

P25-269



MARGAM SUBSTATION

Written Scheme of Investigation

for Laing O'Rourke

29/08/2025

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for Laing O'Rourke

August 2025

Ver 1.3

PROJECT INFORMATION:

HA JOB NO.	P25-269
NGR	278553, 186376
PARISH	Margam Moors
COUNCIL	Neath Port Talbot

PROJECT TEAM:

PROJECT MANAGER, AUTHOR & GRAPHICS	Kit Byrom
APPROVED BY	Andy Towle
VERSION COMMENTS	Incorporated comments from both client and Heneb



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WRITTEN SCHEME OF INVESTIGATION

1. Introduction

- 1.1.1. Laing O'Rourke has commissioned Headland Archaeology (UK) Ltd to agree a programme of archaeological work ahead of site works associated with the construction of a new substation. The works specified here are designed to ensure that appropriate mitigation of development impacts on archaeological remains are undertaken to meet the requirements of a planning condition associated with the development. An associated cable route is also planned to the south of the substation to supply the nearby Port Talbot steel works. The latter will take place under permitted development rights and a separate Written Scheme of Investigation (WSI) has been prepared addressing the potential impacts and proposed mitigation work¹.
- 1.1.2. The mitigation works comprise a survey of selected historic ditch profiles, and detailed sampling of peat in the area of the creation of a working platform where excavation activities will reach the peat layer. This WSI builds on previous desk-based assessment², and consultation with Neath Port Talbot Council's archaeological advisors at Heneb.
- 1.1.3. The methods described in this WSI follow relevant Chartered Institute for Archaeologists (CIfA) Standards and Guidance comprising the *Code of Conduct* (2022), *Standard for archaeological monitoring and recording* (2023), *Standard and guidance for the archaeological investigation and recording of standing buildings and structures* (2020), *Standards and Guidance for archaeological watching brief* (2014), *Standard and guidance for the creation, compilation, transfer and deposition of archaeological archives* (2020), and *Standard and guidance for the collection, documentation, conservation and research of archaeological materials* (2020).

2. Site description

2.1. Location and Topography

- 2.1.1. The Proposed Development Area (PDA) is situated at NGR278553, 186376 on land near Port Talbot Steelworks, Port Talbot, SA13 2NG (see Illus 1). The site is currently partially in use as small substation to the west, with the east being covered by low-lying grass scrub land subdivided by drainage ditches flanked by mature trees. The site is located mid-slope between Mynydd Margam and the coastline. It is a roughly flat site sitting at 3m Above Ordnance Datum (AOD).

2.2. Geological background

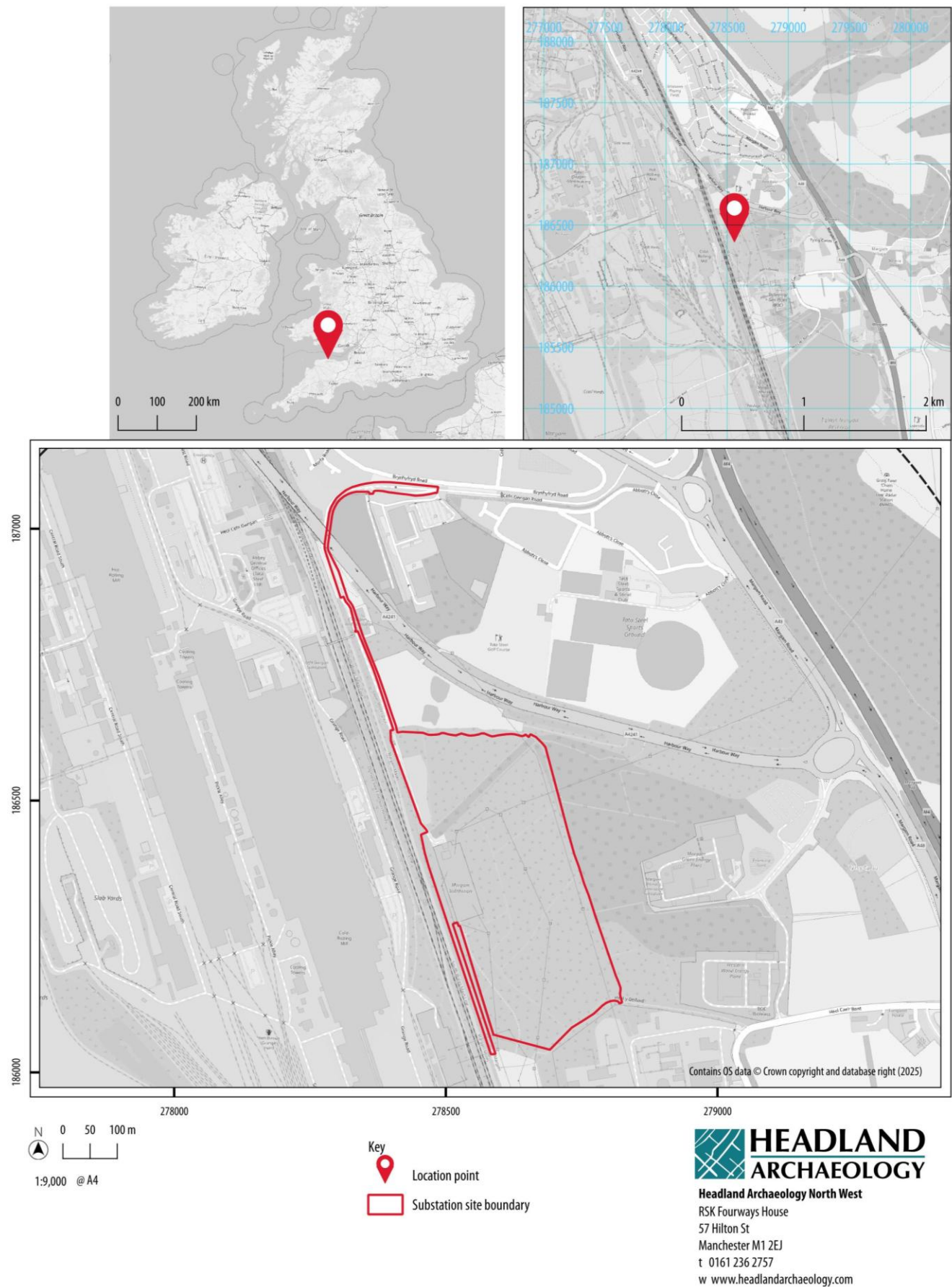
- 2.2.1. The underlying solid geology is recorded by BGS³ as South Wales Middle Coal Measures Formation – mudstone, siltstone and sandstone. This sedimentary bedrock formed between 318 and 309.5 million years ago during the Carboniferous period.
- 2.2.2. Superficial deposits are recorded as Tidal Flat Deposits – clay, silt and sand. These sedimentary deposits were formed between 11.8 thousand years ago and the present during the Holocene. The tidal flat deposits have been largely recorded in legacy records as alluvium. The two have similar lithologies with the former being deposited in salt water or brackish conditions while the later is deposited in freshwater conditions. The study of any micro fauna such as diatoms and foraminifera is required to distinguish between the two. Such studies can also inform on local sea level change.

