based on the economic, social and environmental benefits delivered by the scheme, for example, promoting the long term care for a heritage asset and/or its setting.
4. Explain how the scheme has taken account of the significance of the assets in its scope, design and detail, in order to minimise or avoid harm to the heritage assets affected.
5. Assess the nature and extent of any harm or public benefit arising from the scheme.
6. Where harm is caused by the proposal, the assessment shall explain why such harm is unavoidable or required to deliver public benefits that outweigh the harm caused.

C. Where applications seek to change the use of a listed building, evidence should be submitted to demonstrate that the proposal includes the full scope of works required to achieve that use (such as those that will be required by Building Regulations, The Fire Authority, Environmental Health etc.). Where a change of use requires a significant alteration or structural works, an engineer's report shall be submitted to demonstrate that the building is capable of conversion, set out the full extent of works and show how they have taken account of 2 a) above.

D. Granting of permission for proposals that result in substantial harm to or total loss of the significance of a designated heritage asset will only be exceptional or wholly exceptional in accordance with national policy and guidance.

E. Permission for proposals that cause less than substantial harm to a designated heritage asset will only be granted where the harm is demonstrably outweighed by public benefits delivered by the scheme.

F. Proposals that result in harm to the significance of non-designated heritage assets will be resisted unless the need for, and benefits of the development clearly outweigh the harm, taking into account the asset's significance and importance, and only once all feasible solutions to avoid and mitigate that harm have been fully implemented.

G. In assessing any potential harm or enhancement to the significance of a heritage asset(s) the following will be considered:

1. Avoiding successive small scale changes that lead to a cumulative loss or harm to the significance of the asset or historic environment;
2. Respecting the character, appearance, special interest and setting of the asset and historic environment;
3. Retaining architectural or historic features which are important to the character and appearance of the asset (including internal features) in an unaltered state; and
4. Retaining the historic form and structural integrity of the asset.

H. Where 'enabling development' is proposed, the Council will expect the proposal to accord with Historic England's published guidance. The applicant will provide accurate evidence to establish that a 'heritage deficit' exists. It is not the role of 'enabling development' to reimburse owners or applicants who have paid above the market value of asset, that value being based on the current condition of the asset.

I. Proposals will be accompanied by an appropriate desk-based assessment and field evaluation where development is proposed affecting an unscheduled site of known archaeological interest or with the potential to include heritage assets with archaeological interest (General requirement for applications affecting heritage assets).

J. The ability to record evidence of our past should not be a factor in deciding whether the loss of significance should be permitted. Where harm to or loss of heritage assets occurs as a consequence of development it will be necessary for developers to record and advance understanding of the significance of the affected assets in a manner proportionate to their importance and the impact (NPPF paragraph 141). Recording techniques should keep in step with current best practice and in particular the use of photogrammetry and fine grain LiDAR ground scans where unavoidable loss will occur. In the case of heritage assets of greater than local importance the results of this recording work should be published in the relevant local or period journal or in book form according to the scale and significance of the assets affected. Where significant archaeological remains are found, provision shall be made for public open days, exhibitions and/or popular publications/booklets. Where archaeological remains are preserved within public open space appropriate on-site interpretation and a strategy for long term care (and funding thereof) shall be produced as part of a holistic approach to the long term stewardship of the open space in question and agreed with the body responsible for the same. Where recording or assessment results in a physical archive for deposition at an appropriate museum or archive facilities, consideration of resources for its storage, interpretation and public access should be made in order to capture the heritage significance of that asset for future generations.

## 3. Scheme location and description

### 3.1 Location

The site is located at NGR 49054 23748 on the eastern side of Milton Keynes, between Groveway on the northern boundary and the village of Wavedon to the south.

The site is surrounded by existing and proposed development. To the north the Groveway link road forms the northern boundary, with extensive industrial and commercial units beyond; to the west a residential estate called Wavedon Gate is separated from the site by Ortensia Drive. Approved residential developments 15/2337/OUT and 15/2568 will form the southern and eastern boundaries.

### 3.2 Site description

Towergate A is a relatively small development site covering an area of 5.97ha. The land use is currently improved pasture and the underlying soils are lime-rich loamy and clayey soils with impeded drainage. It is bounded on the north, west and southern sides by broad tree belts, and by a mature hedgerow to the east. Topographically the land slopes gently from the south west corner at a height of 80m OD down to the north at a height of 70m OD, where the land drains into an unnamed tributary of the River Ouzel, 1.2 km to the north.

