

**Hayes Digital Park Masterplan
Hayes Bridge Retail Park
Uxbridge Road
Hayes
UB4 0RH**

**WRITTEN SCHEME OF INVESTIGATION FOR
GEOARCHAEOLOGICAL WATCHING BRIEF**

Date 31/03/2026

Project Manager: Dave Taylor



**Hayes Digital Park Masterplan
Hayes Bridge Retail Park
Uxbridge Road
Hayes
UB4 0RH**

London Borough of Hillingdon

Written scheme of investigation for an archaeological watching brief on ground
remediation
Planning application: 78343/APP/2025/2925

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Fig 1: Overall site location

Fig 2: Lagley Silt and Lynch Hill Gravel locations

1 Introduction

1.1 Project background

- 1.1.1 This Written Scheme of Investigation (or WSI) is for an archaeological watching brief on the site at Hayes Digital Park Masterplan, Hayes Bridge Retail Park, Uxbridge Road, Hayes, UB4 0RH. The WSI has been commissioned from MOLA by Macegreen. The NGR for the centre of the site is 511545,180551.
- 1.1.2 The What 3 Words for the site entrance is **cubs.ankle.flock**.
- 1.1.3 The site is bounded by Uxbridge Road to the north, Yeading Brook to the east, industrial units to the west and south. Access is via Uxbridge Road. The site is currently Hayes Bridge Retail Park which is currently partly vacant. The Metro Bank area is not part of the site being investigated. The rear of the site is concrete paved, and the front of the site is asphalt paved, with some small areas of soft landscaping.
- 1.1.4 Prior to redevelopment of the site the made ground requires remediation due to asbestos contamination.
- 1.1.5 Redevelopment of the site includes the demolition of the existing structures on site and the construction of 2no. data centres and an office structure (Tech Hub). 2no. approx. 8m basements are included within the scope of works. It is anticipated that the buildings will be supported on deep piled foundations.
- 1.1.6 This watching brief follows on from a previous watching brief undertaken on a representative selection of cable percussion boreholes, window samples and trial pits across the site which identified areas of Palaeolithic archaeological potential (MOLA 2026).
- 1.1.7 As a result, the current watching brief on ground remediation aims to clarify the Palaeolithic archaeological potential of the site to inform future works and ensure that no Palaeolithic archaeological remains are lost during the turning over of the soil for remediation works.
- 1.1.8 The potential archaeological interest on the site are Palaeolithic remains in undisturbed Langley Silt deposits and particularly in the river terrace deposits capped by the Langley Silts (see MOLA 2026).
- 1.1.9 The works requiring a watching brief on SI excavations located largely at the southern half of the site where Langley Silts were logged previously overlying river terrace deposits (MOLA 2026).
- 1.1.10 An archaeological watching brief as defined by the Chartered Institute for Archaeologists is a *formal programme of observation and investigation conducted during any operation carried out for non-archaeological reasons (see below Section 2.1)*
- 1.1.11 The results of the watching brief will be set out in a report to be issued within 4-6 weeks of completing the fieldwork. The site archive will be deposited with within 12 months of issuing the report and will discharge the compliance condition attached to the ground remediation works.
- 1.1.12 This document sets out the methodologies (including Health & Safety) which will be followed during the watching brief and reporting stages. These will follow the Standards and Code of Practice laid down by the Chartered Institute for Archaeologists (CIFA 2014), London region archaeological guidance from Historic England (GLAAS 2015), and Historic England Centre for Archaeology Guidelines where appropriate.
- 1.1.13 Other relevant documents include:
- Hayes Digital Park Masterplan, Hayes Bridge Retail Park, Uxbridge Road, Hayes, UB4 0RH, Geoarchaeological watching brief report (MOLA 2026)

1.2 Planning and legislative framework

- 1.2.1 The Government issued the *National Planning Policy Framework* (NPPF) in March 2012 (DCLG 2012) and supporting *Planning Practice Guidance* in 2014 (DCLG 2014). The 2012 NPPF was revised and a new NPPF published in July 2018, with minor revisions in February and June 2019 (MHCLG 2019) and more recently in July 2021.