¹ Headland Archaeology, 2025

² Stantec, 2025

³ British Geological Survey, 2025a

- 2.2.3. Peat has also been logged in many of the historic boreholes in and around the site (see below). This is an important deposit as it is made up of organic material suitable for scientific dating and palaeoenvironmental assessment/ analysis. The peat sits between two layers of clay so understanding the date and nature of this deposit could help with reconstructing local sea level change, along with helping to establish a broader understanding of how the surrounding landscape has changed in the Holocene.



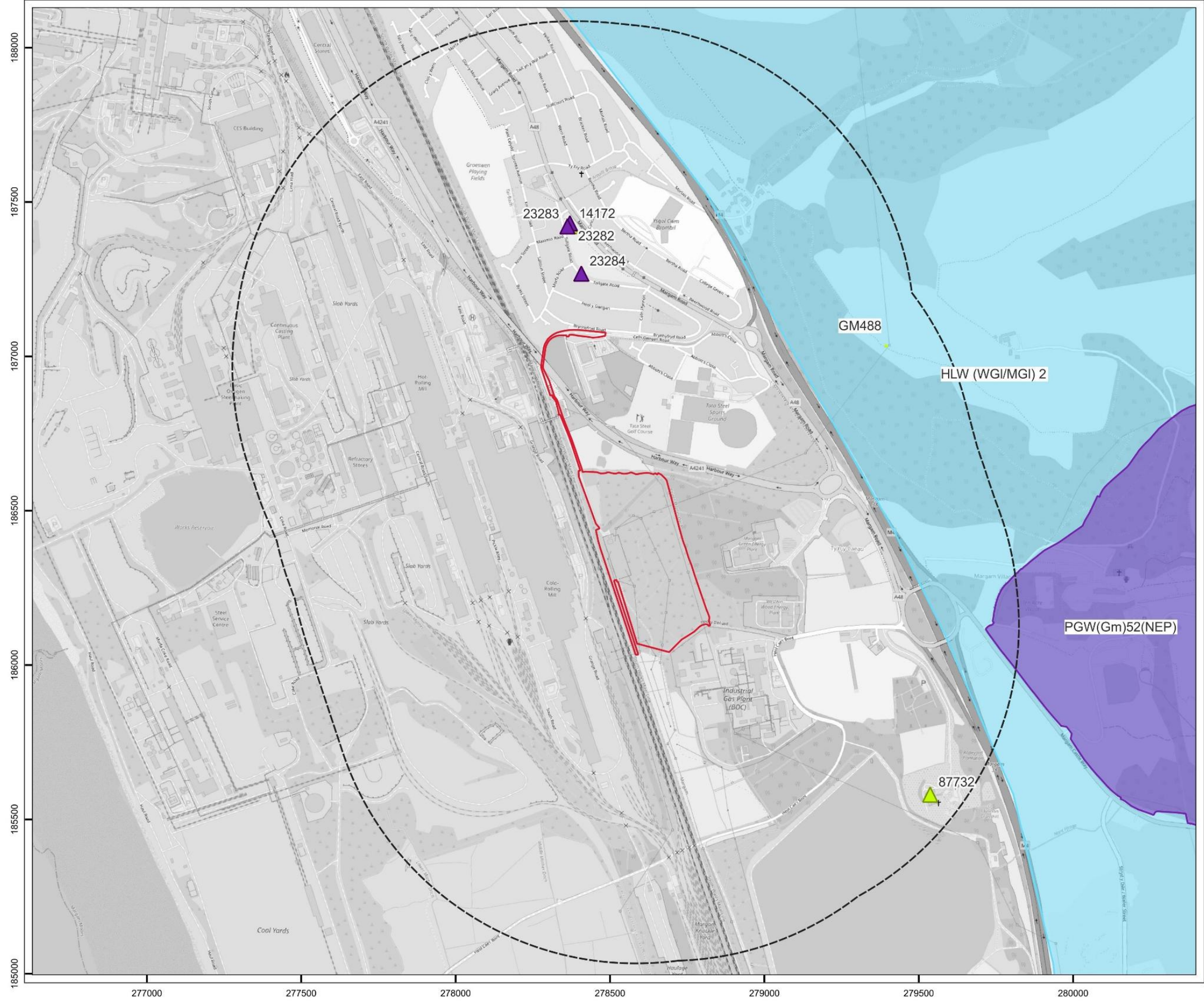
Illus 1 Site location

3. Archaeological and historical background

- 3.1.1. There are no designated assets located within the red line boundary.
- 3.1.2. There are eight designated assets located within a wider 1km study area (Illus 2). These comprise one Scheduled Monument, two grade II* listed building, three grade II listed buildings, one registered park and garden and one historic landscape.
- 3.1.3. There are three non-designated assets located within the substation site:
- A layer of peat is recorded within the site with the potential for preservation of paleoenvironmental remains of prehistoric date;
 - Historic ditches running through the site noted on historic mapping; and
 - An historic trackway – Heol Y Deiliaid – located on the sites southern border, also shown on historic mapping.
- 3.1.4. The potential for other archaeological remains is considered to be low given the low-lying wet ground which has been drained for agricultural use during the Post-Medieval period.
- 3.1.5. There are 23 non-designated assets located within the 1km study (Illus 3) area comprising:
- A Medieval grange, holy well, and historic saltmarsh landscape;
 - A Post-medieval colliery, gas works, lodge, house, school, rail corridor, coal level, house platform, structure, farm, and a ship timber find;
 - A Modern gas works, industrial estate, colliery and tramway, structures, radar station, and stone circle.
- 3.1.6. 1862 OS mapping (Illus 4) shows an historic trackway running along the southern boundary of the substation site, functioning as an access to Hen Biniwn (00740w), a non-designated Medieval grange.
- 3.1.7. The desk-based assessment⁴ identifies that the following:
- 3.1.8. Evidence for prehistoric activity within the Study Area in the form of Bronze Age barrows, cairns and Iron Age hill forts, are concentrated on the slopes of Margam Mountain to the east. Features such as this are unlikely to be found in the lower lying land where the Site is located, with any prehistoric remains most likely to comprise residual finds indicative of exploitation of coastal resources. Peat deposits which have a raised potential for preservation of palaeoenvironmental remains of prehistoric date are recorded within the Site.
- 3.1.9. A Roman road (SN:86) passes through the Study Area, approximately 550m east of the Site however, the lower lying land where the Site is located is likely to have been unsuitable for occupation during the Romano-British period. Accordingly, there is a limited potential for evidence of settlement activity dating to this period to be present within the Site, with any remains most likely to comprise residual finds indicative of the continued exploitation of coastal resources.
