LAND OFF SHEPPEY WAY, IWADE, KENT

Written Scheme of Investigation for Archaeological Mitigation

Prepared for: Middlefields Ltd

Client Ref: **12917**



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SLR Ref No: 407.12917.00001

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CONTENTS

1.0	INTRODUCTION	3
1.1	Purpose of this WSI	3
1.2	Standards	3
2.0	SITE CONTEXT	4
2.1	Site Description	4
2.2	Development Description	4
2.3	Archaeological Background	4
3.0	AIMS & OBJECTIVES	7
3.1	Aims	7
3.2	Objectives	7
3.3	Research Agenda	8
4.0	PROJECT ADMINISTRATION	10
4.1	Roles and Responsibilities	10
4.1.1	Archaeological Regulator	10
4.1.2	Archaeological Consultant	10
4.1.3	Archaeological Contractor	11
4.2	Health and Safety	11
4.3	Access Arrangements and Welfare	12
4.4	Confidentiality and Publicity	12
5.0	FIELDWORK METHODOLOGY	13
5.1	Mitigation layout & rationale	13
5.1.1	Setting out	13
5.1.2	Service scanning	13
5.1.3	Mitigation Area Excavation	13
5.1.4	Contingency area	14
5.2	Hand Excavation Strategy	14
5.2.1	Significant remains	14
5.2.2	Multiple similar features	15
5.2.3	Non-archaeological remains	15
5.2.4	Variations to the strategy	15
5.3	Archaeological Recording Strategy	15
5.4	Artefact Recovery	16



5.5	Environmental Sampling Strategy	. 16
5.6	Human Remains	. 17
5.7	Treasure	. 17
6.0	POST-EXCAVATION METHODOLOGY	. 19
6.1	General	. 19
6.2	Finds Processing and Material Archive	. 19
6.3	Paper Archive	. 19
6.4	Samples	. 19
6.5	Specialist Analyses	. 19
6.6	Reporting	. 20
6.6.1	Interim Summary Report	20
6.6.2	Assessment Report	20
6.6.3	Full Archive Report	21
6.7	Report Review	. 21
6.8	Report dissemination	. 21
6.9	Publication	. 22
6.10	Archive	. 22
6.10.1	Title	22
6.10.2	Composition	22
6.10.3	Deposition	23
6.10.4	Deposition of Digital Archive	24
6.10.5	Notification	24
6.10.6	Copyright	24
6.10.7	OASIS	24

DOCUMENT REFERENCES

PLATES

Plate 1: Locations of former trenches excavated within the Site overlying proposed SMS areas...... 5

APPENDICES

Appendix 1: Plans of Trenches 27 and 40

FIGURES

Figure 1: Site Location
Figure 2: Mitigation Areas



1.0 Introduction

SLR Consulting have been commissioned by Middlefields Ltd to prepare a Written Scheme of Investigation (WSI) setting out the methodology for a programme of archaeological mitigation. This mitigation is required to satisfy a condition attached to planning permission for a residential development at Land off Sheppey Way, Iwade, Kent (Figure 1).

These mitigation works follow the results of a programme of evaluation¹ and subsequent excavation² within the surrounding area conducted by Swale and Thames Archaeology (SWAT) between 2011 and 2016. This WSI provides the scope of and methodology for the implementation of a Strip, Map and Sample (SMS) exercise to be conducted within the mitigation areas depicted on **Figure 2.**

1.1 Purpose of this WSI

In November 2020 Swale Borough Council granted planning permission for a residential development at the Site (Application reference **19/505215/FUL**). Planning Condition 18, attached to the grant of consent for application, states that:

'No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written specification and timetable which has been submitted to and approved by the Local Planning Authority.'

This WSI formalises the scope and methodology to be adhered to in undertaking the archaeological mitigation required to satisfy planning Condition 18, as appended to grant of consent.

This WSI is required to be submitted to the Local Planning Authority for formal approval, ahead of the works described being undertaken, in order to secure partial discharge of Condition 18.

1.2 Standards

This WSI has been prepared by Lauren O'Toole, M.Sc, ACIfA, Senior Heritage Consultant, SLR Consulting. The Project Manager is Chris Morley M.Sc., MCIfA, Technical Director, SLR Consulting Ltd.

SLR Consulting is a Registered Organisation (RO) with the Chartered Institute for Archaeologists (CIfA) and a member of the Federation of Archaeological Managers and Employers (FAME).

SLR Consulting is ISO 9001 certified and operates a quality management system to help ensure all projects are managed in a professional and transparent manner.

² SWAT Archaeology, 2019. 'Archaeological Excavtions on Land Adjacent to Coleshall Farm, Iwade, Kent (2001-2016)'



¹ SWAT Archaeology, 2012. 'Land Adjacent To Coleshall Farm/ Sheppey Way/School Lane, Iwade, Kent. Archaeological Evaluation Report'

2.0 Site Context

2.1 Site Description

The Site comprises 0.3ha of arable land located to the south of the village of Iwade, Kent, within a residential area to the west of Sheppey Way. The residential area comprises a recently constructed housing estate with associated infrastructure, which borders the Site to the north and west. The Site is within the north-western half of a currently undeveloped rectangular parcel of land, however a recently consented care home is scheduled to be built within the other half to the south-east of the Site. A hedgerow borders the Site to the south-west, beyond which is an open landscape of agricultural fields.

The site is relatively flat and lies at approximately 19m above Ordnance Datum (AOD). The underlying geology is London clay formation, with further overlying superficial deposits of clay and silt. A small north-south aligned stream is located c.150m to the west of the Site, which flows northwards towards The Swale between the mainland and the Isle of Sheppey, c.2.5km to the north-east.

2.2 Development Description

The Proposed Development comprises the construction of:

- 14 bungalows and chalet bungalows (age restricted for those over the age of 55);
- 21 communal car parking spaces; and
- associated access and landscaping.

Potential truncation of any underlying archaeological remains within the Site would therefore likely result from the following construction activities:

- site investigation works, including geotechnical test-pitting, borehole sampling and archaeological trenching;
- topsoil and subsoil stripping, and any other ground preparation works, e.g. 'grubbing out', site levelling, ground reduction and/or 'cut and fill';
- excavation of building foundation trenches, road trenches, and service trenches;
- excavation of balancing ponds, swales and other site drainage; and
- any changes to the on-site water table as a result of cumulative excavations, new drainage regimes, changed land-use and increased utility of local supply etc.

The assumption would have to be that the above activities would, in combination, likely result in the truncation of any buried archaeological remains within the development footprint.

Archaeological mitigation is therefore required to preserve those remains that survive buried within the Site by proportionate record.

