

Newport City Council

Supplementary Planning Guidance

Archaeology & Archaeologically Sensitive Areas



Adopted August 2015

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Planning Policy Wales (Edition 7, July 2014)

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Welsh Office Circular 60/96: *Planning and the Historic Environment: Archaeology*

Legislation:

Ancient Monuments and Archaeological Areas Act 1979

Town and Country Planning Act 1990

1. Introduction

- 1.1 Newport City Council has a rich and diverse archaeological heritage with in excess of 1,400 archaeological sites within its administrative area. This Supplementary Planning Guidance (SPG) seeks to protect the archaeological heritage and its setting by advising how development proposals can best take account of archaeological issues. The presence of archeological remains does not necessarily preclude development.
- 1.2 Where a concentration of archaeological remains has been identified or the presence of archeological remains is suspected then those areas may be included in an Archaeologically Sensitive Area (ASA). However, it should be noted that archaeological sites that could have an impact on planning decisions also exist outside these defined areas. This SPG explains:
- The ASAs and how they were identified;
 - How early **consultation and archaeological** evaluation may assist in an understanding of the archaeological significance of the area when development proposals are submitted for planning permission;
 - How procedures for consultation and evaluation **will** be implemented;
 - What archaeological work may be required to allow permission to be granted or to be implemented;
 - The effect and importance of **planning conditions** which may be attached to a planning permission;
 - How to **discharge** any planning conditions.
- 1.3 Archaeological remains are an important finite source of information about the past. Their investigation and, where appropriate, preservation is important in its own right and can provide an invaluable educational and tourism resource. It is important to preserve this resource and to ensure that remains that maybe present are not destroyed through ignorance of their location and importance or through careless development.
- 1.4 Glamorgan Gwent Archaeology Trust (GGAT) Curatorial is the Council's archaeological advisors. It provides advice on the care of all archaeological sites in Newport. Its officers have considerable experience of the archaeology of Newport and also in assisting in the design of suitable foundations and other engineering solutions for development on sites where archaeological material is present.
- 1.5 Cadw, an executive agency, is the historic environment service of the Welsh Government and undertakes the Welsh Government's

responsibilities for scheduling and administering the protection of ancient monuments. There are currently 68 Scheduled Ancient Monuments within Newport City Council's administrative area, identified in Appendix A. Should the site under consideration involve a scheduled ancient monument an application for *Scheduled Monument Consent* will be required, as planning permission alone **can not** authorise works to a scheduled monument.

- 1.6 It is an offence, punishable by fine, to do works to a scheduled monument without first obtaining scheduled monument consent. It is also an offence to damage or destroy a scheduled monument. The maximum penalty for this is an unlimited fine and/or a period of two years' imprisonment.

2. Policy Context

2.1 Planning Policy Wales

2.1.1 Planning Policy Wales (Edition 7, July 2014) states that:

6.1.1 It is important that the historic environment encompassing archaeology and ancient monuments, listed buildings, conservation areas and historic parks, gardens and landscapes – is protected. The Welsh Government’s objectives in this field are to:

.....• protect archaeological remains, which are a finite and non-renewable resource, part of the historical and cultural identity of Wales, and valuable both for their own sake and for their role in education, leisure and the economy, particularly tourism;.....

2.2 Welsh Office Circular 60/96: ‘Planning and the Historic Environment: Archaeology’

2.2.1 This Circular provides in depth policy guidance on the handling of archaeological matters in the planning process. Developers are required to discuss their preliminary plans with local planning authorities at an early stage and to undertake, as part of their research into the development potential of a site, an initial appraisal of the site to establish whether it is known to, or likely to contain archaeological remains.

2.2.2 Planning Policy Wales states that:

*Where nationally important **archaeological remains**, whether scheduled or not, and their settings are likely to be affected by proposed development, there should be a presumption in favour of their physical preservation in situ. In cases involving lesser archaeological remains, local planning authorities will need to weigh the relative importance of archaeology against other factors, including the need for the proposed development.*

2.3 Welsh Office Circular 61/96 – Planning And The Historic Environment: Historic Buildings And Conservation Areas

2.3.1 Circular 61/96 refers the reader to Circular 60/96 for additional guidance on archaeological matters. Paragraph 10 of circular 61/96 states:

Some historic buildings are scheduled ancient monuments and many which are not scheduled are either of intrinsic archaeological interest or stand on ground which contains archaeological remains. It is important in such cases that there should be appropriate assessment of the archaeological implications of development proposals before applications are determined and that, where permission is to be granted, authorities consider whether adequate arrangements have been made for recording remains that would be lost in the course of works to which the permission will relate.