- 3.1.10. The Site is located away from the focus of medieval settlement activity, which was dominated by the religious centre of Margam to the east, with the closest known medieval settlement to the Site comprising Hen Biniwn grange (SN:87) approximately 400m to the west. The line of the Heol y Deiliaid which is purported to follow the route of a medieval paved causeway connecting Hen Biniwn grange to Margam Abbey (SN:6) runs along the southern boundary of the Site. The line of the road appears to be preserved by two parallel ditches and hedgerows, and it is possible that further below ground remains could also be present. Drainage ditches within the Site (as discussed in paragraph 5.3.4) may also be of potential medieval origin. These landscape features are of heritage interest in relation to the development and historic use of the landscape, although are not likely to be of sufficient value to be considered nationally significant (equivalent to a scheduled monument).
- 3.1.11. Several extant drainage ditches of at least 19th century date (Illus 5), although possibly of earlier post-medieval or medieval origin, extend through and/or define the boundary of the Site. These include the Upper Mother Ditch and Wal Ddu. Although of heritage interest in relation to the development of the agricultural landscape these are not considered nationally significant (equivalent to a scheduled monument). There is also a potential for further, as yet unknown post-medieval agricultural remains, although these are likely to be of limited historic value.

⁴ Stantec, 2025

- 3.1.12. Tidal flat deposits containing peat horizons are recorded within the Site to a depth of 4.9m BGL. These deposit sequences are of potential palaeoenvironmental interest and can be used to reconstruct past environments and further understand the depositional history of dynamic coastal environments, particularly those which have been subjected to historic land management strategies such as land drainage and reclamation. The anaerobic conditions within peat and alluvium also provide favourable conditions for the preservation of organic archaeological remains such as those made of wood, leather and animal and plant fibres.



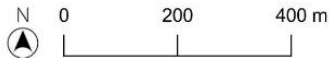
NORTH WEST

RSK Fourways House
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0161 236 2757
www.headlandarchaeology.com

- Key
- Substation site boundary
 - 1km study area
 - Listed Buildings
 - Grade II*
 - Grade II
 - Scheduled Monument
 - Registered Parks and Gardens
 - Cadw historic landscapes

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Illus 2 Designated assets within 1km study area



NORTH WEST

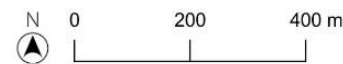
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Key

- Substation site boundary
- 1km study area
- Non-designated points
- Non-designated areas
- Non-designated linears
- Historic Landscape Character Area

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Illus 3 Non-designated assets within 1km study area



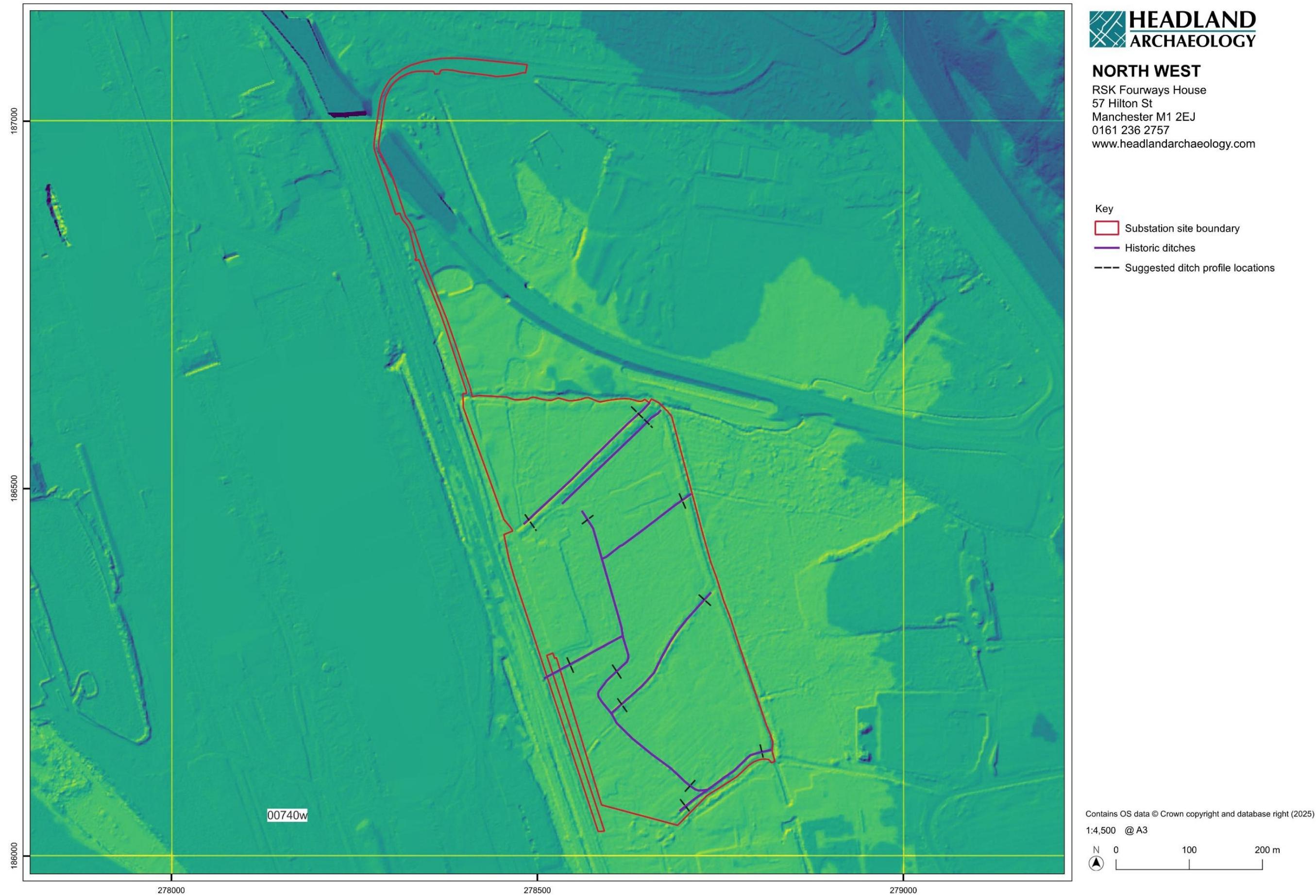
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Key
 Substation site boundary