2.3 Archaeological Background

The Site and surrounding area comprised farmland formerly known as Coleshall Farm. This area was extensively evaluated through a programme of 129 trial trenches and subsequent targeted excavation between 2011-2016, which identified the presence of archaeological remains. These included Neolithic (4000-2500 BC) and Bronze Age (2500-800 BC) settlement and ceremonial remains, such as a potential henge monument, barrows and



cremations.³ The foci of the prehistoric ceremonial activity is located c.150m to the north-west of the Site and likely has associations with the north-south aligned watercourse running through the centre of Iwade. Other identified periods of activity within the multi-phase site included Iron Age (800 BC -AD 43) settlement and potentially funerary activity), a limited amount of Romano-British (AD 43 - 410) activity, and both early (AD 410 - 1065) and later (AD 1065 - 1539) medieval remains of settlement, agricultural and industrial nature.

The present Site is one of the last areas of Coleshall Farm to be subject to an SMS investigation. During the evaluation phase, six trenches were located within the Site (**Plate 1**). The majority of features within these trenches were interpreted as 'natural' following investigation (e.g. tree boles, bioturbation, etc.), though two areas of potential archaeological interest were identified, comprising the features within Trench 27 and Trench 40.



Plate 1: Locations of former trenches excavated within the Site (blue) overlying proposed SMS areas (yellow). Background satellite retrieved from Bing Aerial 19 March 2022

Trench 27, located within the centre of the Site, contained one pit which was dated as Early-Mid Iron Age, which was located within a large ditch. This ditch is very likely the continuation of the same feature that was identified to the north in Area 4a1 during the SMS investigation, which is variably dated to the Neolithic or Iron Age period within the sequencing plans and is interpreted as a potential hollow way within the 2019 excavation report⁴. Little justification is given for the Neolithic interpretation however, whereas the Iron Age dating is evidenced through pottery found within intervention slot [40137]. To the south-east of the Site, an SMS investigation conducted by SLR Consulting in 2019⁵ identified an additional curving north-east to south-west aligned Iron Age ditch within the north-west of that Site. Based on the trajectory of that feature as recorded in 2019, it is likely that this continues into the present Site.

³ SWAT Archaeology, 2019. 'Archaeological Excavtions on Land Adjacent to Coleshall Farm, Iwade, Kent (2001-2016)'

⁴ p.24 and Figure 9 in the above

⁵ SLR Consulting, 2020 'Coleshall Farm, Iwade, Kent. Report of an Archaeological Excavation.'

The only other trench to contain features of potential significance was Trench 40, located in the north-west of the Site. This trench contained a small number of pits and a ditch, and, whilst no dating was retrieved from these features, it is possible that they relate to the medieval archaeological remains identified to the west of the Site during the SMS investigations of 2011-2016.

To summarise, the results of the surrounding SMS investigations, as well as the lack of evidence for archaeological features within the other trenches opened within the Site during the evaluation, indicate that the Site is on the southern periphery of the area of prehistoric activity identified to the north.

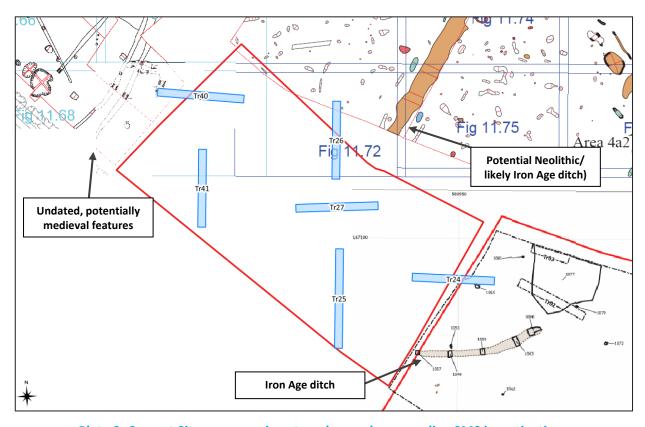


Plate 2: Current Site area, previous trenches and surrounding SMS investigations

3.0 Aims & Objectives

3.1 Aims

The programme of archaeological mitigation has been designed to:

- satisfy the requirements of Condition 18;
- satisfy the requirements of the Archaeological Regulator;
- ensure that the works are consistent with the relevant planning policy context; and
- excavate and record any identified archaeological remains to an extent proportionate to their significance, consistent with CIfA's standards and guidance.

3.2 Objectives

The objectives of the programme of mitigation are to:

- further define the nature of the archaeological remains identified during the evaluation, including identification of:
 - the extent and date of the prehistoric ditch within the centre of the Site as identified within Trench 27, as well as any satellite features that may be related to the ditch;
 - the relationship, if any, between the large central ditch and the smaller, curving ditch identified to the south-east of the Site during a 2019 phase of SMS; and
 - the extents, character, and, if possible, date of the undated remains to the north-west of the Site located within Trench 40 during the evaluation;
- identify, excavate and record any other archaeological remains that might survive buried within Area A and Area B;
- create a proportionate record of any identified archaeological remains;
- undertake a proportionate programme of post-excavation analysis, with reference to the research questions set out in section 3.3 below;
- compile a suitably detailed report, proportionate to the significance of any remains identified, presenting the results of the programme of archaeological mitigation;
- disseminate the results of the mitigation work in an appropriate format;
- compile a publicly accessible material and documentary archive, and deposit that archive with a suitable repository;
- determine what, if any, further mitigation work which might be required; and
- undertake the above in accordance with the CIfA Code of Conduct⁶ and relevant Standard and guidance documents,⁷ and all other industry guidance.



⁶ CIfA, 2014. Code of Conduct.

⁷ CIfA, 2014; Standard and guidance for archaeological excavation;

3.3 Research Agenda

The relevant research framework comprises the South East Research Framework (SERF), which is currently under review.

The evidence for prehistoric (likely Iron Age) archaeological remains within the Site currently comprises the large central ditch and potentially related scattered pits in Trench 27, which have been interpreted as representing a hollow way, or may possibly be a settlement boundary. In the absence of a research agenda for the Neolithic period within the SERF, at present, the SMS investigation may be able to contribute to the following key foci of the Bronze Age and Iron Age Research Agenda:

- Iron Age⁸
 - Settlements and Settlement Distribution:
 - 'We (also) need to pay particular attention to the diversity of evidence for settlement activity, especially in the recognition of small-scale and low-density activity, and to document the full range of settlement forms in the various periods;
 - In view of the evidence for the varying nature and density of later prehistoric activity, we need to understand how sites of all types related to their wider landscape setting; and
 - The evidence of a major phase of landscape organisation and division in the late Iron Age needs more careful examination on a suitably large scale, to understand its spatial patterning, its causes and its chronology.'
 - Architecture: The post-built round-house, often regarded as a diagnostic artefact of the later prehistoric periods in southern Britain, is in fact something of a rarity in the region
 - 'The reasons for the variability in the nature of house construction should be more carefully investigated.'
 - Agriculture:
 - 'In order to understand the timing and spread of plant and animal introductions, direct radiocarbon dating of plant material and faunal remains should be applied.'
 - Eating and Drinking:
 - 'There is great scope for the more detailed study of pottery, focusing on the types and sizes of pots in use, evidence of use-wear, and scientific analysis.
 - The major changes visible in the late Iron Age in the serving and consumption of food and drink need further examination, to document how rapid and how farreaching these changes were in society.'

