Brook Lane Resource Recovery Centre
Westbury, Wiltshire

Archaeological Contribution to Environmental Impact Assessment
for Hills Minerals & Waste

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Site Code: BLW06/50

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CHAPTER xx: ARCHAEOLOGY

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Summary
Desk-based assessment of the proposal site has concluded that the potential of the site to contain archaeological deposits is low. The possibility of deposits being present which are of national or regional importance is low.

The desktop study has arrived at this conclusion from a consideration of known archaeological discoveries in the vicinity and surrounding areas, map regression, and the topographic location of the proposal site.

It is suggested that further fieldwork is not required.

Introduction
This desk-based study is an assessment of the archaeological potential of land at Brook Lane, Westbury, Wiltshire (ST 8565 5155). The report comprises the first stage of a process to determine the presence/absence, extent, character, quality and date of any sub-surface archaeological remains which may be affected by development of the area. This report deals with below-ground archaeological remains only. The potential impacts of development on buried archaeological deposits in this instance are, for the most part, clear-cut, as extraction of minerals will lead to total destruction. More subtle effects such as dewatering of previously waterlogged deposits (where organic remains are preserved) in adjacent areas and the need for ancillary facilities may lead to further damage of greater or lesser extent. ‘Damage’ may also extend even to remains which are themselves physically preserved intact, through ‘loss of legibility’; i.e., the loss of interpretability resulting from damage to surrounding deposits.

Assumptions and technical difficulties
It is axiomatic of all archaeological research that absence of evidence is not equivalent to evidence of absence. That is, the lack of previously recorded archaeological information on a site is usually the result of there having been no previous detailed investigation. Particularly in the case of subsurface remains, the absence of indicators on the surface, or, for example, on aerial photographs, is no guide to the absence of archaeological features. Equally, apparently positive indicators can be misleading or prone to misinterpretation. Aerial photography and geophysical survey can provide an indication of the presence of major features and can sometimes permit their characterization, but can almost never provide a date. Generally, the best way to determine the presence or absence of archaeology, and certainly to characterize it reliably, is by means of a range of techniques combined to
maximize the information gain, such as (where appropriate) geophysical survey, fieldwalking and some form of intrusive intervention. Usually the latter will take the form of an evaluation of a sample of the entire site (whether targeted as a result of information from the other sources, or randomized, or a combination) initially, to be followed, if required, by full excavation over the whole or (more likely) part of the site where remains are shown to be present.

**Guidance documents**

Planning permission is to be sought for the construction of a waste recycling centre. *Archaeology and Planning* (PPG16 1990) provides guidance relating to archaeology within the planning process. It points out that where a desk-based assessment has shown that there is a strong possibility of significant archaeological deposits in a development area it is reasonable to provide more detailed information from a field evaluation so that an appropriate strategy to mitigate the effects of development on archaeology can be devised:

Paragraph 21 states:

‘Where early discussions with local planning authorities or the developer’s own research indicate that important archaeological remains may exist, it is reasonable for the planning authority to request the prospective developer to arrange for an archaeological field evaluation to be carried out...’

Should the presence of archaeological deposits be confirmed further guidance is provided. *Archaeology and Planning* stresses preservation *in situ* of archaeological deposits as a first consideration as in paragraphs 8 and 18.

Paragraph 8 states:

‘...Where nationally important archaeological remains, whether scheduled or not, and their settings, are affected by proposed development there should be a presumption in favour of their physical preservation...’

Paragraph 18 states:

‘The desirability of preserving an ancient monument and its setting is a material consideration in determining planning applications whether that monument is scheduled or unscheduled...’

However, for archaeological deposits that are not of such significance it is appropriate for them to be ‘preserved by record’ (i.e., fully excavated and recorded by a competent archaeological contractor) prior to their destruction or damage.
Paragraph 25 states:

‘Where planning authorities decide that the physical preservation *in situ* of archaeological remains is not justified in the circumstances of the development and that development resulting in the destruction of the archaeological remains should proceed, it would be entirely reasonable for the planning authority to satisfy itself ... that the developer has made appropriate and satisfactory provision for the excavation and recording of remains.’

In the case of Scheduled Ancient Monuments (and their settings), the provisions of the *Ancient Monuments and Archaeological Areas Act* (1979) also apply. Under this legislation, development of any sort on or affecting a Scheduled Monument requires the Secretary of State’s Consent.

These principles are enshrined in Wiltshire County Council’s Structure Plan (WCCSP 2001). Policy HE2

‘Features of archaeological or historic interest and their settings should be protected from inappropriate development. Where nationally important archaeological or historic remains, whether scheduled sites or not, are affected by proposed development there should be a presumption in favour of their physical preservation *in situ*.

‘7.12 Where nationally important archaeological or historic remains, whether scheduled or not, and their settings, are affected by proposed development there should be a presumption in favour of their physical preservation *in situ*. The desirability of preserving archaeological sites and their setting is a material consideration in the determination of planning applications involving such sites.