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N 0 100 200 m

Illus 4 1864 OS 1 inch Old Series Sheet XXXVII map extract



Illus 5 Historic ditches with proposed locations for recording marked on processed LiDAR data extract

Policy context

- 3.1.13. Planning Policy Wales (PPW) (Edition 12) (PPW12) provides the national planning policy framework for the consideration of the historic environment, and this is supplemented by guidance contained in Technical Advice Note 24: The Historic Environment and in associated best practice notes issued by Cadw. In general terms, policy is concerned with the protection of the significance of historic assets (including the contribution made by setting to that significance) and it affords greater protection to assets with statutory and non-statutory designations.
- 3.1.14. Heritage and conservation forms one of the core planning principles of PPW12 (paragraph numbers in bold text):

(6.1.5) "The historic environment can only be maintained as a resource for future generations if the individual historic assets are protected and conserved."

- 3.1.15. PPW12 confirms that:

(6.1.5) "the planning system must take into account the Welsh Government's objectives to protect, conserve, promote and enhance the historic environment as a resource for the general well-being of present and future generations".

(6.1.7) "It is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way."

- 3.1.16. Sections of PPW12 refer to specific historic assets as follows:

Listed buildings

"There should be a general presumption in favour of the preservation or enhancement of a Listed Building and its setting, which might extend beyond its curtilage. For any development proposal affecting a Listed Building or its setting, the primary material consideration is the statutory requirement to have special regard to the desirability of preserving the building, its setting or any features of special architectural or historic interest which it possesses." (PPW12, 6.1.10).

Historic landscapes

"The Welsh Government seeks to protect areas on the register of historic landscapes in Wales" (PPW12, 6.1.20)

"The register should be taken into account in decision making when considering the implications of developments which meet the criteria for Environmental Impact Assessment" (PPW12, 6.1.21).

"The register should ensure that necessary change is accommodated without sacrificing the essential integrity and coherence of historic landscape areas." (TAN24, 7.6).

Undesignated archaeological remains

"The conservation of archaeological remains and their settings is a material consideration in determining planning applications, whether those remains are a Scheduled Monument or not." (PPW12, 6.1.23).

"In cases involving less significant archaeological remains, planning authorities will need to weigh the relative importance of the archaeological remains and their settings against other factors, including the need for the Proposed Development." (PPW12, 6.1.25).

- 3.1.17. The Neath Port Talbot Local Development Plan⁵ contains policy SP 21 Built Environment and Historic Heritage, which states:

The built environment and historic heritage will, where appropriate, be conserved and enhanced through the following measures:

- 1. Encouraging high quality design standards in all development proposals;*
- 2. Protecting arterial gateways from intrusive and inappropriate development;*
- 3. Safeguarding features of historic and cultural importance;*
- 4. The identification of the following designated sites to enable their protection and where appropriate enhancement:*

- (a) Landscapes of Historic Interest;*
- (b) Historic Parks and Gardens;*
- (c) Conservation Areas;*
- (d) Scheduled Ancient Monuments; and*
- (e) Listed Buildings and their curtilage.'*

- 3.1.18. The Vale of Glamorgan Local Development Plan (Vale of Glamorgan Council, 2017) contains policy MD8: Historic Environment, which states:

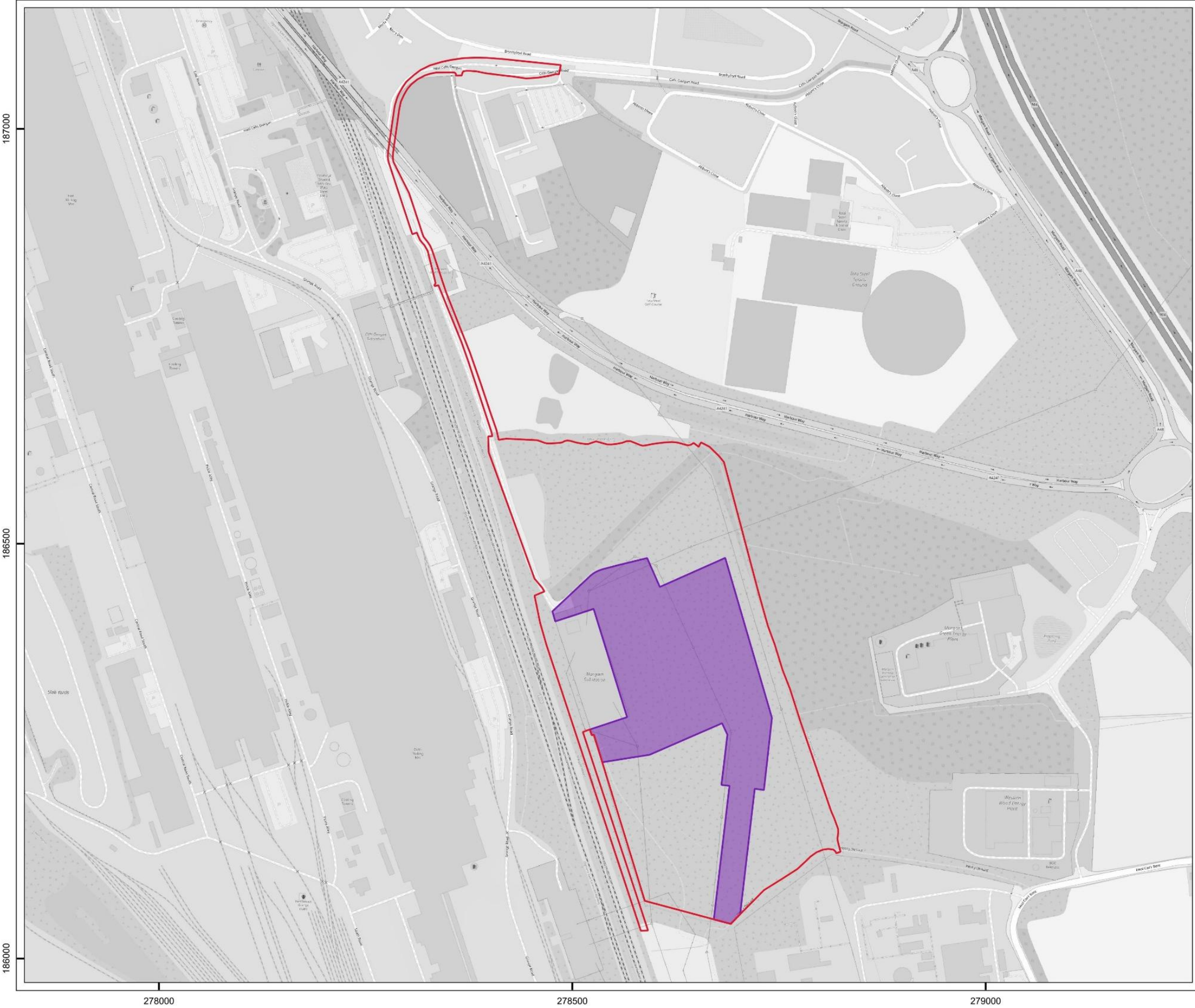
'Development proposals must protect the qualities of the built and historic environment of the Vale of Glamorgan, specifically:

- 1. Within conservation areas, development proposals must preserve or enhance the character or appearance of the area;*
- 2. For listed and locally listed buildings, development proposals must preserve or enhance the building, its setting and any features of significance it possesses;*
- 3. Within designated landscapes, historic parks and gardens, and battlefields, development proposals must respect the special historic character and quality of these areas, their settings or historic views or vistas;*
- 4. For sites of archaeological interest, development proposals must preserve or enhance archaeological remains and where appropriate their settings'.*

[5 Neath port Talbot County Borough Council, 2016](#)

5. Impact assessment

- 5.1.1. In general terms, direct impacts upon known or previously unknown buried archaeological remains have the potential to occur during development as a result of intrusive groundworks causing their truncation, fragmentation or complete removal. In respect of the proposed development, activities which may have an impact upon buried archaeological remains therefore could include construction enabling works, any areas of cut and fill, bulk excavation and topsoil stripping, site compound establishment and excavations for container footings, access roads, utilities/buried cabling and landscaping.
- 5.1.2. It is not anticipated that proposals to develop the site should represent a conflict with legislation or national or local planning policies relating to the historic environment. The likely development impacts are not considered sufficiently significant to warrant refusal of a planning application to develop the site.
- 5.1.3. No direct impacts on designated historic assets have been identified as a result of the proposed development of the substation during the production of this WSI. The likely area of truncation associated with the substation development is shown on Illus 6.
- 5.1.4. A non-designated historic ditch runs from north to south within the proposed substation site, with two adjoining arms running to the north east and south west (Illus 5) These will be directly impacted by the proposed development, as parts of this asset are to be backfilled, and further areas are to be enhanced to increase capacity.
- 5.1.5. A programme of surveying is proposed to be carried out at the ends of each ditch to provide an enhanced record of the historic ditches which will add to the data captured in LiDAR and historic mapping.
- 5.1.6. Non-designated peat deposits at the site will be directly impacted by intrusive groundworks at 4m+ below the current ground level associated with the proposed development, specifically the area of the creation of a working platform and a re-directed drain.
- 5.1.7. A paleoenvironmental sampling strategy is proposed to provide a detailed record of peat deposits encountered within the footprint of the area for the creation of a working platform.



NORTH WEST

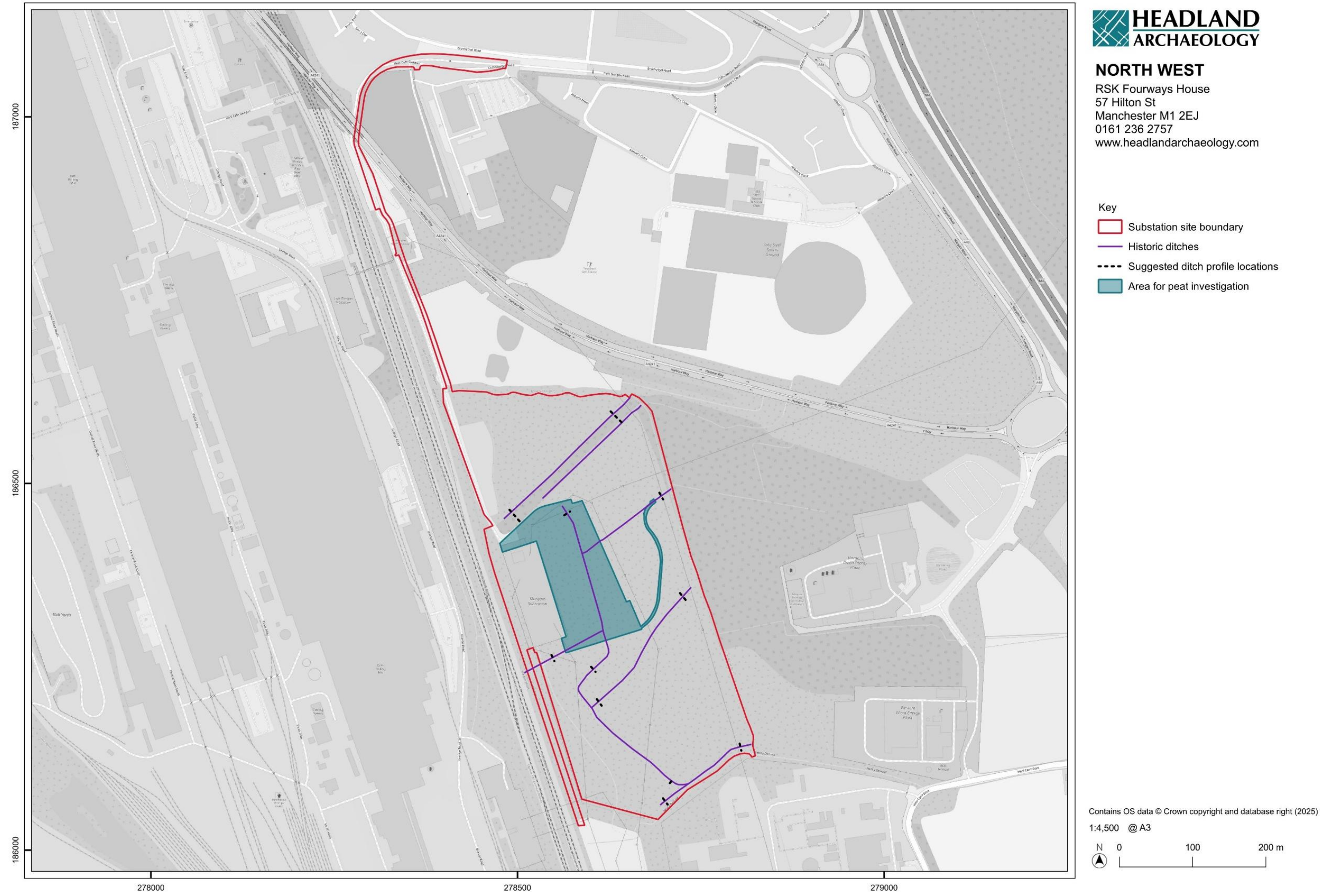
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- Key
-  Substation site boundary
 -  Area of potential truncation