### 3.3 Site proposals

The outline planning permission is for up to 150 homes, public open space, sustainable urban drainage, and associated works. The illustrative masterplan provides an indication of potential site layout and is included as **Appendix A**.

## 4. Historic environment background

### 4.1 Previous surveys

An archaeological assessment of the site was undertaken in 2017. This included a desk-based assessment (AFW2017), and geophysical survey (WYASAS 2017). The geophysical survey covered an area of 5 ha of the site and identified anomalies consistent with archaeological features in the southern portion of the site.

This was followed in January 2019 by an archaeological field evaluation, undertaken by Cotswold Archaeology (Cotswold Archaeology, 2019). The evaluation comprised 15 trial trenches, measuring between 15m and 50m in length, by c.2m wide.

### 4.2 Archaeological potential

The trial trenching results were summarised in the report as follows;

*'A series of enclosures, ditches and pits of Late Iron Age to Roman date were located toward the southern part of the site, broadly corresponding with the results of preceding geophysical survey. Additional archaeological features not identified by the geophysical survey were recorded within the vicinity of the enclosures. A possible trackway/droeway aligned north to south extending across the central part of the site, remains undated. However, the ditch turns to the west to run on an east to west alignment in close proximity to the enclosure ditches and respects their alignment suggesting that it is of a similar date to the enclosures.*

*Further archaeological remains were identified in the northern part of the site comprising a series of gullies. However, these were undated and there was no evidence for any association with the Late Iron Age/Roman dated features recorded at the south of the site.*

*The pottery recovered was generally domestic in nature was largely of Late Iron Age to Roman date and mostly of 2nd century AD and later date. One sherd of probable Middle Iron Age/Late Iron Age pottery was collected but this was recovered along with an assemblage of Roman pottery, accordingly it is considered likely to be residual. The environmental evidence suggests that the features recorded represent outlying activity, beyond the core settlement area.*

*Overall, the site is generally characterised by agricultural activity of possible Late Iron Age/Roman date, concentrated within the southern part of the site. There is evidence for associated occupation of a rural nature. It is considered likely that the remains recorded within the site represent outlying occupation and it is possible that the core settlement area lay further to the south and south-east of the site.'* Cotswold Archaeology (2019).

These remains are not considered to be of national significance and consequently are not suitable for designation, and preservation in situ. While the option of preserving the archaeology in situ remains, if the client wishes, it is not a formal requirement, and preservation by record has been proposed as suitable mitigation. Following the strip, map and sample excavation, no further archaeological fieldwork will be required with regards to this site.

## 5. Archaeological Mitigation

This WSI sets out the agreed method of archaeological mitigation that will satisfy the planning condition and enable its complete discharge. It covers the details of the area and method of excavation, the research objectives, monitoring, reporting and archiving. It was agreed in discussion with the Milton Keynes Council's Senior Archaeological Officer on 16<sup>th</sup> July 2019<sup>1</sup>, and is submitted for approval to the LPA.

In this instance, a programme of controlled strip, map and sample excavation is considered to be a proportionate and appropriate mitigation. This method is suitable because the remains identified: -

- are of local / regional significance;
- do not appear to be the focus of settlement or high level of activity; and
- do not have specific potential to address major research questions.

The strip, map and sample excavation is referred to as the 'excavation' from this point forward in this document.

### 5.1 Project aims

The purpose of excavation is to provide sufficient record of the archaeological remains present that are likely to be lost as a result of development and to successfully fulfil and the planning condition.

All work shall comply with CIfA standards (Chartered Institute for Archaeologists, 2014), MAP2 or MORPHE, local authority requirements and current health and safety regulations.

### 5.2 Project roles

- The developer or their nominated agent will appoint a suitably qualified archaeological organisation (archaeological contractor) to undertake the fieldwork and produce the final report. Selection should ideally include CIfA registered companies who have worked in the region and are familiar with local archaeological issues;
- It is recommended that the work will be carried out under the overall archaeological supervision of an Archaeological Clerk of Works (ACoW) who will be responsible for liaising with the archaeological contractor, developer and local authority;
- Any change in scope of this written scheme of investigation will be agreed with the client, and the Milton Keynes Council's Senior Archaeological Officer; and
- All persons involved in archaeological work on the site will adhere to the Codes of Conduct of the Chartered Institute for Archaeologists (CIfA) and all relevant health and safety requirements.

### 5.3 Project timetable

The archaeological contractor shall provide a detailed project timetable that shall be approved by the ACoW and the Milton Keynes Council's Senior Archaeological Officer prior to commencement of works.