Conserving and enhancing the historic environment

- 1.2.2 The NPPF section concerning “Conserving and enhancing the historic environment” (section 12 of the NPPF 2012) has been replaced by NPPF 2021 Section 16, reproduced in full below:
- 1.2.3 **Para 184.** Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 1.2.4 **Para 185.** Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:
- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
 - b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - c) the desirability of new development making a positive contribution to local character and distinctiveness; and
 - d) opportunities to draw on the contribution made by the historic environment to the character of a place.
- 1.2.5 **Para 186.** When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.
- 1.2.6 **Para 187.** Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:
- a) assess the significance of heritage assets and the contribution they make to their environment; and
 - b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.
- 1.2.7 **Para 188.** Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

Proposals affecting heritage assets

- 1.2.8 **Para 189.** In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 1.2.9 **Para 190.** Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.
- 1.2.10 **Para 191.** Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.
- 1.2.11 **Para 192.** In determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable

communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness.

Considering potential impacts

- 1.2.12 **Para 193.** When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 1.2.13 **Para 194.** Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
 - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
- 1.2.14 **Para 195.** Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- a) the nature of the heritage asset prevents all reasonable uses of the site; and
 - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
 - d) the harm or loss is outweighed by the benefit of bringing the site back into use.
- 1.2.15 **Para 196.** Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 1.2.16 **Para 197.** The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 1.2.17 **Para 198.** In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.
- 1.2.18 **Para 199.** Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.
- 1.2.19 **Para 200.** Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 1.2.20 **Para 201.** Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site

as a whole.

- 1.2.21 **Para 202.** Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

The London Plan

- 1.2.22 The overarching strategies and policies for the whole of the Greater London area are contained within *The London Plan: The Spatial Development Strategy for Greater London* (GLA 2021), formally published on 2nd March 2021.

- 1.2.23 Policy HC1 “Heritage conservation and growth” of the *Publication London Plan* relates to London’s historic environment.

A Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.

B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by:

- 1) setting out a clear vision that recognises and embeds the role of heritage in place-making
- 2) utilising the heritage significance of a site or area in the planning and design process
- 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
- 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

- 1.2.24 Para. 7.1.8 adds ‘Where there is evidence of **deliberate neglect** of and/or damage to a heritage asset to help justify a development proposal, the deteriorated state of that asset should not be taken into account when making a decision on a development proposal’.

- 1.2.25 Para 7.1.11 adds ‘Developments will be expected to avoid or minimise harm to significant archaeological assets. In some cases, remains can be incorporated into and/or interpreted in new development. The physical assets should, where possible, be made available to the public on-site and opportunities taken to actively present the site’s archaeology. Where the archaeological asset cannot be preserved or managed on-site, appropriate provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset, and must be undertaken by suitably-qualified individuals or organisations.’

1.2.26 *London Borough of Hillingdon Local Plan*

1.2.27 The Local Plan Part 1 - Strategic policies sets out the overall level and broad locations of growth up to 2026. Together with the Local Plan Part 2 Development Management Policies and Site Allocations and Designation documents it forms the Council's future development strategy for the borough.

Policy HE1: Heritage

The Council will:

1. Conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes:
 - Historic village cores, Metro-land suburbs, planned residential estates and 19th and 20th century industrial areas, including the Grand Union Canal and its features; Designated heritage assets such as statutorily Listed Buildings, Conservation Areas and Scheduled Ancient Monuments;
 - Registered Parks and Gardens and historic landscapes, both natural and designed; Locally recognised historic features, such as Areas of Special Local Character and Locally Listed Buildings; and
 - Archaeologically significant areas, including Archaeological Priority Zones and Areas.
2. Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register or are currently vacant.
3. Promote increased public awareness, understanding of and access to the borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities.
4. Encourage the reuse and modification of heritage assets, where appropriate, when considering proposals to mitigate or adapt to the effects of climate change. Where negative impact on a heritage asset is identified, seek alternative approaches to achieve similar climate change mitigation outcomes without damage to the asset.