The remains in the north-west of the Site as identified within Trench 40 are currently undated, however their proximity to the potentially medieval agricultural remains outside of the Site to the west and north indicates that they may possibly be related. Should the remains relate to medieval agriculture or settlement, the SMS investigation could contribute to the following key focii of the Medieval Research Agenda within the SERF:

- Medieval⁹
 - Villages and other rural settlements

⁹ South East Research Framework: Resource Assessment and Research Agenda for the Medieval Period (2012 with revisions in 2019)



⁸ South East Research Framework Resource Assessment and Research Agenda for the Middle Bronze Age to Iron Age periods (2011 with additions in 2018 and 2019)

- More understanding of the landscape of primarily dispersed rural settlement in terms of development and maintenance over space and time;
- Systematic investigation of landscapes through on an off-site analysis of a range of biological remains from waterlogged deposits and the proper retrieval of molluscs and charred plant remains including charcoal from dry deposits;
- Investigation of variant patterns and development of rural settlement types on a regional basis;
- Comparison of material culture and environmental evidence within and between rural settlements, and in comparison with other settlement types;
- Further investigation of agricultural practices (including animal husbandry) and land use through more systematic sampling and analyses than hitherto; and
- More research projects looking at small towns in particular are needed (both individual development and comparison)'
- Industry and Trade
 - 'Researches into agriculture.... (environmental and zooarchaeological analyses are particularly important in this area)'

It may be necessary/possible to address different and/or additional research questions as the programme of mitigation works progresses.



4.0 **Project Administration**

4.1 Roles and Responsibilities

4.1.1 Archaeological Regulator

The Archaeological Regulator responsible for regulating the works undertaken, on behalf of the Local Planning Authority, is:

Mr. Simon Mason,
Principle Archaeological Officer,
Heritage Conservation,
Kent County Council,
Invicta House,
County Hall,
Maidstone,
Kent,
ME14 1XX.

Simon.Mason@kent.gov.uk

03000 413415

Monitoring

All archaeological work will be monitored by the Archaeological Regulator, directly on site and/or through summary reports and telephone/email with the client or their representatives, as appropriate.

The Archaeological Regulator will be updated as the work proceeds and will be invited to visit the site by prior arrangement during the course of the fieldwork in order to review progress and hold any necessary discussions. Monitoring by the Archaeological Regulator will potentially include:

- one or more site visits to confirm the fieldwork is being undertaken in accordance with the WSI and to discuss the findings; and
- review and discussion of all reports and archives drafts before submission.

The Archaeological Regulator will be notified in advance of the date of commencement of any phase of archaeological work on site. The Archaeological Regulator will also be notified upon completion of any phase of archaeological work on site.

4.1.2 Archaeological Consultant

The Archaeological Consultant responsible for project oversight, stakeholder communication and archaeological strategy is:

Lauren O'Toole
Senior Heritage Consultant
SLR Consulting Ltd,
Hermes House,
Oxon Business Park,
Shrewsbury,
SY9 5HJ.



The Archaeological Consultant will maintain close liaison with the Archaeological Regulator, the Archaeological Contractor and other stakeholders throughout the course of the investigation.

4.1.3 Archaeological Contractor

The Archaeological Contractor will be appointed following confirmation of the construction programme and project phasing. The appointed Archaeological Contractor will provide:

- a suitable risk assessment;
- a team of suitably qualified archaeologists; and
- progress reports (verbally or by email) to the Archaeological Consultant and Regulator upon request.

All personnel deployed to work on the project will be suitably qualified to complete the tasks required. If required, details of the Project Officer, Site Supervisors and Finds Specialists can be supplied to the Archaeological Regulator and/or Local Planning Authority in writing, prior to the commencement of fieldwork.

The archaeological organisation carrying out the work will allow the site records to be inspected and examined at any reasonable time, during or after the excavation, by the Archaeological Consultant, the Client, the Archaeological Regulator, and/or any designated representative of the Local Planning Authority.

4.2 Health and Safety

Health and Safety will at all times take priority over work detail and archaeological issues. Prior to commencement of the programme of archaeological monitoring, the Archaeological Contractor will:

- provide the Archaeological Consultant and the Client with details of their public liability and professional indemnity insurance;
- submit a copy of their Health and Safety policy, compiled in accordance with national guidelines and all relevant Health and Safety legislation, to the Archaeological Consultant and the Client; and
- complete a Risk Assessment detailing any project-specific Health and Safety considerations, measures and requirements, and submit a copy to the Archaeological Consultant, the Client and, where necessary, the Principal Contractor.

Prior to preparation of the site-specific Risk Assessment by the Archaeological Contractor, either the Client or the Principal Contractor will provide the Archaeological Contractor with any and all information held in relation to existing services within the site and to known/anticipated hazardous on-site contaminants. This will include the most accurate information available on the nature and locations of those known services and contaminants.

During the course of the programme of archaeological monitoring, the Archaeological Contractor will ensure:

- the adherence of all on-site archaeological personnel engaged on the project to the relevant Health and Safety Standards and, if applicable, CDM Health and Safety rules;
- the implementation and management of the Archaeological Contractor's own Health and Safety policies;
- dissemination of the site-specific Risk Assessment to all on-site archaeological personnel engaged on the
 project, ensuring that it is reviewed and the content acknowledged, prior to the admission of any
 archaeological personnel to any working areas and prior to their undertaking any other work-related
 tasks;¹⁰

¹⁰ If required, all archaeological personnel engaged on the project will attend a Health and Safety Induction coordinated by the Principal Contractor.



- that the identity of any on-site First Aiders is made known to all archaeological personnel engaged on the project;
- that the location(s) of First Aid boxes and fire extinguishers is made known to all archaeological personnel engaged on the project;
- that all archaeological personnel engaged on the project are in possession of, and wear at all times (as required), the necessary Personal Protective Equipment (PPE), which, as a minimum, should include a hard hat, a hi-vis vest, safety gloves and site-appropriate footwear;¹¹ and
- that Covid 19 safe working practices are implemented and observed as necessary, consistent with the most up-to-date Government legislation and guidance.

All health and safety measures will be administered in accordance with the following:

- The Health and Safety Work Act (1974) and related legislation;
- Federation of Archaeological Managers and Employers Access to online advice provided by Quest;
- The Council for British Archaeology (1989). Handbook No. 6, Safety in Archaeological Fieldwork; and
- the SLR Health and Safety Handbook.

The Archaeological Contractor will leave the Site in a tidy and professional condition and will remove all materials that it has introduced onto the site, unless specifically agreed otherwise with the Principal Contractor.