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N 0 100 200 m

Illus 6 Area of truncation



Illus 7 Proposed mitigation locations

6. Aims and Objectives

- 6.1.1. The specific aim of the mitigation works is to facilitate discharge of an archaeological planning condition.
- 6.1.2. The work will be focussed on two components of the historic environment within the site. The drainage ditches and peat deposits.
- 6.1.3. Multiple historic ditches will be backfilled or altered during construction works for the proposed development. It is proposed that 11 profiles of these ditches are surveyed to provide a more detailed record to supplement existing information.
- 6.1.4. The specific objectives of the ditch survey are to:
- Make a competent record of the location and character of historic ditches encountered in the substation site boundary;
 - Prepare a report on the findings of the survey; and
 - Deposit the archive with an appropriate repository and submit the completed report to the HER.
- 6.1.5. A layer of buried peat has been identified during previous ground investigations as a discontinuous deposit recorded at between 4m and 20m BGL. It is anticipated that in the area of the creation of a working platform it will be possible to undertake monitoring and paleoenvironmental sampling to make a baseline record for this deposit in these locations.
- 6.1.6. The objectives of the geoarchaeological monitoring and sampling are:
- To complete sampling, radiocarbon dating and paleoenvironmental analysis of peat deposits (if encountered) during excavations for the creation of a working platform. The results will mitigate the development impact on the peat and constitute a baseline of paleoenvironmental data for future archaeological work in the area.
- 6.1.7. The resulting archive (finds and records) will be organised and deposited with an appropriate museum/archive repository to facilitate access for future research and interpretation for public benefit.
- 6.1.8. The results of the three elements will be assembled into a single report for submission to the local authority and the archive of records and artefacts will be deposited in an appropriate local repository.

8. Methodology

8.1. Programme

- 8.1.1. Prior to commencement an HER record will be initiated and a site code requested from Heneb. The allocated project reference and site code will be used in all future deliverables.
- 8.1.2. Heneb will be notified of the groundworks programme in advance of the works by the Client or their Principal Contractor, who will arrange for site attendance by suitably qualified personnel.
- 8.1.3. The archaeological survey of the ditches will be undertaken ahead of the ground works in the respective areas. The sampling of the peat deposits will need to be undertaken during the excavations for the creation of a working platform which will require careful co-ordination with the contractor undertaking that work. The works will be undertaken monitored by suitably qualified archaeologists and geo-archaeologists. Regular communication between the attending staff and/or off-site supervisors/managers and the client contact will be required to discuss intended upcoming works and plan accordingly.
- 8.1.4. Upon completion of the archaeological investigations and recording, a report will be produced which will describe the findings of the investigation.
- 8.1.5. The exact timing of commencement is subject to confirmation of the project programme with the client. Heneb will be informed in advance of commencement.

8.2. Project Team

- 8.2.1. Headland Archaeology (UK) Ltd is a Registered Organisation and abides by the Codes of Conduct (CIfA 2014) and Approved Practice and Standards of the Chartered Institute for Archaeologists. The company has all the necessary technical and personnel resources for the satisfactory completion of the work. Alternatively, the client may wish to appoint another archaeological contractor who should also be a CIfA Registered Organisation. The appointed archaeological contractor should confirm with Heneb that the works will be undertaken in accordance with this WSI.
- 8.2.2. The project will be managed by Kit Byrom ACIfA. The field team will comprise suitably qualified and accredited archaeologists to undertake investigation, recording and peat sampling. Personnel will be confirmed to Heneb in advance of the commencement of works. The project team will familiarise themselves with the background to the site and will be aware of the project's aims and methodologies.

8.3. *Health and safety*

- 8.3.1. The field work will be undertaken in accordance with the health and safety procedures as set out in:
- The Health and Safety Work Act (1974) and related legislation; and
 - The Federation of Archaeological Managers and Employers' Health and Safety Manual (2010).
- 8.3.2. Site access and health and safety documentation will be prepared by the archaeological contractor. Site personnel will be briefed on the content of the risk assessment, in particular the known and potential hazards, and will ensure that control measures and PPE requirements are adhered to during the implementation of the works.
- 8.3.3. The archaeological contractor will work in compliance with the client and principal contractor's health and safety requirements.
- 8.3.4. The activities of any Headland Archaeology employees on site are covered by Headland's own insurance.

8.4. *Access*

- 8.4.1. Access to the site for inspection and recording will be secured by the client.

8.5. *Site setup*

Welfare

- 8.5.1. Welfare facilities will be provided by the Client.

Parking

- 8.5.2. Provision will be made by the Client.
- 8.5.3. Measures to ensure road safety of site staff and other road users will be addressed in the RAMS, and care will be taken when entering and leaving site.

Security

- 8.5.4. The Client will be responsible for site security and fencing.

8.6. *Monitoring*

- 8.6.1. Each stage of work described in this WSI can be monitored by Heneb if required.

8.7. *Historic ditch survey*

- 8.7.1. The key activities for this element of the works will be to:
- Locate and accurately plot profiles of selected ditches (Illus 5).
 - Make a complimentary record of heritage assets by photography and, if appropriate, sketch drawings.
 - Cross-reference to historic plans, LIDAR and aerial photography.
 - Produce a report that includes a location map showing all visible archaeological remains recorded, , hachure plans and profiles of archaeological features.

- 8.7.2. The survey will be undertaken using survey grade GPS and/or a total station theodolite at a scale of 1:1000; tree cover may make GPS survey difficult in some places. Detail recorded by the survey equipment should be downloaded into CAD or GIS software on a tablet or laptop computer, checked and annotated in the field. The survey will be tied into the OS Grid using mapping grade GPS or other appropriate methods. The survey drawings will be integrated with photographs of assets and presented in a report.
- 8.7.3. Data will be gathered in the field as spot height, line and polygon data as deemed appropriate in the field.
- 8.7.4. Spot height survey will record the historic ditches and fully illustrate all variations in the area being studied. Spot heights will be converted into contours, shaded relief and/or hachured plans as appropriate following the completion of the spot height survey using QGIS software.
- 8.7.5. Photographs (digital SLR to a minimum of 12 megapixels in high resolution RAW or TIFF format) will be taken as appropriate, to record each feature, the Site, and landscape context, including an appropriate scale measure. Images will be saved in RAW, TIFF and JPEG formats. The use of camera phones to take the primary record is not acceptable.
- 8.7.6. This photographic record may be supplemented with digital images obtained using a pole mounted camera (GoPro Hero 8 Black or similar) to produce near vertical images.