1.3 Archaeological and historical background

1.3.1 A detailed history of the locality can be found in an Archaeological Desk Based Assessment (MOLA 2021a).

1.3.2 (In short, the archaeologically significant deposits consist of river terrace gravels (the Lynch Hill Gravel Member), brickearth (Langley Silts) and alluvium.

1.3.3 The previous watching brief report (MOLA 2026) for the site and other geoarchaeological watching briefs undertaken to the south of the site (Tudor Works and Veetec Motor Group Facility; MOLA 2021; and Substation 2 Plot (Project 2B), Heathrow Interchange Park, MOLA 2025), indicate survival of archaeologically significant Holocene alluvial and untruncated brickearth deposits is generally poor, although Palaeolithic potential remains in areas where the river terrace deposits (the Lynch Hill Gravel Member) are capped by the Langley Silts (and are therefore undisturbed).

1.3.4 The previous watching brief report (MOLA 2026) indicates the Langley Silt or brickearth was thought to be encountered at fifteen locations spread across the site including BH150, 152, 153, 154, 156, 159 and 161, IT502, TP152, 154 and WS234A, 235B, 237, 239A and 240 (Fig 2). The bulk of positions where brickearth was recorded overlying river terrace deposits are largely located in the south of the site (Fig 2) which therefore will be the focus of the current watching brief.

1.3.5 Early Middle Palaeolithic Levalloisian assemblages dated to MIS 8-7 have previously been recorded at West London locations with similar Langley Silt/Lynch Hill Gravel sequences, including the important assemblage from Creffield Road (Historic England 2023). These West London Levallois artefacts are typically recorded as being in fresh condition, suggesting that they were buried without much movement shortly after discard (White et al 2006).

1.4 MOLA team and other responsibilities

1.4.1 In the document below the following terms should be understood:

- 1.4.2 *MOLA (Museum of London Archaeology)* is a company limited by guarantee registered in England and Wales with company registration number 07751831 and charity registration number 1143574. Registered office: Mortimer Wheeler House, 46 Eagle Wharf Road, London N1 7ED.
- 1.4.3 *Project Manager* - MOLA office based manager who is the client's principal point of contact and who has overall responsibility for the project budget and delivery.
- 1.4.4 *Site Supervisor* - MOLA site based manager who is responsible for the direction of the field team. Site supervisors on larger sites will tend to be Project Officers in grade, whilst on other sites they will be *Senior Archaeologists*. On some sites there may be both a Project Officer and/or one or more *Senior Archaeologists*.
- 1.4.5 *Archaeologists* - MOLA excavation staff responsible on site for archaeological excavation.
- 1.4.6 *Field Services Operations Manager* - MOLA office based manager responsible for allocation of staff and supply of equipment and resources.
- 1.4.7 *Health and Safety Compliance Manager* – The MOLA manager with sole responsibility for site inspections, reporting and issuing of recommendations for the Site Supervisor and Project Manager to implement. Reports directly to MOLA CEO.
- 1.4.8 *Finds and Environmental specialists* – MOLA (or external) specialists appropriately qualified to record, analyse and report upon artefacts and environmental remains from archaeological sites.
- 1.4.9 *Principal Contractor* - appointed directly by the Client with overall responsibility for site H&S under CDM regulations.
- 1.4.10 *Attendance Contractor* - the contractor responsible for providing such attendances to MOLA as are deemed necessary to carry out their archaeological work (see section 4.2). These might for instance include but not be restricted to shoring, lighting, facilities, fencing, additional labour, spoil removal, etc The Attendance Contractor may be the same as the Principal Contractor, or it may be subcontracted to the Principal Contractor or it may sub-contracted to MOLA.
- 1.4.11 *Sub-contractor* – where this term is used in this document it refers to any contractor employed directly by MOLA during the course of its work on the site.