2.4 Newport Local Development Plan 2011-2026

- 2.4.1 The Local Development Plan acknowledges that archaeological features throughout the urban and rural areas play a vital role in the quality of that environment. There will be a presumption in favour of the retention, safeguarding, conservation and enhancement of ancient monuments and other sites, recognised by the Council as being of archaeological importance, and the settings of such sites, buildings and areas.
- 2.4.2 The relevant policies in the LDP associated with the protection of archaeological remains are:
- Policy SP9 identifies the need for conservation of the natural, historic and built environment
 - Policy CE6 identifies the requirement to undertake an Archaeological Impact Assessment within Archaeologically Sensitive Areas and within other areas of recognised archaeological interest, such as Scheduled Ancient Monuments.

3. Planning for Archaeology: Archaeologically Sensitive Areas

3.1 Introduction

- 3.1.1 Scheduled Ancient Monuments represent only a small proportion of the total number of known archaeological sites in Newport. There are many others, of varying importance, recorded in the Historic Environment Record (HER). Absence of a record on the HER does not mean that no archaeological interest exists and GGAT Curatorial will continue to monitor planning applications and update the HER where appropriate.
- 3.1.2 The designation as an Archaeologically Sensitive Area (ASA) highlights the archaeological significance of these areas and the need for potential developers to seek professional archaeological advice to ascertain the archaeological significance of a site. For details of the ASA locations see Figure 1 below.
- 3.1.3 The designation of an ASA is not intended to introduce new policies or restrictions to development but to indicate to developers, areas where it is likely that the effect of the development on the archaeological resource may become an issue during the determination of a planning application. Identification enables the LPA and its advisor, GGAT Curatorial, to identify the information needed to establish the importance of the archaeological resource and the effect of the proposed development.
- 3.1.4 If a development site is in an ASA then developers should initiate early discussions with the LPA and GGAT regarding the possible impact of the development on the archaeological resource and how that effect might be mitigated. The ASAs do not identify the only areas where archaeology will be a factor in the determination of planning applications but show the most likely areas where this could occur.
- 3.1.5 Areas outside of a designated ASA should not be interpreted to mean that any archaeological features are of any less importance than those inside the ASAs.

3.2 Defining Archaeologically Sensitive Areas

- 3.2.1 The ASA's have been designated following appraisal by GGAT Curatorial to clearly define the most likely areas in which archaeology may become a component in the determination of planning applications and give potential developers early indications of such factors. Their boundaries have been located in the main along modern features and they should not be taken as an absolute edge of the archaeological sites which could extend further.

3.2.2 It is impossible to determine in a document of this type which developments will have an impact on the archaeological resource. It is strongly recommended that at an early stage prospective developers discuss their proposals with GGAT Curatorial to ascertain whether or not their development is likely to have an impact on the archaeological resource.

3.3 The Archaeologically Sensitive Areas of Newport

3.3.1 GGAT Curatorial has identified four Archaeologically Sensitive Areas in Newport, see Figure 1. The ASA's are:

1. Caerleon;
2. The Levels;
3. Lower Machen;
4. Newport (Mediaeval Town).

4. Dealing with a Scheduled Ancient Monument

4.1.1 The protection of ancient monuments and other archaeological remains is required by legislation and the planning policy framework. In Wales, nationally important archaeological sites are currently given statutory protection as scheduled ancient monuments (*See Figure 1.*) under the *Ancient Monuments and Archaeological Areas Act 1979*.

4.1.2 Section 61(7) of the Ancient Monuments and Archaeological Area Act 1979 defines a monument as:

(a) any building, structure or work, whether above or below the surface of the land, and any cave or excavation;

(b) any site comprising the remains of any such building, structure or work or of any cave or excavation; and

(c) any site comprising, or comprising the remains of, any vehicle, vessel, aircraft or other movable structure or part thereof which neither constitutes nor forms part of any work which is a monument within paragraph (a) above;

and any machinery attached to a monument shall be regarded as part of the monument if it could not be detached without being dismantled.

4.1.3 Paragraph 10 of Welsh Office Circular 60/96 states that a monument and its setting, irrespective of it being scheduled or not, is a *material consideration* in determining an application for planning permission (PPW 6.5.1). Reference should be made to Annex 3 of the Circular, when determining what constitutes an important site. This is the criteria used by the Welsh Government (via Cadw) when considering scheduling monuments and includes: period; rarity; documentation; group value; survival/condition; fragility/vulnerability; diversity; and potential.

4.1.4 Responsibility for the care and maintenance of monuments rests with the owner. Where development proposals are likely to affect the site or setting of a Scheduled Ancient Monument, Scheduled Monument Consent should be sought from Cadw prior to the submission of a planning application to try and avoid unnecessary delays.