4.3 Access Arrangements and Welfare

Site access is to be restricted at all times, with only authorised personnel admitted.

The Archaeological Contractor will liaise with the Archaeological Consultant in order to agree site access and egress for the team, the location(s) of compound facilities and any relevant operational detail relating to those facilities.

Site welfare facilities will be of a suitable size and standard and will be maintained in good order throughout the course of the project.

4.4 Confidentiality and Publicity

All communications regarding the archaeological works will be directed to the Archaeological Consultant and the Client.

The Archaeological Contractor will not comment upon any aspect(s) of the project to members of the public or any other parties, unless specifically authorised to do so by the Archaeological Consultant or the Client.

The Archaeological Contractor will not disseminate images or information associated with the project, either for information or publicity purposes, without the prior written consent of the Archaeological Consultant or the Client.

¹¹ Any additional PPE, such as safety glasses/goggles, ear defenders, dust-masks etc., should be issued and worn, as required.



5.0 Fieldwork Methodology

5.1 Mitigation layout & rationale

The mitigation areas are depicted in Figures 1 & 2. The layout comprises two separate areas, comprising:

- Area A: a rectangular area within the north-west of the site covering 498m²; and
- Area B: an 'L' shaped area within the centre and south-east of the Site, covering 1005m²

Area A has been located to target the remains within Trench 40, comprising a small group of undated pits and a north-west to south-east aligned ditch (**Appendix 1**).

Area B has been located to target the large, north-east to south-west aligned prehistoric ditch, as identified within Trench 27 during the evaluation and within the previous SMS investigations to the north. A contingency area of over 5m to either side of the projected trajectory of the ditch has been included to identify any related remains. The south-eastern end of the 'L' of Area B aims to target any westerly extension of the smaller Iron Age ditch as identified during the 2019 excavation to the east, including its relationship (if any) to the larger feature.

This scope of the excavation is considered proportionate (within the context of the NPPF) and sufficient to address the aims and objectives of this phase of the project. This scope has been agreed with the Archaeological Regulator, Mr Simon Mason.

5.1.1 Setting out

The mitigation areas will be set out in the locations depicted on the layout plan (Figure 2). The mitigation area locations will be identified using survey-grade Differential GPS (DGPS) equipment and marked out on the ground using either marker spray, wooden stakes and/or survey flags, ahead of excavation.

5.1.2 Service scanning

Ahead of any excavation taking place, each area, as set out, will be scanned using an industry standard Cable Avoidance Tool (CAT) and Signal Generator (Genny) system. The scan will be performed by a suitably qualified operator.

5.1.3 Mitigation Area Excavation

Each area will be machine-excavated:

- using a suitably-sized 360° mechanical excavator fitted with a toothless ditching/grading bucket;
- under the full supervision and control of a suitably qualified and experienced archaeologist; and
- to the depth of either the natural substrate or the upper-most archaeological horizon (whichever is encountered first).

Should the supervising archaeologist identify any potential archaeological remains during the excavation, this will be communicated to the machine operator. Excavation will cease while the supervising archaeologist examines the remains and/or marks-up any identified archaeological features. Once the supervising archaeologist is satisfied, machine excavation will re-commence.

Once each area has been fully machine-excavated to the satisfaction of the archaeological supervisor, any identified archaeological features/potential features will be hand-investigated, consistent with the project aims and objectives, and the provisions of section 5.2, of this WSI



Depending upon the project resourcing, requirements and on-site conditions, and only if safe to do so, investigation of parts of areas will take place while the remainder of the area is being machine-excavated ('opened'), consistent with the above provisions.

Data from the trial trenching investigations relating to the local soil profile suggests that the probable average depth of excavation of the areas will be c.0.4-0.5m below present ground level (bpgl). The upper surface of the natural substrate – superficial head/terrace deposits where present and/or the limestone/mudstone bedrock – would be anticipated at this depth.

5.1.4 Contingency area

Should remains located towards the limits of an excavation area indicate that it is likely further significant archaeological remains exist outside of the area (but within the boundary of the Site) the Archaeological Contractor should notify the Archaeological Consultant. The scope of any contingency area will then be agreed through liaison with the Archaeological Regulator.

5.2 Hand Excavation Strategy

Archaeological/potential archaeological remains will be investigated to a proportionate extent, in accordance with the project aims and objectives set out within this WSI. Provisionally, the scope of investigation will be as follows:

- discrete features, e.g. pits, will have 50% of their fill removed;
- large discrete features may be subject to a lesser level of hand-excavation and/or to machine-excavation
 if, in agreement with the Archaeological Regulator, this would be proportionate while still satisfying the
 project aims and objectives;
- linear features, e.g. ditches, will have a minimum 1m-length of their fill removed; long linear features will be sample excavated along their length with investigative excavations distributed along the exposed length of any such feature;
- where the terminus of a linear feature is revealed, this will be investigated;
- where intersections of two or more features (discrete and linear) are revealed, these will be investigated sufficient to determine the stratigraphic relationship between them;
- a representative section of each area will be cleaned by hand and the soil profile recorded;
- where features extend beyond the area section, the overlying soils will be hand cleaned and recorded in order to contextualise the features' stratigraphic relationship(s) with the overlying soil profile.

Should the above provisional scope of excavation prove insufficient to allow the nature, extent, level of preservation and significance of archaeological/potential archaeological remains to be determined, additional excavation of such remains may be required, in liaison with the Archaeological Regulator.

5.2.1 Significant remains

Where significant remains are revealed, additional detailed recording, specialist environmental sampling, and/or scientific dating may be required. The scope of and methodology for any such detailed recording would be agreed in advance with the Archaeological Regulator.



5.2.2 Multiple similar features

Should a substantive number of similar features be revealed, e.g. fence-line stake-/post-holes, their excavation will be limited, with the agreement of the Archaeological Regulator, to a proportionate representative sample sufficient to inform an understanding of their nature, extent, level of preservation and significance as a group.

5.2.3 Non-archaeological remains

Where remains are found to derive from naturally occurring events e.g. tree throws, plant holes, animal burrows, solution holes etc., a sample sufficient only to confirm that interpretation will be hand-excavated.

5.2.4 Variations to the strategy

Any variations to the above strategy would be approved in advance by the Archaeological Regulator, following on-site discussion.

5.3 Archaeological Recording Strategy

Both areas will be photographed following excavation, with written descriptions of the stratigraphic sequence (including depths bpgl) and a photograph of a representative section taken. The basic excavated dimensions should also be recorded using survey grade GPS or total station.