2 Objectives of the watching brief

2.1 General considerations

- 2.1.1 The purpose of an archaeological watching brief as defined by the Chartered Institute for Archaeologists (CIfA 2023a) as ‘a formal programme of observation, investigation and recording conducted during works carried out for non-archaeological reasons, where there is a possibility that archaeological deposits may be disturbed or destroyed. This will be within a specified area or site on land, in an inter-tidal zone or under water. This definition and Standard do not cover chance observations, which should lead to an appropriate archaeological project being designed and implemented, nor do they apply to monitoring for preservation of remains in situ’.
- 2.1.2 A watching brief is not intended to reduce the requirement for excavation or preservation of known or inferred deposits, and it is intended to guide, not replace, any requirement for contingent excavation or preservation of possible deposits.
- 2.1.3 Further to para 2.1.2, if during the course of the watching brief it is determined by the local authority that ‘controlled excavation’ is the appropriate mitigation strategy for a given area the appropriate additional objectives and methodologies will be followed, see 2.2.4.

2.2 Site specific objectives

- 2.2.1 The archaeological brief is essentially limited to monitoring ground remediation to establishing where, if at all, archaeological deposits survive (presence/absence), recording where necessary, and to ensuring that the proposed groundworks do not involve the destruction of any archaeological deposits of national significance or disturbance of any insitu flint scatters.
- 2.2.2 The watching brief will involve a MOLA Site Supervisor in attendance on the Principal Contractor’s (or any other contractor employed by them or the client) activities and able to make such records as may be possible *without interrupting the progress of the contractors’ activities*. This may typically include taking photographs, making quick sketches or written records, retrieval of finds and taking levels on observations. The primary purpose of watching briefs will normally be the identification of the limits of features – size, depth, alignment.
- 2.2.3 Bulk finds (Museum of London 2009, 48) will not necessarily be recovered in the watching brief areas. The MOLA Site Supervisor may choose to collect finds from specific features where possible if they are required to help date or interpret them, and any finds of specific and unique intrinsic interest may be retained. The MOLA Site Supervisor may choose to seek advice from MOLA Finds and Environmental Specialists as appropriate. See section 3.3.
- 2.2.4 Where an agreed area is set aside for ‘controlled excavation’ the terms of limitations of paras 2.2.1, 2.2.2 and 2.2.3 do not apply. Agreement must be reached on a) the research aims for ‘controlled excavation’; b) the size and safe demarcation of any such agreed area; and c) appropriate time allocated by the client for the ‘controlled excavation’ to take place. Controlled excavation will then be carried out, finds will be recovered and samples taken in accordance and complying with the CIfA Standard and universal guidance for excavation (2023c) and for the Collection, Documentation, Conservation and Research of Archaeological Materials (2014a). The curator may decide that an additional WSI, or at least a supplement to the present document, is also required.
- 2.2.5 The limited nature of the proposed works and the watching brief upon them makes it unreasonable to establish many specific archaeological research objectives. Nevertheless a few research questions can be outlined:
- What is the nature and level of Lynch Hill Gravel on site?
 - What is the nature and level of Langley Silts on site?
 - Is there potential for undisturbed Palaeolithic occupation surfaces?
 - Is there any evidence for Palaeolithic flint artefacts within the Pleistocene deposits?
 - Is there archaeology from other periods on the site?

- What is the extent of modern disturbance?