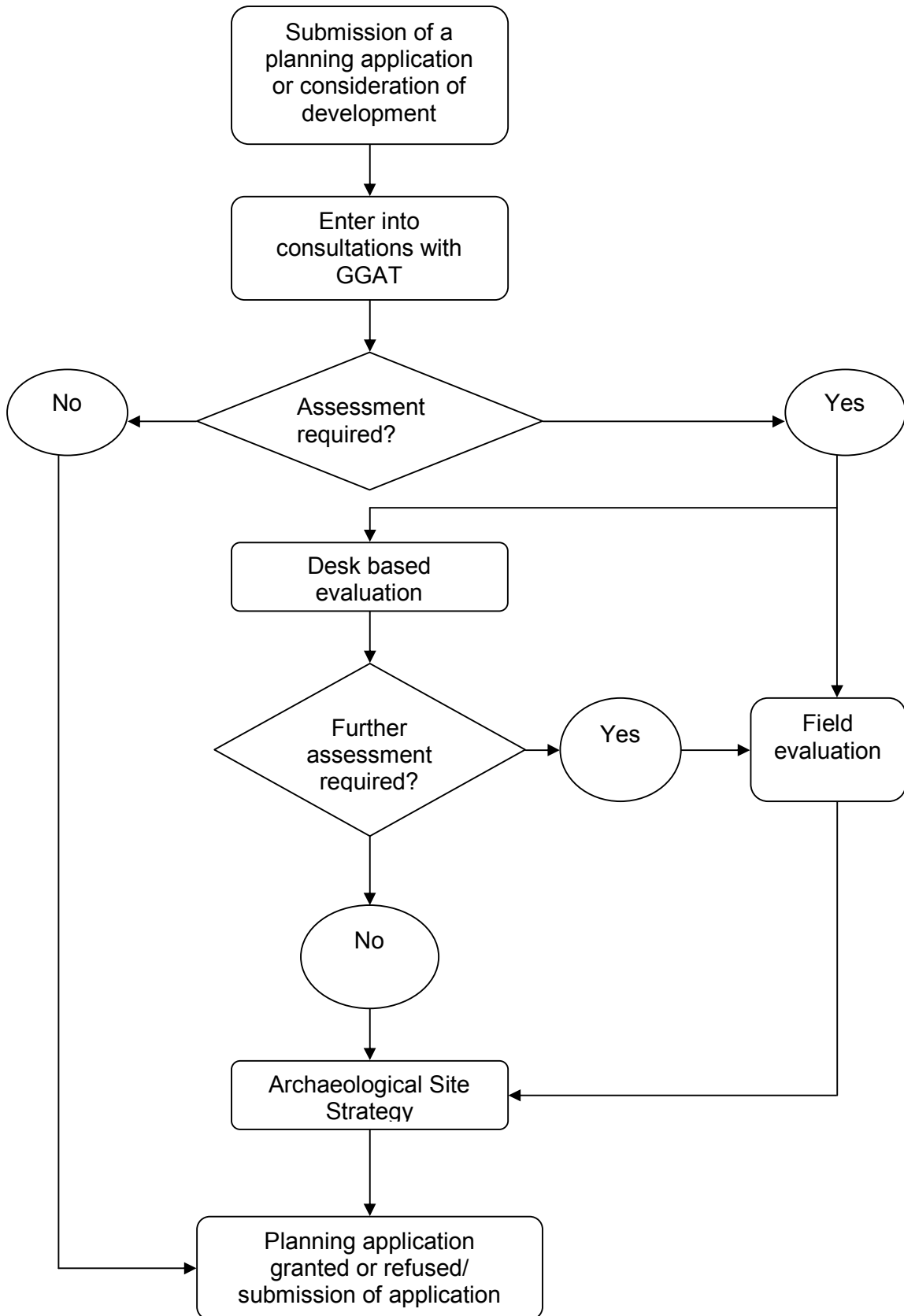
Figure 2: Gwern y Cleppa Burial Chamber, Coedkernew, Newport. (ST27638505): Scheduled ancient monument.

5. Development Management in Newport

5.1 Summary of the Application Submission Process (See Figure 3)

- 5.1.1 In areas that are designated as ASAs or where archaeological material is suspected early consultation with GGAT, who will make an assessment of the site, is recommended. Depending on the results of this assessment a desk based or field evaluation may also be required. Any archaeological implications can then be identified and the appropriate mitigatory strategy considered, if necessary, early within the consideration of the planning application.
- 5.1.2 The *in situ* preservation of important archaeological remains and their setting will be sought, but this will depend on the merits of both the application under consideration, including other material considerations, and the importance of the archaeology. Planning permission can be refused in exceptional circumstances if the archaeology is deemed particularly meritorious.
- 5.1.3 Should the archaeological remains or their setting not be deemed to be of such importance, for the planning application to be refused, developers will be required to provide for the remains to be recorded either by excavation or a watching brief. The implementation of the archaeological works will be secured by condition or occasionally by legal agreement.
- 5.1.4 A more in-depth breakdown follows in subsequent paragraphs.