Reporting

- 8.7.7. On completion of the fieldwork, the site records will be checked and cross referenced. Any artefacts and samples recovered will be sent along with contextual information to the relevant specialists for analysis.
- 8.7.8. The report will contain (as a minimum):
- A non-technical summary with Welsh translation;
 - A table of contents;
 - An introduction with acknowledgements, including a list of all those involved in the project and the location and description of the fieldwork area;
 - A statement of the project aims and objectives;
 - An account of the investigation methodology undertaken, and an assessment of its effectiveness;
 - A description of the archaeological findings;
 - Plans and section drawings of the selected ditches at appropriate scales;
 -
 - A discussion and assessment of the results with a statement of the heritage significance of any identified archaeological features/sites on a local/regional/national scale;
 - Interpretive maps, plans, drawings and photographs as appropriate;
 - A bibliography of sources consulted;
 - A list of contents of the project archive and a statement of its location/proposed repository; and
 - a copy of the HER reporting form.
- 8.7.9. The project archive will consist of all original records, artefacts and documentation that relates to the survey. Copies of the written scheme of investigation, report and any relevant correspondence will be included.
- 8.7.10. An HER summary will be completed, and the final report uploaded to the HER where it will be incorporated into their datasets for public consultation. Deposition of the report with the HER will be considered as placing the results of the project in the public domain.
- 8.7.11. The archive will be deposited with a suitable repository.

8.8. Peat monitoring and sampling

Fieldwork

- 8.8.1. The main contractor will undertake all excavation works for the creation of a working platform. Prior to undertaking the sampling of deposits identified as archaeologically significant (i.e. peat deposits identified by geotechnical investigators), the attending geoarchaeologist or suitably qualified person will familiarise themselves with the contractors' method statement and sign onto any relevant RAMS.
- 8.8.2. The attendant operative will maintain a safe distance from excavating plant during all groundworks. This should be at least 1m beyond the outer most reach of the mechanical excavators arm at full stretch.
- 8.8.3. The attendant operative will investigate upcast from the excavation. Access to sample the deposits will be agreed with the contractor and must be subject to separate specific health and safety risk assessment.
- 8.8.4. A full record will be made of the deposits present. The sediments will be described on a summary proforma according to standard methodologies based on Jones (1999) and with the aid of a Munsell soil colour chart if required (hard copy not digital printouts). This includes a description of colour, compaction, texture, sorting, structure, inclusions (including abundance, shape and material) and contacts.
- 8.8.5. The excavations will be undertaken to the depth required by the contractor.
- 8.8.6. Deposits identified as of palaeoenvironmental significance (i.e. peat deposits previously identified by geotechnical investigations) will be sampled for environmental evidence and other finds (e.g. bone, pottery etc.).
- 8.8.7. Bulk samples will be taken from selected deposits for wet sieving and floatation off site in order to recover any plant macro remains and other associated palaeoenvironmental material. A bulk sample will typically be 40 litres. However, where large deposits are encountered more than one bulk sample may be taken. Ideally this would be from the top of the peat deposit and separately from the base in order that the date of the formation might be established by radiocarbon dating and any variation in environmental conditions identified.
- 8.8.8. Samples will be labelled using waterproof marker pens and an internal label. Label will include the site code, context identifier and the depth of sample.
- 8.8.9. Every care should be taken to avoid contamination and constrain the sample locations three dimensionally in relation to the local datum points e.g. Ordnance Survey grid (OSGB36; UK onshore) or UTM (WGS84) using appropriate surveying equipment. It should also be accepted that scientific dating is only likely to be possible as a rangefinder for a baseline record of the peat. Two dates will allow either a date from each intervention or base and top from one intervention. To properly date the peat purposive geoarchaeological works including to collection of window sample boreholes would be required. Such samples would also provide a better, more constrained, sequence for palaeoenvironmental work.
- 8.8.10. A site plan including all areas of excavation and other pertinent information using client survey data.
- 8.8.11. Each sample will be given ID and stored appropriately.
- 8.8.12. A site plan including all areas of excavation and other pertinent information will be recorded 3-dimensionally.

Assessment and Reporting

- 8.8.13. A written report detailing the results of monitoring and palaeoenvironmental sampling will be produced. The report will include the following:
- a non-technical summary with Welsh translation;
 - a table of contents;
 - an introduction with acknowledgements, including a list of all those involved in the project and the location and description of the fieldwork area;
 - a statement of the project aims and objectives;
 - an account of the investigation methodology undertaken, and an assessment of its effectiveness;
 - a description of the archaeological findings;
 - plans and section drawings at appropriate scales;
 - a description of any finds and paleoenvironmental samples collected including an exposition of the methodologies employed, a statement on the presence or absence of material and an assessment of

preservation. An interpretation of the finds including reference to any unusual or important features of the assemblage will also be included. Specialist assessments of all-important groups of finds, materials and samples as necessary, including proposals for any proportionate further analysis;

- a discussion and assessment of the results with a statement of the heritage significance of any identified archaeological features/sites on a local/regional/national scale;
- interpretive maps, plans, drawings and photographs as appropriate;
- a summary of any implication of the findings for the proposed development;
- a bibliography of sources consulted; and
- a list of contents of the project archive and a statement of its location/proposed repository; and
- a copy of the HER reporting form.

8.8.14. The project archive will consist of all original records, artefacts and documentation that relates to the monitoring and palaeoenvironmental sampling. Copies of the written scheme of investigation, report and any relevant correspondence will be included.

8.8.15. An HER summary will be completed, and the final report uploaded to the HER where it will be incorporated into their datasets for public consultation. Deposition of the report with the HER will be considered as placing the results of the project in the public domain.

8.8.16. If no finds of archaeological significance are discovered as a result of the works, the resulting archive will be deposited with the HER as a recognised digital archive.

8.9. Monitoring

8.9.1. Access to the site will be afforded to the archaeological advisor, Heneb, for monitoring purposes.

8.9.2. The archaeological advisor to the LPA shall be given at least ten working days' notice of the commencement of each phase of site works.

8.10. Archive

8.10.1. The project archive will consist of all original records, artefacts, ecofacts/samples and all documentation that relates to the archaeological works. Copies of the written scheme of investigation, report and any relevant correspondence will be included.