3 Watching brief methodology

3.1 Archaeological considerations

- 3.1.1 The geoarchaeological watching brief will cover ground remediation works within Hayes Digital Park, with a focus on Palaeolithic archaeological remains.
- 3.1.2 A MOLA Senior archaeologist or Geoarchaeologist will monitor the work and record any archaeological remains revealed in the appropriate manner (plans, sections, field notes and/or pro-forma 'context sheets'). Any necessary photographic records will be made using digital or conventional media as deemed appropriate. All recording will be carried out in accordance with national standards (CIfA 2023b).
- 3.1.3 Initial breaking out and turning over of the made ground deposits by the Principal Contractor will be monitored by MOLA staff. The archaeologist will ensure that any Langley silts or gravels below the made ground remain undisturbed unless there is contamination hotspots within the top of the Langley silts.
- 3.1.4 Deposits will be recorded by examining the arisings and the deposits will be scanned visually for any flint artefacts associated with palaeolithic remains.
- 3.1.5 If appropriate, spit-samples of at least 100 litres from the Langley Silts and the Lynch Hill Gravels will be numbered, their position in the stratigraphic sequence recorded, and set aside as excavation progresses. 100 litres from each spit-sample will be dry-sieved on site by MOLA Geoarchaeologists through a 1 cm mesh for recovery of lithic artefacts and faunal remains. If the sediment encountered is not suitable for dry sieving (ie. too clayey), excavation will proceed in shallower spits of 5 cm, looking carefully for the presence of any archaeological evidence, and any spit samples will be carefully investigated by hand (using archaeological trowels) for any archaeological evidence. Spit-samples may also be sampled for palaeoenvironmental remains, if encountered.
- 3.1.6 Any finds of human remains will be left *in situ*, covered and protected. If removal is essential it can only take place under appropriate Faculty jurisdiction, Ministry of Justice (Coroner's Division) licence, environmental health regulations, coroner's permission, and if appropriate, in compliance with the Disused Burial Grounds (Amendment) Act 1981 or other local Act. Prior written notice will also be given to the local planning authority. It will be necessary to ensure that adequate security is provided.
- 3.1.7 Because MOLA is providing a monitoring service to an on-going construction programme, the timing of which can vary considerably, it remains the client's responsibility to ensure that their Principal Contractor informs MOLA no later than one week in advance of the start of any proposed groundworks where a watching brief is required.

3.2 Recording systems

- 3.2.1 A unique-number site code will be agreed with the LAA.
- 3.2.2 The recording systems adopted during the investigations will be fully compatible with those most widely used elsewhere in London, and those required by the Archive Receiving Body, the Museum of London.

3.3 Treatment of finds and samples

- 3.3.1 Where necessary, a strategy for sampling archaeological and environmental deposits and structures (which can include soils, timbers, animal bone and human burials) will be developed in consultation between MOLA, the client and the local Planning Authority. Subsequent on-site work and any appropriate analysis of the processed samples and remains will be undertaken by MOLA Finds and Environmental specialists.
- 3.3.2 All retained finds and samples will be exposed, lifted, cleaned, conserved, marked, bagged and boxed in a proper manner and to standards required by the Museum of London (Museum of London 2009).
- 3.3.3 All environmental samples will be collected, labelled inside and outside the container and

processed following Historic England guidance (2011) and to standards required by the Museum of London (2009).

- 3.3.4 All finds of gold and silver, or other objects definable as ‘treasure’, will be removed to a safe place and reported to the local Coroner according to the procedures of the Treasure Act 1996 and the Treasure (Designation) Order 2002. Where removal cannot be effected on the same working day as the discovery suitable security measures will be taken to protect the finds from theft.
- 3.3.5 Advice will be sought from the LPA Archaeological Advisor and the Historic England Regional Archaeological Science Advisor throughout the project, as appropriate.

3.4 Ownership of finds

- 3.4.1 Whereas ownership of any finds on the site lies with the landowner, it is necessary that the landowner gives the necessary approvals, licences and permissions to donate the finds to the Museum of London, to enable that body to carry out its obligations to curate the finds, in perpetuity, as part of the archaeological Archive from this site.
- 3.4.2 These approvals, licences and permissions shall be *either* confirmed in the Agreement and Contract regulating the archaeological works *or* confirmed by the completion of the relevant Deed of Transfer form (draft appended).
- 3.4.3 The client (or their agent) will make arrangements for the signing of the Deed of Transfer Form by the client or, if the landowner is different to the client, by the landowner.
- 3.4.4 Notwithstanding the above, subsequent arrangements may be made if required between the landowner and/or the client and the Museum for the conservation, display, provision of access to or loan of selected finds in or near their original location.