Figure 3: Summary of the planning policy requirements in Wales with regards to archaeological remains and proposed development. (See Appendix D for comprehensive flowchart)



5.2 Early Consultation and the submission of an application

- 5.2.1 Where archaeological remains are known to exist, or where there is a likelihood of remains existing, developers will be required to provide further information on the archaeology and the impact of the proposed development on it prior to determination of a planning application (Policy CE7 and Circular 60/96 Paragraph 14).
- 5.2.2 To gather this additional information may require the applicant to commission a suitably qualified archaeologist to prepare an archaeological assessment of the site and/or to carry out an archaeological evaluation of the area (see Appendix B for more details). This will assist in the determination of whether an archaeological interest exists and, if so, whether the remains merit preservation *in situ* or “by record” (i.e. excavation) prior to development.
- 5.2.3 When consultations have not taken place prior to the submission of a planning application Newport City Council will consult GGAT, where a potential archaeological impact is suspected the developer will be required to complete an appraisal of the likely impact of the proposed development on the archaeological resource (Circular 60/96 paragraph 15).

5.3 Archaeological Assessment

- 5.3.1 Site assessment may be thought to be an appropriate avenue after consultation has taken place with GGAT or an initial appraisal has taken place. A desk-based evaluation may be sufficient as field work is not a prerequisite and then if required an appropriate site strategy should be determined. Any assessment must be undertaken by a professionally qualified archaeologist.

5.4 Field Evaluation

- 5.4.1 Field evaluations are to be conducted by a professionally qualified archaeologist or organisation, and Circular 60/96 makes reference to the IFA, now the Chartered Institute of Archaeologists. Newport City Council will request that the potential developer arrange for a field evaluation (Circular 60/96 paragraph 13) when early consultations indicate that this is an appropriate course of action.
- 5.4.2 A field evaluation should be undertaken to a brief provided by GGAT Curatorial and should not take place until a detailed specification prepared by the archaeological contractor undertaking the work has been

approved by GGAT Curatorial. The brief will outline the required works and these may include one or more of the following: earthwork survey, geophysical survey, field walking and trial excavation. The first three of these operations are most likely to be carried out in advance of the trial excavation in order to determine the exact location of the trial areas that will be investigated.

5.5 Inadequate Information Supplied

- 5.5.1 The resultant information from the forms of assessment/appraisal should then be submitted as part of the application (Circular 60/96 paragraph 14 & PPW Section 6.5.2).
- 5.5.2 *Regulation 4* of the *Town and Country Planning (Applications) Regulations 1988* (SI 1812), allows the Council to require the submission of necessary details to allow a planning application to be determined. If the necessary information is not provided then permission can be refused. This would include failure to provide adequate archaeological information.
- 5.5.3 It is critical that there is adequate information for the Authority to make the appropriate decision and if this is not the case GGAT will recommend refusal or that a decision be deferred, an approach upheld by the Planning Inspectorate in appeals against non-determination.

5.6 Planning Decisions

- 5.6.1 Prior to implementing a planning permission the developer must prove that suitable provision has been made for the archaeological investigation of the site, its recording and publication of the findings as necessary. The Authority will provide a brief, via GGAT, that developers are to follow prior to commencement of any permission (PPW Section 6.5.3).

5.7 What happens if archaeological remains are found on my development site?

- 5.7.1 The preference for preserving nationally important archaeological material *in situ* is stressed (Circular 60/96 paragraph 17 & PPW Section 6.5.1) and as such the Authority will seek this outcome. Therefore if an archaeological site is discovered in an application area the impact of the development upon it will be a material consideration in the planning process. The preservation of material *in situ* does not necessarily

preclude development as such deposits may be sealed or incorporated in to the design of a structure, as a mitigatory strategy. If a developer will not accommodate important remains within their plans the Authority will have to consider refusing the proposal, but this would depend on the merits of the case, taking account of the importance of the remains and other material considerations. In exceptional circumstances, this may mean that the proposed development is inappropriate on a site and permission will be refused.

5.7.2 However, this rarely happens, as there are methods of designing developments that will preserve archaeological sites *in situ*. On larger development sites it is usual for public open space to be required and this can be designed to coincide with the archaeological features. If there are no upstanding earthworks it may be possible to position lightweight features, such as car parks, or utilise rafted foundations on top of the archaeological feature(s). In such circumstances it is therefore likely that the applicant will be required to provide more details on mitigation measures that are proposed to be used in order to protect the archaeological resource and reduce the impact of the development on it prior to the final determination of the application.

5.7.3 Elsewhere, detailed proposals may need to pay regard to the findings of the evaluation and mitigate the effects of development. Where the remains or their setting are not deemed to be of such importance for the planning application to be refused, developers may be required to provide for the remains to be excavated and/or recorded prior to development commencing. Any excavation that takes place will produce written, drawn and photographic records, and can result in finds and environmental samples. These will need to be processed (including appropriate analysis) and archived, resulting in the production of a site report. Any archaeological investigation is incomplete until the site report is published and made available to the public, usually through the HER. These matters will be agreed, with the Council and GGAT, prior to the commencement of any development.