## 5.4 Project staff

The archaeological contractor, whom must demonstrate suitable levels of expertise, such as being a CIfA Registered Organisation, and shall provide a detailed method statement providing evidence of how the requirements of this WSI will be addressed, along with CVs including levels of individual CIfA membership of all staff who are to work on the project, to the Milton Keynes Council's Senior Archaeological Officer. All staff must be suitably qualified and have sufficient demonstrable experience.

## 5.5 Pre-commencement requirements

Prior to commencement of trial trenching, the archaeological contractor will:

- Seek information on existing services, contaminated ground and protected species restrictions for the site;
- Obtain from the Milton Keynes Historic Environment Record (HER) any necessary fieldwork reference numbers. This number must be clearly shown on the cover of all reports and documentation relating to this project as well and being marked on all small finds;
- Submit for approval by the ACoW a method statement that fulfils the requirements and objectives of this WSI;
- Submit for approval by the ACoW their Risk Assessment and Management (RAMS) report for the works; and
- Create an OASIS online record and key fields completed (location, organisation etc.).

## 5.6 Research Objectives

The project design, fieldwork and final report should feed into the Solent – Thames Research Framework for the Historic Environment - Resource Assessments and Research Agendas (Hey, G. and Hind, J. 2014). This site is covered by section 12, in particular 12.1 Inheritance which states:

*There are no clear boundaries between Iron Age and Roman in this region although it is clear that the during the 1st century BC to early 2nd century AD there was a period of major change in the countryside. To assist in understanding this,*

*Sites with well-preserved deposits of both late Iron Age and Roman date should be given careful attention in order to investigate continuity of local tradition at these sites. Sampling strategies should ensure that as wide a range of contexts are sampled as possible. Excavations of deep, well-sealed features are required (as opposed to buildings).*

*Radiocarbon dating should be used more widely and systematically to help understand change between the late Iron Age and early Roman period.*

Other research objectives must be considered throughout the whole project programme to ensure that the fieldwork adapts to ongoing discoveries on the site which may require a change of focus in terms of sampling and interpretation.

## 5.7 Strip Map and Sample excavation

Using the combined output from the geophysical survey, trial trenching and liaison with Nick Crank (Milton Keynes Council's Senior Archaeological Officer) it is proposed to strip the area containing the greatest

density of known features. This is the south eastern corner of the development area, as shown in Appendix B-. It has been confirmed that no monitoring or recording will be required across the remainder of the site beyond the agreed limit of the strip map and sample excavation.

The strip map and sample excavation encompass an area c.8975<sup>2</sup>m and, based on the evaluation, the typical topsoil and subsoil depth over this area is 0.35m. It is therefore anticipated that approximately 3141<sup>3</sup>m of spoil shall be stripped.

A 5% contingency (450<sup>2</sup>m) of stripping will be available should significant archaeology that cannot be sufficiently characterised and recorded, extend beyond the original strip map sample boundary. The implementation of this contingency must be agreed between the client, Milton Keynes Council's Senior Archaeological Officer and the ACoW.

Minimum requirements are as follows: -

- All plant will be procured by the archaeological contractor unless supplied by the client;
- Topsoil and subsoil will be removed by mechanical excavator, under archaeological supervision, using a toothless grading bucket and top and subsoil shall be stored separately;
- The surface of the natural shall be 'cleaned' to clearly see any archaeological features;
- Features immediately visible shall be planned using a total station;
- The cleaned surface shall be allowed to weather for 48 hours and any further features revealed shall be planned;
- A review of the planned features shall be made, and a programme of sample excavation agreed;
- Sampling shall target
  - ▶ Feature intersections to establish stratigraphic sequence
  - ▶ Features likely to provide maximum evidential information
- Sampling shall be based on the following
  - ▶ Enclosure ditches 50%
  - ▶ Field boundaries 10%
  - ▶ Pits 50% -100%
  - ▶ Burials – 100%
  - ▶ Structures – 100%
- Context records for individual layers, deposits and features, and registers for small finds and soil samples will be kept according to the archaeological contractors own recording system;
- Photographic records shall be made of all features, deposits and significant in situ finds identified on site. All photos will contain a north arrow and be catalogued on a photographic register. Photography will be film and digital, however the latter must be at least 10MP, and taken in RAW and jpg file format. RAW files will be used for the project digital archive. Standard monochrome photography will be required for the project physical archive;
- All exposed surfaces and spoil shall be scanned with a metal detector operated by an experienced user, and all diagnostic finds recorded and retained;