8.10.2. The preferred method of deposition, where possible, will be digital. Archiving procedures will follow best practice guidance published in Brown's Archaeological Archives a Guide to Best Practice in Creation, Compilation, Transfer and Curation (2007), the ClfA's Standard and Guidance for the Creation, Compilation, Transfer and Deposition of Archaeological Archives (2014), the RCAHMS Guidelines for Digital Archives (2015) and The National Standard and Guidance to Best Practice for Collecting and Depositing Archaeological Archives in Wales 2017 (National Panel for Archaeological Archives in Wales 2017).

8.10.3. The final digital archive will be submitted to the National Monuments Record of Wales (NMRW) within 12 months following completion of all site works.

- 8.10.4. If necessary, an appropriate museum will be agreed as the physical archive repository for the project. An accession number will be obtained for the project, which will be used as a reference on all material to be archived. The project archive will be compiled in accordance with the guidelines published by the National Panel for Archaeological Archives in Wales (2019) and Guidance for the Submission of Data to the Heneb Historic Environment Record (HER) (2024). The physical archive will be submitted within 12 months of completion of all work on this project. Any UPD will be submitted within 3 months of Heneb's agreement to the Assessment Report and any final publication will be complete within a year of Heneb's agreement to the UPD. It is anticipated that any final publication will report the results of the project as a whole. All finds will be reported to Heneb, which will determine the ultimate destination of the material archive. Once this is determined, and within 12 months, arrangements will be made with the specified archive repository for transfer of material and title.
- 8.10.5. Final reports will be deposited with the Heneb Historic Environment Record in accordance with Heneb's *Guidance for the Submission of Data to the Heneb Historic Environment Record* (2024).⁶

8.11. Public benefit

- 8.11.1. The short duration and nature of the recording works is not suited to public participation on site while the project is ongoing.
- 8.11.2. The results of the record will be disseminated to the regional Historic Environment Record where they will be freely accessible to the public.

8.12. Human Remains

- 8.12.1. Human remains are not anticipated to be encountered during the work. If encountered human remains will not be excavated until reported to the client, curator and local police and a strategy for excavation agreed with all parties. As standard when encountered, excavation of human remains is anticipated to be undertaken during the course mitigation excavation works, prior to which a license will be gained from the Ministry of Justice in accordance with Section 25 of the 1857 Burial Act. All excavation and treatment of cremated and inhumed human remains will be undertaken in cognisance of ClfA Guidelines to the Standards for Recording Human Remains⁷; ClfA Updated Guidelines to the Standards for Recording Human Remains⁸; and all relevant BABAO Guidance including the BABAO Code of Ethics (2019) and BABAO Code of Practice (2019).

8.13. Treasure

- 8.13.1. Any recovered artefacts that are designated treasure as defined by the Treasure Act 1996 will be treated in accordance with said act. Headland Archaeology (UK) Ltd will follow the advice provided by the portable antiquities scheme for treasure and follow the Code of Practice attached to the Treasure Act 1996.
- 8.13.2. Should an artefact or artefacts classed as potential treasure be recovered during the course of the works, the law requires that it is to be reported to the local coroner within 14 days of discovery or realisation that the artefact(s) constitute potential treasure – this reporting requirement will be undertaken by Headland Archaeology (UK) Ltd, And the archaeological coordinator will be informed.
- 8.13.3. Where appropriate and agreed with the Client and LPA, the site/spoil should be scanned with a metal-detector and finds recorded and recovered as soon as practicable.
- 8.13.4. Any MD-user engaged or allowed to undertake this work should formally agree to an appropriate methodology for this work, that any finds remain the property of the landowner, and that all significant finds and their locations shall be fully recorded as part of the project.

⁶ <https://heneb.org.uk/wp-content/uploads/2025/01/Guidance-for-the-Submission-of-Data-to-Welsh-HERs-V4-EN.pdf>

⁷ Brickley and McKinley 2004

⁸ Mitchell & Brickley 2017

- 8.13.5. Any treasure will be removed to a secure store. Where removal cannot be achieved on the same working day as the discovery, suitable security measures must be taken to protect the finds from theft.
- 8.13.6. All finds and archaeological records should be removed from the site at the end of each working day as a matter of course.

8.14. Specialists

- 8.14.1. Should Headland Archaeology be commissioned to carry out the site work outlined in this WSI, it would use the following specialists where required:
- Pottery (PH) – Owain Scholma Mason (Headland Archaeology) / Frances Lynch Llewellyn (freelance)
 - Pottery (RB) – Sara Machin (Headland Archaeology)
 - Pottery (PR) – Stephanie Ratkai (freelance) / Paul Blinkhorn (freelance)
 - Metalwork and SF – Rebecca Sillwood (Headland Archaeology)
 - Lithics – Ann Bojko (Headland Archaeology)
 - CBM – Sara Machin (Headland Archaeology)
 - Industrial waste – Gerry McDonnell (freelance)
 - Plant Macrofossils - Kate Turner / Laura Bailey / Michael Wallace (Headland Archaeology)
 - Wood Charcoal - Laura Bailey (Headland Archaeology)
 - Human Remains - Angela Boyle (Freelance)
 - Faunal assessment - Alison Foster/Megan Roberts (Headland Archaeology)
 - Pollen - Tom Hill (PaleoEnvironmental Research and Consultancy Services)
 - Isotopes - Michael Wallace (Headland Archaeology)
 - Palaeo-Fauna - Bill Boismier (Headland Archaeology)
 - Diatoms - Tom Hill (PaleoEnvironmental Research and Consultancy Services)
 - Foraminifera - Alice Dowsett (Archaeology South East)
 - Molluscs - Kate Turner (Headland Archaeology)
 - Geoarchaeology - Andy Howard/Joanna Walker/Christine Milton (Headland Archaeology)
 - Waterlogged wood - Mike Bamforth (freelance)
 - Insects - Enid Allison (Canterbury Archaeological Trust)
- 8.14.2. If a separate archaeological contractor is commissioned to carry out these works, they will be required to provide details of proposed specialists via an addendum or method statement.

9. Insurance and Copyright

- 9.1.1. Headland Archaeology (UK) Ltd carries adequate insurance for the works described in this document. Certificates can be presented on request.
- 9.1.2. Copyright will be retained by the archaeological contractor as far as it applies to any and all items produced by Headland Archaeology (UK) Ltd or its subcontractors in the course of the works. Headland will licence the client, Local Planning Authority and relevant archives as necessary for use in matters relating to the project. This licence will also extend to non-commercial use.

10. References

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