5.8 Preservation by Record

5.8.1 If the Authority believes, as a result of either a desk-based or field evaluation, that preservation *in situ*, for a site is inappropriate, that is the material present could be deemed of lesser importance for example, under the prevailing conditions then the development could proceed, though it may be subject to a number of conditions if a voluntary agreement has not been entered in to.

- 5.8.2 Where archaeological remains are deemed to be of lesser importance the Authority shall have to consider the merits of the archaeology against other pertinent factors irrespective of the value of the archaeology. The *need* for the proposed development and any other pertinent factors are to be considered before making such a decision (Circular 60/96 paragraph 18 & PPW Section 6.5.1).
- 5.8.3 All the resultant archaeological information should be deposited with the appropriate HER for public use, which is in accordance with Welsh Office Circular 60/96 (Paragraph 18) that requires the publication of results. To ensure this all discussions with the developer/applicant must include an agreement to place copies with the HER.

5.9 Ensuring the Provision of Archaeological Investigations

- 5.9.1 The archaeological investigation should be completed before development takes place (Circular 60/96 paragraph 20 & PPW 6.5.3). A Section 106 *planning obligation* may be utilised to formalise any voluntary agreements, thus making them legally binding, made between the applicant and the Authority (Circular 60/96 paragraph 20-21). These agreements can cover funding; means of investigation, i.e. excavation; and the subsequent recording of the site in question.

5.10 Planning Permission and Imposed Conditions

- 5.10.1 If planning permission is granted for development in an area where archaeological features are known to exist it is likely that conditions will be attached to the permission in order to ensure that the archaeological resource is protected or properly investigated.
- 5.10.2 The imposition of pre-conditions (Circular 60/96 paragraph 23 & PPW Section 6.5.4), including conditions that prevent development commencing prior to certain archaeological works taking place, such as an excavation are used to ensure necessary works **are carried out**. An example of such a condition is cited in Circular 60/96, paragraph 23, which states:

'No development shall take place within the area indicated [this would be the area of archaeological interest] 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 scheme of investigation which has been submitted by the applicant and approved in writing by the local planning authority' (Welsh Office, 1996).

5.10.3 Further to this the Authority could condition a watching brief.

5.11 Programmes of Archaeological Investigation

5.11.1 An archaeological investigation condition can cover many different types of archaeological work, from a watching brief to full excavation. In normal circumstances GGAT Curatorial will outline the programme of investigation that they envisage being carried out in their letter recommending that the condition is attached to the planning permission. In general the applicant should engage an archaeologist to inspect their proposed development plans and devise a suitable programme of investigation. GGAT Curatorial will not prepare the programme of investigation but are willing to discuss its contents with the appointed archaeologist in order to ensure that a suitable programme is proposed. In some case this programme could consist of a watching brief but also outline contingency arrangements in case complex archaeology is discovered.

5.12 How do I discharge the planning conditions?

5.12.1 It requires, in many instances, the formal submission of details to the Local Authority. Recent case law (Henry Boot Homes v. Bassetlaw DC) has ruled that in most cases development, which commences prior to the discharge of relevant planning conditions is not lawful. Any development carried out in breach of condition **constitutes a breach of planning control**. As such, any enquiry received as a result of a local search relating to the property will show the development is unauthorised.

5.12.2 A condition requiring a watching brief to be undertaken is partly met when the applicant informs the Council of the name of their appointed archaeologist. It is fully discharged once the watching brief has been carried out and a report on the work is submitted.

5.12.3 Discharging a condition requiring a programme of archaeological investigation is more complex. In the first instance the programme of archaeological work designed by the applicant's archaeologist needs to be submitted to the Council. Once this has been approved the on-site works outlined in the document will need to be undertaken. On completion of these works, either a final report can be produced or, in the case of excavations, a post-excavation assessment will be produced. In the latter case the works outlined in the assessment will need to be undertaken and then the final report produced. This process can take

some time and it is recommended that the applicant should submit information at the end of each of the above stages to the Council (and through them GGAT Curatorial) in order for a partial discharge of condition notice to be issued. Only when the final report is submitted and if deemed necessary the publication of the results in a suitable medium has been agreed will full discharge of the condition be possible.

- 5.12.4 As such the discharge of conditions should be addressed **early** in the development process and serious consequences including formal enforcement action by the Council can result from undertaking work in breach of condition.