- Site and feature levels will be taken across the excavation area and shall be tied to Ordnance Datum;

## Finds

- If any human remains are encountered during the course of fieldwork, the coroner will be informed and a licence for the Home Office obtained immediately. It is essential that the ACoW, the client and Milton Keynes Council's Senior Archaeological Officer be notified. Human remains are to remain in situ unless damage or desecration may occur, or where analysis of the remains are deemed crucial to the aims of the excavation;
- All finds deemed to be potential treasure trove will be held in a secure location and the coroner informed in line with the Treasure Act 1996;
- All finds will be retained on site, the archaeological contractor must provide a post excavation disposal policy that shall be agreed with ACoW and the Milton Keynes Council Senior Archaeological Officer ;
- All finds suitable for washing and cleaning will be done so, and marked with the unique site code previously obtained from the Milton Keynes HER;
- Finds work will comply with current ClfA standards (Chartered Institute for Archaeologists, 2014); and
- The archaeological contractor must supply a list and CV of finds specialists that may be called upon during the course of this project.

## Environmental sampling

- The archaeological contractor shall provide the name and CV or the person or organisation responsible for the collection and analysis of any environmental remains recovered on site. Should unexpected and complex remains be encountered the Historic England regional science advisor for the south east will be consulted and asked to visit the site;
- Prior to commencement of fieldwork the archaeological contractor will provide details of their environmental strategy for approval by the ACoW and the Milton Keynes Council's Senior Archaeological Officer; and
- Environmental sampling, assessment and reporting shall comply with current standards (English Heritage, 2011).

## Site monitoring

- An agreed programme of onsite monitoring will be agreed in writing prior to commencement of works, and at least one site meeting will be held with the ACoW and the Milton Keynes Council's Senior Archaeological Officer; and
- The successful archaeological contractor shall inform the ACoW at the earliest opportunity should unexpected or significant remains be identified, or technical issues, delays or health and safety incidents occur.

## 5.8 Reporting

- A draft copy of the excavation report will be submitted to the ACoW within 60 days of completion of fieldwork;

- The Milton Keynes Council's Senior Archaeological Officer will be asked to comment on the draft document, with comments required within 21 working days of submission. Note that, should the Milton Keynes Council's Senior Archaeological Officer not get an opportunity to review the report before its submission to support future planning applications it cannot be guaranteed that, in the Milton Keynes Council's Senior Archaeological Officer opinion, that it will be sufficient to meet NPPF para 199;
- Upon approval three bound copies and a pdf will be provided to the ACoW who will disseminate to all relevant persons; and
- The final approved one bound copy and a pdf of the report shall be submitted to the Milton Keynes HER within 90 days of submission of a formal condition discharge application.
- As this site is agreed to be of local/regional significance provision for the potential production of a publication report for the county journal Records of Buckinghamshire shall be included in costings. This should include production of a post-excavation assessment / UPD, though these steps may be omitted subject to subsequent discussion and agreement with the Milton Keynes Council's Senior Archaeological Officer. Documentation produced should also be uploaded to OASIS for inclusion in the ADS Grey Literature Library.

## 5.9 Archive deposition

- Upon acceptance of the final report by the ACoW, the project archive will be compiled in accordance with current best practice (Brown, 2007);
- The physical archive will be deposited with Buckinghamshire County Museum or another agreed depository;

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- The OASIS record previously logged will be completed in full;
- The digital archive will be deposited with the Archaeological Data Service (ADS); and
- Proof of archive deposition must be provided to ACoW.

## 5.10 Insurance

- The successful archaeological contractor will produce evidence of Public Liability Insurance to the minimum value of £5m and Professional Indemnity Insurance to the minimum of £5m and Profession.

## 5.11 Health and safety

- Health and Safety will take priority over all other requirements. A conditional aspect of all archaeological work is both safe access to the area of work and a safe working environment. All works undertaken as part of this project will be in full compliance with the Health and Safety at Work Act (1974) and all applicable regulations and Codes of Practice and the Construction Design Management.

- A risk assessment will be carried out in respect of the archaeological monitoring prior to commencement of the fieldwork and copies sent to the representatives of the client for approval. In addition, a point of work risk assessment will be carried out at the beginning of each working day and any control measures required clearly identified and disseminated to all site staff and visiting persons.
- Appropriate welfare facilities will be provided for site staff for the duration of the onsite fieldwork.

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# Appendix A

## Indicative masterplan



## Appendix B

# Area of Strip Map and Sample Excavation

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