‘7.13 Where there is reason to believe that significant archaeological remains exist on a development site, but where their extent and importance are uncertain, it will normally be appropriate for the developer to arrange for a field evaluation to be carried out to furnish the information on which to base a planning decision. The Libraries and Heritage Archaeological Service should be consulted on proposals that might affect sites and areas of archaeological and historic value.’

The Structure Plan, however, goes on to take a slightly broader view than PPG 16:

‘7.16 In the formulation of planning policies for the wider historic and archaeological landscape, authorities should take account of the historical
dimension of the landscape as a whole, including historical evidence afforded by the existence of ancient trackways such as the Ridgeway, rather than concentrate on selected sites. Adequate understanding is an essential preliminary and authorities should assess the wider landscape at an early stage in development plan preparation. Plans should protect its most important components and encourage development that is consistent with maintaining its overall historic character…'

The West Wiltshire District Plan adopts a similar general position and makes more specific provisions (WWDP 2004):

‘Archaeology

‘Nationally Important Sites

‘C13 All Scheduled Ancient Monuments and other nationally important sites and monuments will be protected and preserved in situ. Planning permission for development proposals in or near such sites which would be damaging and/or detrimental to the monument and its setting will not be permitted.

‘2.3.24 Archaeological remains are a finite and irreplaceable resource providing information about the past. West Wiltshire has a rich and varied archaeological heritage including sites and monuments from many differing historical periods, such as the Prehistoric, Celtic, Romano-British, Saxon and Medieval periods. The District has a number of Scheduled Ancient Monuments recognised for their national importance. In addition the County Archaeological Service has identified a large number of sites of comparable importance, which are listed in the County Sites And Monuments Record. The nature of archaeology will also mean that some sites of national importance may as yet remain undiscovered, and these too will be worthy of physical protection. With all archaeological remains of national importance there is a presumption in favour of their physical preservation if they and their settings are affected by proposed development. Consequently, all known monuments of national importance, both the Scheduled Ancient Monuments and the non-scheduled monuments identified by the County Archaeological Service, are worthy of preservation in situ. All Scheduled Ancient Monuments and urban and rural areas of known archaeological interest are identified on the Proposals Map.
Non-scheduled monuments and areas of higher archaeological potential are identified within Appendix Ab. Developers are advised to seek the advice of the County Archaeological Service when proposed development would impact on any of these sites.

‘Archaeological Field Evaluation

‘C14 An archaeological field evaluation will be required where development proposals would affect a site of known archaeological interest or where evidence suggests the existence of such a site. An archaeological field evaluation may be requested prior to a decision on an application for development where the archaeological value of the site is as yet unknown.

‘2.3.25 Where development proposals affect a site of known archaeological interest or evidence suggests the existence of such a site, the District Council will continue to seek specialist advice from the County Archaeological Service. The archaeological importance of some sites is not yet known and on the advice of the County Archaeologist the Council may request an archaeological field evaluation of the site to be submitted with any application for planning permission.

‘Archaeological Assessment

‘C15 Archaeological assessment will be required for development proposals within the Areas of Archaeological Interest, or affecting an area of 1 hectare or more within Areas of Higher Archaeological Potential, as shown on the Proposals Map. The results should be submitted with the planning application.

‘2.3.26 The County Archaeological Service has identified 10 Areas of Higher Archaeological Potential within the rural landscape areas of West Wiltshire and 5 Areas of Archaeological Interest within the historic town centres of West Wiltshire. In these areas, development proposals should be supported by a desk based archaeological assessment usually utilising the County Sites and Monuments Record. Where an archaeological issue is identified, the Council may request an archaeological field evaluation of the site in accordance with Policy C14.

‘Archaeological Investigation and Recording

‘C16 In considering applications for development on sites of archaeological value, or in areas of archaeological significance, where the physical preservation of remains is not
warranted, planning permission will be granted provided the archaeological value of the site is adequately recorded. Consideration will be given to the use of conditions and/or agreements to ensure that adequate access, time and resources are available to allow investigation, recording and dissemination of archaeological evidence prior to the start of development.

‘2.3.27 Development plans cannot require developers to finance archaeological works in return for planning permission. Where development threatens sites of archaeological interest the ideal situation is to preserve the site in situ. However, in some cases such preservation is not merited, so the District Council will require the developer to enter into an agreement to excavate and record the site and disseminate the results prior to the commencement of any development.’

The site lies within an Area of Higher Archaeological Potential as defined on the Proposals Map. This area appears to have been defined as a rough buffer zone around a Scheduled Ancient Monument (SAM) and it is impossible to know what criteria have been used to extend it in the direction of the site, if indeed such an extension involved specific considerations rather than the general desire to protect the setting of the SAM. The district plan calls automatically for an assessment of any site of this size within an Area of Higher Archaeological Potential.