5.13 Enforcement of Breaches of Condition

- 5.13.1 The Council has powers under Section 187A of the Town & Country Planning Act 1990 to issue a Breach of Condition Notice requiring steps to be taken to remedy this breach of planning control. Failure to comply with the requirements of a Breach of Condition Notice is a criminal offence, against which prosecution proceedings may be taken at the Magistrates' Court. The maximum penalty for this offence is currently a fine of £10,000 or, upon conviction on indictment, an unlimited fine

5.14 Archaeological Material Discovered Once Development has Commenced

- 5.14.1 If development is taking place and archaeological remains become apparent the Welsh Government reserves the right to schedule them if they are deemed of national importance (PPW Section 6.5.5 & Circular 60/96 paragraph 24). It is worth noting that this is an extremely unlikely eventuality should the procedures outlined above be followed.
- 5.14.2 The assessment of the relative importance of the archaeology is to be carried out by the Welsh Government. Either the Welsh Government or the Authority can revoke the relevant planning permission if it is felt that this is a suitable course of action. Though should the monument be scheduled and the developer wish to continue with works *Scheduled Monument Consent* would be required anyway, as planning permission alone can not authorise works to a scheduled monument.

APPENDIX A: NEWPORT CITY COUNCIL CONTACTS

Enquiries

If you have general enquiries regarding this document or policies relating to the built heritage of Newport, please contact the Planning Policy Team.

Planning Policy
Newport City Council
Civic Centre
Newport
South Wales
NP20 4UR

Tel: (01633) 656656

APPENDIX B: OTHER CONTACTS

The Development Control Section, Glamorgan-Gwent Archaeological Trust Ltd.
Heathfield House, Heathfield Swansea SA1 6EL.

Tel: 01792 655208

Fax: 01792 474469

email: planning@ggat.org.uk

website: www.ggat.org.uk

Chartered Institute for Archaeologists, Miller Building, University of Reading,
Reading, RG6 6AB.

Tel: 0118 378 6446

website: www.archaeologists.net

CADW, Plas Carew, Unit 5/7 Cefn Coed, Parc Nantgarw, Cardiff. CF15 7QQ.

Tel: 01443 336000

Fax: 01443 336001

email: Cadw@Wales.gsi.gov.uk.

Website: www.cadw.wales.gov.uk

How Do I Find An Archaeologist?

There are numerous archaeological organisations in the UK who have experience in undertaking work in relation to the planning process. As in many professions the service that individual archaeological organisations can provide will vary dependent on their size and experience. A List of Registered Archaeological Organisations that are members of the Chartered Institute of Archaeologists is available from the Institute (<http://www.archaeologists.net/modules/icontent/index.php?page=196>).

APPENDIX C: GLOSSARY

Appraisal / assessment: A brief review of the planning applications and checking the HER etc to assess whether proposed development may possibly impact on archaeological material.

context: An element of an excavation, which can include a feature, a stratigraphic layer or even part of a structure.

desk-based assessment (DBA): An assessment made of the identified and potential archaeological material in a particular area; made by utilising sources such as the HER, aerial photographs and documents. The resultant report makes an assessment of the potential archaeological resource.

field evaluation: Carried out by both invasive and non invasive techniques in the field to ascertain the presence, or otherwise, of archaeological material. Non invasive techniques, such as geophysical survey, may be employed over the entire site, which then allows for the precise placing of trial trenches. The procedure results in a report and possibly an archive.

field walking: When a field has been recently ploughed archaeological material can be recovered from the surface. Archaeological field walking requires a systematic search of the surface, this can be augmented by using metal detectors, with the location of all material being recorded and plotted prior to their collection.

geophysical survey: Involves the use of a number of scientific techniques to detect the presence of archaeological material. The main geophysical survey types are: Magnetic Susceptibility; Magnetometer Surveys; Earth Resistance Surveys; Caesium Vapour Gradiometers; Ground Penetrating Radar; Pseudosection and Timeslices; and Electromagnetic Prospection

Historic Environment Record (HER): The successor to the SMR which has a broader remit than the change in title indicates.

in situ: Something in its original position.