As a minimum, recording of each area should include:

- a pro-forma context record for each stratigraphic unit revealed¹²;
- a record of any areas identified as being devoid of archaeological remains and of any features investigated and confirmed to be of natural origin;
- a 'Harris Matrix' diagram to elucidate any complex stratigraphic sequences;
- site plans, either DGPS-recorded, or hand-drawn at a scale of 1:100, and depicting:
 - the extent of the mitigation area, tied into the Ordnance Survey National Grid and located on a 1:2,500 scale plan;
 - the extent of all stratigraphic units revealed; and
 - appropriate detail identified within stratigraphic units;
- plans of stratigraphic units at a minimum scale of 1:20, unless specific circumstances dictate an optimal scale;
- sections of stratigraphic units at an appropriate scale. Unless specific circumstances dictate an optimal scale, then this should be a minimum of 1:20. For areas of detailed, significant or complex stratigraphy the scale used should be a minimum of 1:10;¹³
- a photographic record comprising recognised industry-quality digital SLR photographs, with a minimum resolution of 10 mega-pixels and saved as high quality .jpg files.;¹⁴

¹⁴ Alongside individual archaeological contexts / stratigraphic units, general site shots will also be taken to give an overview of the site and progress of the archaeological works programme.



SLR Ref No: 407.12917.00001

April 2022

¹² Typically, this would relate to any individual 'context' identified within a single archaeological intervention. However, there may be occasions where a context evidently recurs within multiple interventions, most commonly in relation to linear features. In such instances, it may optimise the intelligibility of the information derived, and aid in its interpretation, for a single context record to be compiled.

¹³ All scale drawings will include spot heights relative to the Ordnance Datum in metres, correct to two decimal places.

- SLR Ref No: 407.12917.00001 April 2022
- numerical indices of all context records, drawings, photographs, samples and small finds, checked and cross-referenced as necessary; and
- a diary record of the progress of the archaeological work, including details of liaison and monitoring meetings, site visits, and a record of staff on site.

All of the above records will form part of the eventual project archive, to be deposited with a suitable repository upon completion of the project.

All archaeological recording will be undertaken in accordance with industry best practice, including the *Standard* and guidance for archaeological excavation (CIfA, 2014).

A site code will be generated by the Archaeological Contractor and provided to the Archaeological Regulator and the Archaeological Consultant prior to commencement of the project. This unique identifier will be clearly marked on all project documentation.

5.4 Artefact Recovery

Archaeological artefacts will be collected, stored, and processed in accordance with accepted national and regional methodologies, guidelines and standards. This includes the UKIC (United Kingdom Institute for Conservation) guidelines and the CIfA 2014 'Standard and Guidance for the collection, documentation, conservation and research of archaeological materials and Archaeological Archives: A Guide to best practice in creation, compilation, transfer and curation' (2007).

'Bulk finds' will be collected and recorded by context. 'Small finds' will be recorded three-dimensionally using DGPS or equivalent survey equipment. Each artefact within any identified artefact scatters will also be recorded three-dimensionally.

All artefacts (apart from modern finds) will be collected and retained, unless otherwise agreed in advance with the Archaeological Regulator.

Where required, artefacts will be stabilised, conserved and stored in accordance with the guidance of the United Kingdom Institute of Conservators (UKIC). If necessary, a conservator will visit the site to undertake 'first aid' conservation treatment of finds prior to their removal from site.

5.5 Environmental Sampling Strategy

Should significant waterlogged/deeply-stratified deposits be uncovered, a detailed strategy for their sampling and recording will be devised by the project palaeo-environmental specialist, in consultation with the Archaeological Regulator and the Client.

If deposits with the potential to yield palaeo-environmental or micro-artefactual data are identified, a programme of archaeological sampling will be undertaken in accordance with the following general protocol:

- samples will be recovered from cleaned surfaces, using clean tools and placed in clean containers;
- samples will be appropriately recorded and labelled, and a register of all samples recovered will be maintained; and
- the samples will be stored safely in a sufficiently secure location prior to their delivery to the appropriate specialist.

If required, bulk samples of 40 litres or 100% of <40l features will be taken for flotation and subsequent recovery of charred plant remains and associated small bones or industrial debris, with initial assessment consisting of:

- 10 litre sub-samples from waterlogged deposits for wet sieving and examination for biological remains;
- 5 litre sub-samples from dry deposits to assess their potential; and



full processing of any samples considered to warrant further assessment.

Issues to be addressed through sampling would include chronological and spatial variation within the site sequence.

Any sampling would be undertaken in accordance with Historic England's 'Geoarchaeology: Using Earth Sciences to Understand the Archaeological Record' (2015).

Should any palaeo-environmental deposits of particular interest be revealed, the Historic England Regional Science Advisor will be contacted, and their advice sought in respect of an appropriate further sampling strategy.

The relevant RSA is:

Jane Corcoran,
Historic England (London)
4th Floor
Cannon Bridge House
25 Dowgate Hill
London EC4R 2YA

jane.corcoran@HistoricEngland.org.uk 0207 973 3651

5.6 Human Remains

Should human remains be encountered, they will initially be left *in situ*, suitably covered and secured, in compliance with industry best practice. The Archaeological Contractor will notify the Archaeological Consultant, who will then inform both the client and the Archaeological Regulator.

Following this initial consultation, the removal of human remains, if required, will only take place in accordance with a Ministry of Justice exhumation license, the appropriate Environmental Health regulations and the Burial Act 1857.

The Archaeological Contractor will be responsible for applying for an exhumation license from the Ministry of Justice, and, once in receipt, for ensuring that the provisions of that license are complied with.

5.7 Treasure

The 1996 Act sets out the precious metal content required for a find to qualify as treasure; and it extends the definition of treasure to include other objects found in archaeological association with finds of treasure. Six categories of object are now classed as treasure:

- any object other than a coin which is at least 10% silver or gold by weight and more than 300 years old.
- any coins that are at least 10% silver or gold by weight and come from a single find, provided the find
 contains at least two coins with a gold or silver content of at least 10%. The coins must be at least 300
 years old at the time of discovery. Where finds consist of coins that are less than 10% gold or silver by
 weight, there must be at least 10 coins in the find and they must be at least 300 years old at the time of
 discovery for the find to be considered treasure.
- any object, of whatever, composition, that is found in the same place as, or that had previously been together with, another object that is treasure.
- any object (other than a coin), any part of which is base metal, which, when found is one of at least two base metal objects in the same find which are of prehistoric date;
- any object, (other than a coin) which is of prehistoric date, and any part of which is gold or silver.



• any object that would previously have been treasure trove but does not fall within the specific categories given above.

Intentional non-reporting can lead to imprisonment for up to three months, a fine of up to £5,000 (level 5), or both. Occupiers and landowners have the right to be informed of finds of treasure from their land and that they will be eligible for any rewards.

Protocol in the event of discovery

If any objects are recovered that are deemed to potentially qualify as treasure, the Archaeological Contractor will inform the Archaeological Consultant. The Archaeological Consultant will then inform the client and the **local** Finds Liaison Officer of the Portable Antiquities Scheme, to determine the object's status. The local Finds Liaison Officer is:

Jo Ahmet
Finds Liaison Officer - Kent
Heritage Conservation,
Kent County Council,
Invicta House,
Maidstone,
Kent,
ME14 1XX.