**Baseline Conditions**

i. **Methodology**

The assessment of the site was carried out by the examination of pre-existing information from a number of sources recommended by the Institute of Field Archaeologists paper ‘Standards in British Archaeology’ covering desk-based studies. These sources include historic and modern maps, the Wiltshire Sites and Monuments Record, aerial photographic collections (English Heritage and Cambridge University), geological maps and any relevant publications or reports.

ii **Site description, location and geology**

Westbury nestles under the north-western scarp of Salisbury Plain, at around the 70m contour, with a spur of the plain at 140m south of the town, the chalk plain itself rising to over 200m immediately to the south of this. The Bitham and Biss brooks both rise next to the town, and flow north, joining to form the river Biss around 5km to the north, and there are a number of other springs along the foot of
the escarpment in the vicinity. Brook Lane is on the northern outskirts of the town, leading to the Biss Brook.

The site currently consists of waste ground, partly grassed over. The development area is centred on NGR, ST 8565 5155, on the south side of Brook Lane, on the northern outskirts of Westbury in an industrial estate. An extensive railway yard occupies the area south of the site and the Biss Brook marks the western boundary. The site is located in an area of quite complex geology, mapped as Westbury Ironstone with a band of Todber Freestone Member (Corallian limestone) roughly along the line of Brook Lane (BGS 2000) and alluvium in the valley of the Biss Brook. It is flat, at a height of approximately 61m above Ordnance Datum, although the natural topography appears to slope downwards to the north.

iii Significance criteria
The significance of previously recorded remains can be assessed using the criteria of the Monuments Protection Programme, and the criteria used by the Secretary of State in determining Scheduling. These are laid out in Annex 4 of PPG 16, and include: Period; Rarity; Documentation; Group Value; Survival/Condition; Fragility/Vulnerability; Diversity; Potential. The significance of historical and cartographic information is a matter for interpretation.

Existing Conditions
i Archaeological background
The desk-based assessment presented as Annexe xxxx1 provides the detailed study of the available archaeological records, cartographic and documentary sources, aerial photograph collections and geotechnical borehole data. In summary, it is noted that while the broader area contains archaeological sites of all periods, the immediate vicinity of the site has produced nothing of much archaeological interest, and the site itself has been at least partially quarried and backfilled, with made ground of various depths across the whole site. It seems unlikely that the development would have any significant impact on archaeological deposits.

iii Scheduled Ancient Monuments
There are no Scheduled Ancient Monuments on the site, but SAM 34182/01-02, earthwork remains of a deserted medieval village, covers an extensive area just to the north and west
of the proposal site. Any development would therefore have to take into account not only the Scheduled Area itself, but also its setting and historic landscape character.

iv Listed Buildings
There are no listed buildings on the site or in the immediate vicinity.

v Registered Parks and Gardens
There are no registered parks or gardens on the site.

vi Registered Historic Battlefields
There are no historic battlefields on the site.

ix Historic hedgerows
There are no hedgerows on the site that would qualify as ‘important’ as defined by Schedule 1 of the Hedgerows Regulations 1997.

g) Potential impacts of the proposal
The examination of historic, archaeological and cartographic sources indicates that there is a at best only a low potential for subsurface archaeological and historical resource to be present in the area. The impact on such deposits, if present, has two components: a) The impact is wholly or partially destructive for the areas of foundations and services, depending upon design; b) deposits in areas where the development is only superficial may still be subject to inadvertent or indirect damage from landscaping, passing traffic, or the loss of legibility.

Although details of the foundation design have yet to be finalized, a pit of some 4.5m depth is among the proposals. This would likely be the only component of the design that would penetrate the superficial (archaeologically sterile) deposits on the site, and it is presumed that this pit would fall within the previously quarried and backfilled area, thus posing no threat to any archaeology.

h) Mitigation Measures
It is considered that the archaeological potential requires no mitigation measures.
i) Discussion

In considering the archaeological potential of the study area, various factors must be taken into account, including previously recorded archaeological sites, previous land-use and disturbance and future land-use.

The above detail indicates that the proposal site lies within an area of modest archaeological interest. There are a small number of archaeological sites nearby but as yet no known deposits on the site itself, while immediately adjacent areas have been evaluated and found to contain nothing of archaeological interest.

The precise extent of the 19th-century (and later) quarrying on the site has not been determined but it is likely to have occupied a considerable part, if not all, of the proposal area. Even if most of the site has not been quarried, it has been extensively levelled up with made ground and imported soils, so that the development is unlikely to have any significant impact on archaeologically relevant levels.

Although the site falls partly within an Area of Higher Archaeological Potential defined in the District plan, it seems that the line defining this is somewhat arbitrary in this direction, presumably based on proximity to the Scheduled Ancient Monument. The historic character of the landscape surrounding this monument has already been thoroughly compromised by industrial development.

j) References


WWDP, 2004, *West Wiltshire District Plan 1st alteration*
Summary table

<table>
<thead>
<tr>
<th>Topic Area</th>
<th>Description of impact</th>
<th>Geographical level of importance of issue</th>
<th>Impact</th>
<th>Nature</th>
<th>Significance</th>
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<td>Cultural Heritage</td>
<td>Damage or destruction of archaeological deposits</td>
<td>?</td>
<td>Adverse</td>
<td>Lt, IR</td>
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</table>

**Key**

- I - International
- N - National
- R - Regional
- D - District
- L - Local
- St - Short term
- Lt - Long term
- R - Reversible
- IR - Irreversible