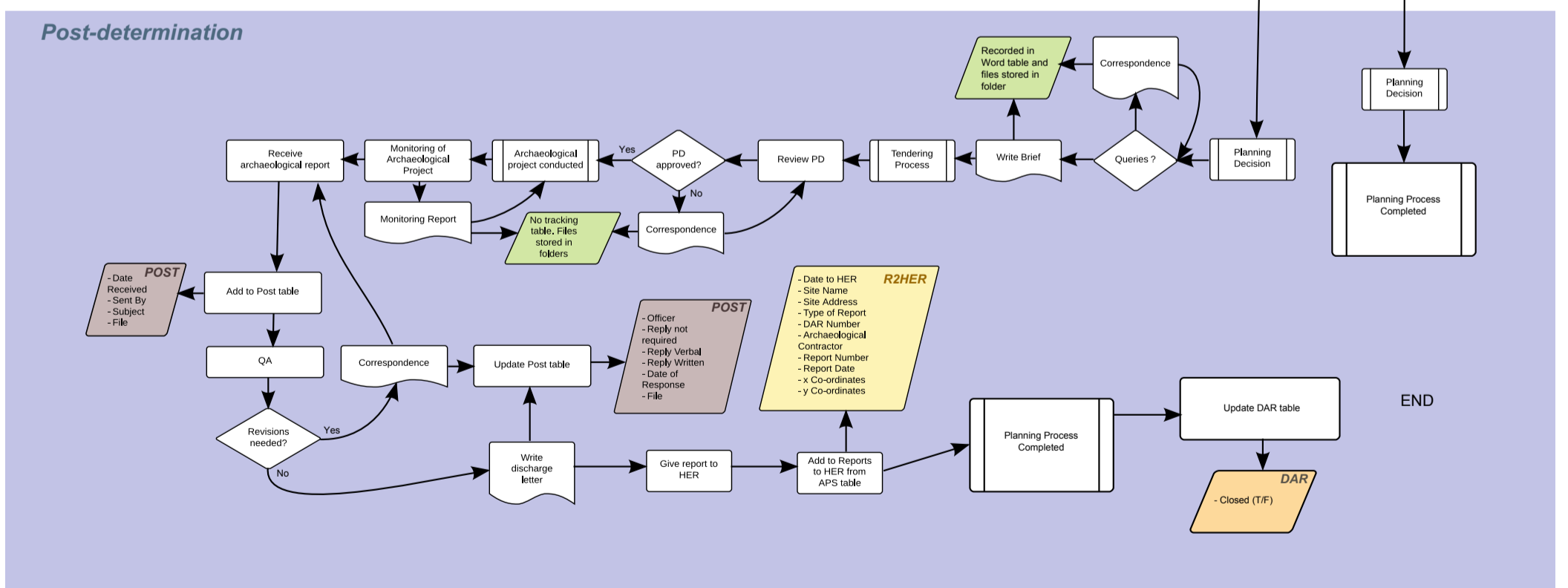
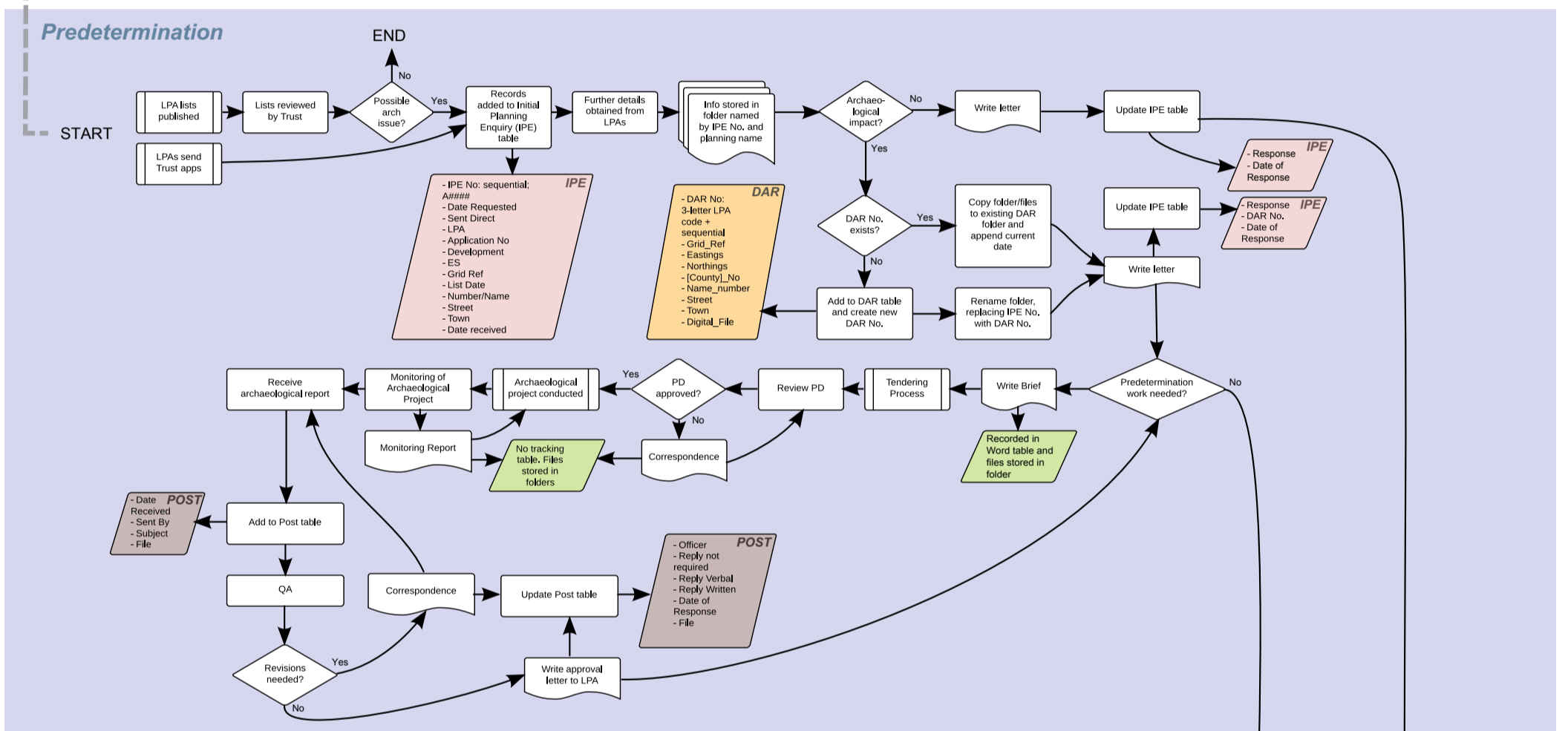
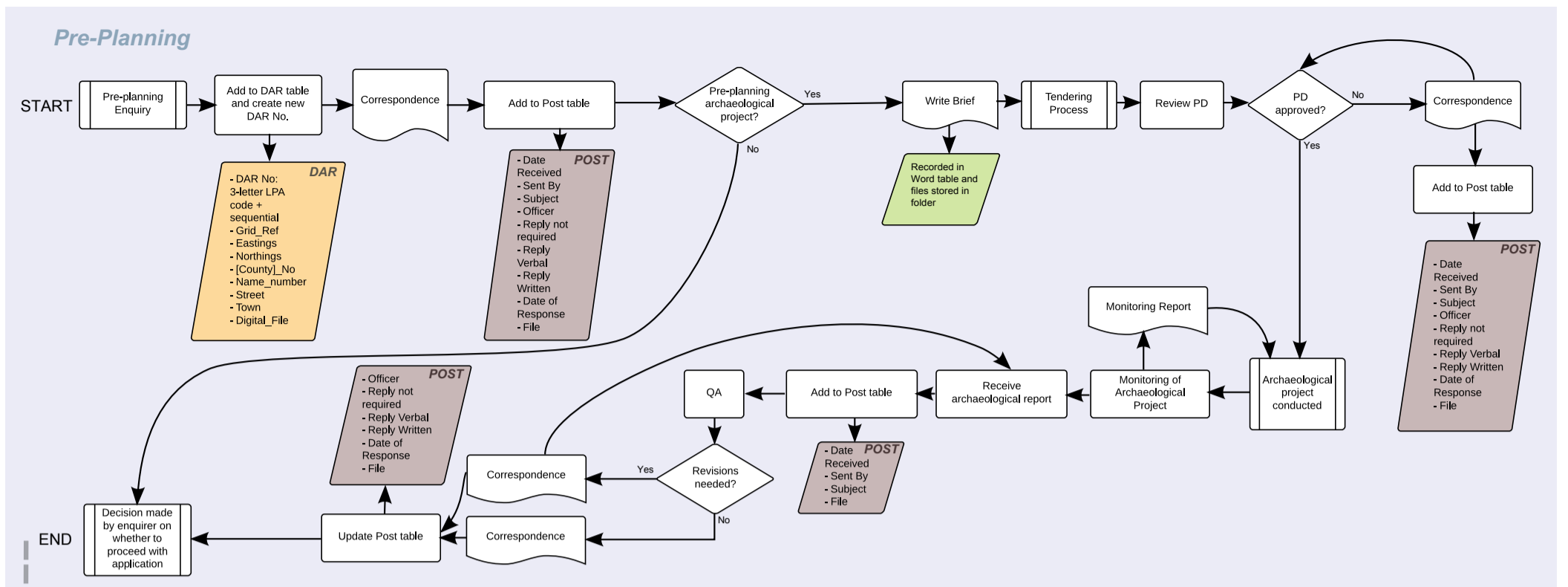
Sites and Monuments Record (SMR): A non statutory record of all known archaeological sites and find locations from a particular area, which are maintained by the appropriate Trust in Wales.

site archive: All material that results from the fieldwork, both invasive and non invasive will be catalogued. It should include original photographs, plans, record sheets, notebooks, etc.

trial excavation: A trial excavation is a physical intervention into the archaeological resource as such it is an operation that causes damage to that resource and should not be undertaken without the explicit approval of GGAT Curatorial. It normally consists of a number of archaeological areas being excavated by mechanical excavator (sometimes all of the area will need to be hand excavated, especially if access to the site is limited) to the uppermost archaeological horizon, which is then cleaned and features sampled in order to determine the date, type, character and extent of the site.

watching brief: A procedure of observation undertaken whilst a site is being developed or an operation, such as the laying of services, is taking place and there is a chance that archaeological material could be disturbed. The procedure results in a report and possibly an archive.

APPENDIX D: GGAT Archaeological Planning Flowchart



Development Control Process

Revision 2 - 12/06/2013