03000 410053 Flo@kent.gov.uk

Should any treasure be discovered, it will be removed, if possible, to a secure location; ideally, it will be deposited with the Finds Liaison Officer. Where removal from site is not practical on the same working day as the discovery, suitable security measures will be put in place to protect the find from damage, loss or theft.

Upon discovery of any treasure, the local coroner must also be informed within fourteen days of discovery, in accordance with The Treasure Act 1996 Code of Practice and its amendment. In accordance with those provisions, the local coroner is:

Ms Patricia Harding,
Senior Coroner,
Kent Mid and Medway,
Cantium House 2nd Floor,
Sandling Road,
Maidstone,
ME14 1XD.

03000 410502

kentandmedwayadmin@kent.gov.uk

The Archaeological Contractor will ensure that the *Treasure Act* regulations are complied with and that all relevant parties are kept informed. A list of finds which have been collected and which fall under the *Treasure Act* will be included within the fieldwork report.



6.0 Post-Excavation Methodology

6.1 General

The post-excavation and reporting programme will be agreed with the Archaeological Regulator and undertaken in accordance with the procedures set out in Historic England's MORPHE guidelines.¹⁵ The following sequence of post-excavation tasks will be undertaken:

- preparation of the site archive;
- preparation of a post-excavation assessment;
- post-excavation analysis consistent with the assessment;
- preparation of a grey literature report;
- preparation of a publication; and
- deposition of finds and archive with a suitable repository.

6.2 Finds Processing and Material Archive

All finds will be processed promptly following completion of the fieldwork. Retained finds will be washed, marked, bagged and recorded within a database (e.g. MS Access or GIS DBASE), and will include the location from which they were recovered in National Grid and Ordnance Datum, accurate to two decimal places.

The finds assemblage will be treated, labelled and stored in accordance with the appropriate Historic England guidance documentation, all relevant local authority guidelines and the UKIC guidelines.

The Archaeological Contractor will ensure that the processing of all assemblages recovered is also undertaken in accordance with the requirements of the Archaeological Regulator for Kent County Council.

Where appropriate, each category of find, or each material type, will be examined by a suitably qualified archaeologist or specialist, with the results of that analysis incorporated into the fieldwork report.

6.3 Paper Archive

Upon completion of the archaeological fieldwork, the archive of written, drawn and photographic records generated on site will be reviewed by a suitably experienced archaeologist. The archive will be ordered and checked to ensure that it is complete, and that the information recovered is of the required standard and is suitably intelligible ahead of its analysis. The unique site code will be included on all project documentation.

6.4 Samples

The record of samples compiled on site will be reviewed and checked against the samples collected. Samples will then be sent to the relevant specialists for processing and analysis.

6.5 Specialist Analyses

If required, specialists would provide the following in respect of the material submitted for analysis:

a statement on the presence or absence of material and an assessment of its preservation;

¹⁵ Historic England, 2015. Management of Research Projects in the Historic Environment: The MoRPHE Project Managers' Guide. Historic England (Swindon).



SLR Ref No: 407.12917.00001

April 2022

- an interpretation of the assemblage including spot-dating where relevant and reference to any unusual or important features of the assemblage;
- an assessment of the research potential of the material and recommendations for further work; and
- a programme for completing the final archive and report.

6.6 Reporting

6.6.1 Interim Summary Report

In the likely event of the investigation uncovering archaeological remains, following the conclusion of the site work an Interim Summary Report will be compiled containing:

- a plan depicting:
 - the locations of the mitigation areas (and any other contingency areas subject to field investigation); and
 - the archaeological remains identified;
- a concise body of text summarising the results of the fieldwork and the remains identified; and
- an appraisal of the significance of the identified remains.

Unless agreed otherwise with the Archaeological Regulator, the Interim Summary Report will be compiled within four weeks of completion of the fieldwork.

6.6.2 Assessment Report

Should the works identify significant archaeological remains, an Assessment Report will be compiled. Key information to be provided within the Assessment Report will be:

- a discussion of the results of the specialist analysis of any palaeo-environmental samples recovered;
- a discussion of the results of specialist analysis of the artefacts recovered, including their dating, and any
 implications for our understanding of the society, economy and/or technology of the past populations
 represented by the identified archaeological remains; and
- a discussion of any special or unusual remains, with reference made to any other relevant material recovered from the immediate Site environs.

The Assessment Report will also include the following:

- a non-technical summary;
- a site location plan;
- planning background;
- archaeological, historical and geological background;
- aims and objectives;
- methodology;
- results (including a full description, and an assessment of the nature, location, extent, date, condition, quality and significance of all archaeological features, as relevant);
- interpretation of the results within a wider context;



- SLR Ref No: 407.12917.00001 April 2022
- conclusions on the significance of the remains identified, in relation to the project aims and regional research objectives;
- conclusions on the anticipated residual potential of the Site following construction;
- publication proposals, if warranted;
- summary of archive, storage and curation;
- general and detailed plans illustrating the location(s) of the investigations, accurately plotted onto an OS base map to an appropriate scale;
- detailed scaled plans and sections of features/deposits as appropriate, including OD heights;
- a complete matrix (either site-wide, or for each area of activity identified);
- summary data tables;
- a cross-referenced index of the project archive; and
- specialist assessment and/or analysis reports, stating the range, quality and significance of the material with proposals for further detailed analysis where appropriate;
- outline recommendations for sampling strategies to be adopted during any further fieldwork phases;
- a list of the archive contents, and provision for long-term storage; and
- comments on any further work required to complete the project.

Unless agreed otherwise with the Archaeological Regulator, the Assessment Report will be compiled within six months of completion of the fieldwork.

6.6.3 Full Archive Report

Should the works identify significant archaeological remains, a further stage of analysis may be required prior to completion of the Full Archive Report. In this event, proposals for any such further analysis will be made and an updated project design and resourcing statement will be agreed with the Archaeological Regulator.

The Full Archive Report will comprise the Assessment Report updated to integrate the results of any such further specialist analyses.

6.7 Report Review

Prior to general circulation, draft copies of each report generated will be provided to the Archaeological Consultant, the Client, the Archaeological Regulator and any relevant archaeological specialists.

The Archaeological Contractor will take into account any observations on the content of the draft report made by the Archaeological Consultant, the Client and/or the Archaeological Regulator before issuing the final version.

6.8 Report dissemination

One bound and one digital version of each report (complete with illustrations) will be produced by the Archaeological Contractor within one week of the receipt of any comments issued on the draft. Digital text should be in Microsoft Word format, and illustrations should be in AutoCAD and/or PDF format.

On finalisation of the report, a digital copy in PDF/A format will be provided to the HER. The HER will also be provided with any relevant geo-referencing data, in a compatible digital format (typically .shp or .dxf).



The Archaeological Contractor will complete an Online Access to the Index of Archaeological Investigations (OASIS) form in relation to the report, to include a digital version of the report itself. The full report will include the OASIS ID number.

Once the final report on the results of the work has been published, it will be recommended to the planning authority that Condition 18 of the planning permission be discharged. If, with the agreement of the Archaeological Regulator, it can be demonstrated that sufficient resources have been made available to ensure the future completion of the reporting, it may be acceptable for discharge of the condition to be recommended prior to completion of the reporting.

6.9 Publication

If the results of the programme of archaeological mitigation are considered sufficiently significant as to warrant wider public dissemination, then a suitable format and forum will be identified in liaison with the Archaeological Regulator. As a minimum, this might include a short note in a local peer-reviewed journal.

If required, a summary report would be prepared, in the established format, suitable for inclusion in the annual round-up for the region. This would either be included in the project report or submitted directly to the Council (whichever is the sooner) by the end of the calendar year in which the work takes place.

6.10 Archive

6.10.1 Title

Where artefacts or ecofacts have been recovered during the investigation the owner will be contacted to arrange legal transfer of title to the receiving repository (to be confirmed). The transfer of title would be effected by a standard letter supplied to the landowner for signature.

6.10.2 Composition

The compilation of an integrated and ordered project archive will be undertaken by the Archaeological Contractor in accordance with the provisions of the following:

- Historic England's MAP2 and MoRPHE guidance;
- United Kingdom Institute for Conservation (Archaeology Section) (UKIC) 1990 Guidelines for the Preparation of Excavation Archives for Long-Term Storage;
- Society of Museum Archaeologists (SMA) 1995 Towards An Accessible Archive;
- Archaeological Archives Forum (AAF) 2007 (revised 2011) Archaeological Archives: A guide to best practice in creation, compilation, transfer and curation;
- Museum and Galleries Commission (MGC) 1992 Standards in the Museum Care of Archaeological Collections;
- the requirements of the chosen repository; and
- this WSI.

The archive will include:

- recovered artefacts and significant samples (material archive);
- all written, drawn, photographic and other records generated during the fieldwork (site archive); and



• all digital data, including that which is digital in origin, ¹⁶ and any digital copies made of the primary site records, ¹⁷ including images.

In accordance with section 4 of *Creation of Archives*, and in consultation with the Archaeological Regulator, a rigorous process of selection and discard would be followed so that only those elements considered of significance for potential future study would be retained.

Bulk items such as ceramic building materials, stonework, large quantities of undiagnostic pottery, and material that is difficult/costly to conserve, such as worked wood, may be selected for discard once appropriate recording and analysis has been undertaken, either on site or in the laboratory at the post-excavation stage. Detailed discard proposals would be agreed by the Archaeological Regulator prior to implementation.

Once prepared, the Archaeological Contractor will store the archive in a suitable and secure location prior to its deposition. The archive will be offered to a suitable repository for deposition within six months of the completion of the fieldwork, with the agreement of the client.

6.10.3 Deposition

The hardcopy archive will be deposited for long-term curation with a recognised, accredited or trusted repository. The destination museum has yet to be confirmed.

In depositing the archive, the Archaeological Contractor will:

- contact the preferred repository at an early stage, in order to obtain their acceptance of the archive for long-term storage and curation;
- be responsible for identifying and adhering to any specific policies or requirements provided the repository in respect of archive preparation and submission;
- contact the agreed repository to obtain a reference number, which will be stated within the assessment report;
- endeavour to obtain a written agreement from the landowner to transfer title to all items in the material archive to the repository (on their behalf);¹⁸ and
- grant license to copyright for documentary material (both physical and digital) to the client, for transfer to the relevant repository.

In the event that the fieldwork does not reveal deposits of archaeological interest and produces little or no artefactual material, there would be no requirement for an archive to be deposited. In these circumstances, the Archaeological Contractor will obtain written agreement from the Archaeological Regulator that this is the case. If applicable, Condition 18 might then be considered discharged upon receipt of the assessment report and completion of an OASIS entry.

¹⁸ If ownership of any or all of the artefactual material is to be retained by the landowner, then provision must be made for its time-limited retention by the Archaeological Contractor to facilitate its full analysis and specialist recording.



¹⁶ Including email correspondence, images, survey data and other site data collected through digital/electronic means.

¹⁷Including relevant drawn and written data created during fieldwork (context sheets, sample sheets, finds records, drawings/plans/sections/sketches, all indices, earthworks surveys, and any notes that contribute to the interpretation and understanding of the site and its recording) and relevant records/data produced as part of the post-excavation assessment or analysis etc.

6.10.4 Deposition of Digital Archive

Currently, the only suitable repository for digital archives is the Archaeology Data Service (ADS). If appropriate, the digital archive will therefore be compiled in accordance with ADS standards and requirements.¹⁹

Should the archive repository confirm that they do not require the hardcopy archive, then once the digital archive has been transferred to the ADS, the Archaeological Contractor may retain, disperse or dispose of the primary hardcopy items. This may entail physical destruction of the primary record.

6.10.5 Notification

The Archaeological Contractor shall promptly notify the Archaeological Regulator when the archive of records and finds has been deposited with the appropriate repository.

6.10.6 Copyright

The Archaeological Contractor will assign copyright in all reports, documentation and images generated during the project to the client. The Archaeological Contractor will retain the right to be identified as the author/originator of the material. It is the responsibility of the Archaeological Contractor to obtain such rights from any sub-contracted specialists.

The Archaeological Contractor may apply in writing to use or disseminate any part of the project archive, documentation or images, and such permission will not be unreasonably withheld.

The client will own all Intellectual Property Rights to photographs and documentation prepared for this project by or on behalf of the Archaeological Contractor.

6.10.7 OASIS

An OASIS entry for the project will be completed within 3 months of the completion of the archive. The OASIS entry will host PDF versions of the reports generated.

¹⁹



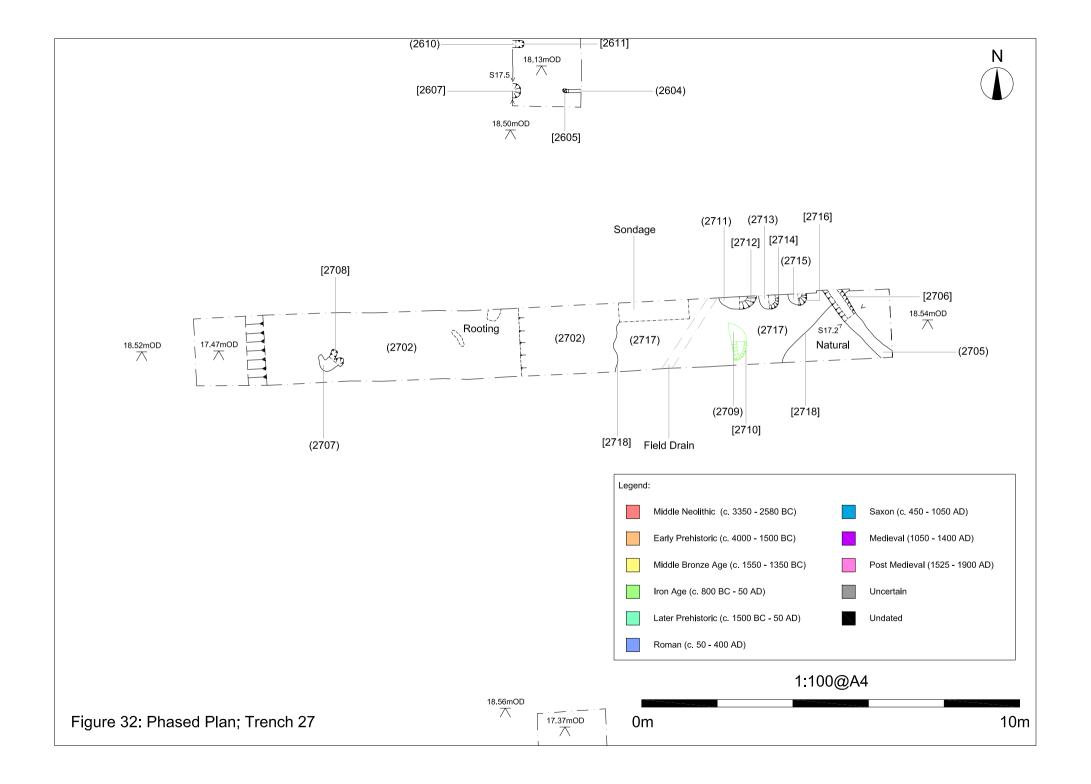


APPENDIX 1 PLANS OF TRENCHES 27 AND 40

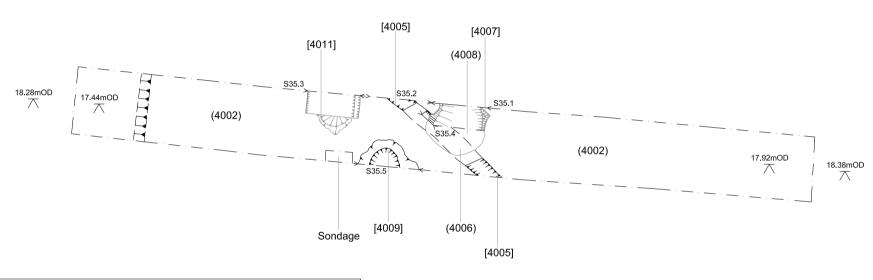
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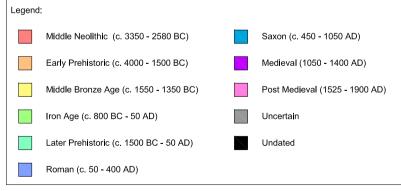
April 2022











1:100@A4

Figure 39: Phased Plan; Trench 40

0m

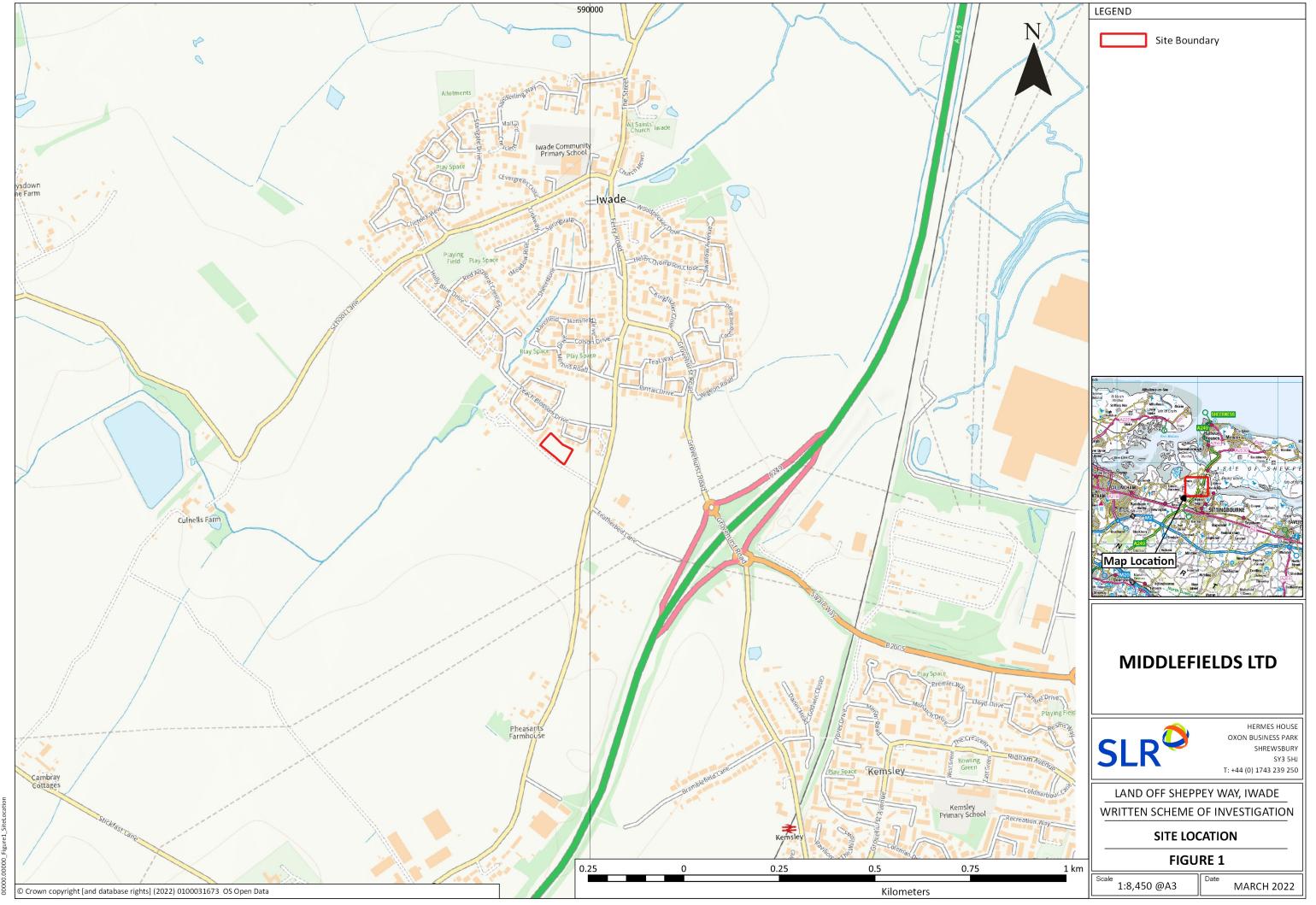
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FIGURES

April 2022

SLR Ref No: 407.12917.00001







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