3.5 Reports and archives

- 3.5.1 A *Watching Brief report* will be made available to the client and the Local Planning Authority within six weeks of the completion of fieldwork.
- 3.5.2 If further to paras 2.1.3 and 2.2.4 the need for further ‘controlled excavation’ is identified during the course of the watching brief, any additional such controlled excavation carried out by MOLA will normally lead to a post-excavation assessment report as per Historic England’s ‘Management of Research Projects in the Historic Environment (MoRPHE), PPN 3: Archaeological Excavation’ (Historic England 2008). The need for a post-excavation assessment report may also be determined by the local authority if significant finds or environmental samples have been recovered during the watching brief, even if an area of ‘controlled excavation’ has not been defined during the fieldwork. Any post-excavation assessment report will normally subsume the overall watching brief report.
- 3.5.3 A short summary of the results of the watching brief will be submitted to the Greater London HER and NAR (using the appropriate OASIS archaeological report form) and for publication in an appropriate academic journal.
- 3.5.4 Details of the project will be submitted to the online database maintained by the Online Access to the Index of Archaeological Investigations (OASIS) Project.
- 3.5.5 GIS data will also be made available to the GLHER.
- 3.5.6 Finds and records will be curated by the Museum of London and be available for public consultation in a site archive compatible with other archaeological archives in the Museum of London and adhering to standards set out in the following:
- Archaeological Archive Forum, *Archaeological Archives: a guide to best practice in creation, compilation transfer and curation* (2011),
 - Museum of London, *General Standards for the preparation of archaeological archives deposited with the Museum of London*, (2009),
 - Museums and Galleries Commission’s *Standards in the Museum Care of Archaeological Collections* (1992),
 - Society of Museum Archaeologists’ *draft Selection, Retention and Dispersal of Archaeological Collections* (1992),

- Society of Museum Archaeologists (1995) Towards an Accessible Archive. The Transfer of Archaeological Archives to Museums: Guidelines for Use in England, Northern Ireland, Scotland and Wales,
- United Kingdom Institute for Conservation Guidelines for the preparation of excavation archives for long term storage (1990),
- Chartered Institute for Archaeologists, By-Laws, Standards and Policy Statements of the Chartered Institute for Archaeologists, Standard and guidance: the creation, compilation deposition and transfer of archaeological archives (CIfA 2014b).

3.5.7 Copyright of the written archive will be vested in the Museum.

3.5.8 Pursuant to these agreements the archive will be presented to the archive officer or relevant curator of the Museum within 12 months of the completion of fieldwork (unless alternative arrangements have been agreed in writing with the local planning authority).

3.5.9 A Digital Management Plan (DMP) which outlines the types of data created during the archaeological works and how they will be managed at this stage, stored, accessed and archived is included in Appendix 1. The DMP can be updated to reflect any changes which may occur during the project delivery stage.

4 Programme, staffing and attendances

4.1 Timetable and staffing

- 4.1.1 The timing and overall duration of the archaeological watching brief on the groundworks will be determined by the contractor's programme and the nature and extent of any surviving remains.
- 4.1.2 It is envisaged that a Senior Geoarchaeologist will monitor the groundworks, with Archaeologists to assist with any recording work if required. Other archaeological specialists may be called in if necessary.

4.2 Attendances

- 4.2.1 For watching briefs, the attendances required by MOLA tends to be minimal as archaeologists are in fact attending the on-site works. However, some provision for welfare and working conditions will need to be anticipated. All of the following attendances may be required and supplied by the client, client's agent or MOLA.
- 4.2.2 If additional 'controlled excavation' is required as per para 2.2.4 there may be a need for additional or more extensive attendances. These will have to be discussed and agreed between the client and MOLA but will be as appropriate to and necessary for safe working conditions and adequate site facilities for any additional staff required.
- 4.2.3 Shoring: the need for the shoring of trenches will be determined by a competent person taking into account ground conditions, groundwater conditions, weather conditions, nature of work to be undertaken, how long the work will take, adjacent structures. The shoring will be installed and maintained in accordance with CDM 2015 and HSG 150 throughout the occupancy of the site by a competent person employed by the Principal Contractor/client or his agents. The shoring will be inspected by a competent contractor (Not MOLA) before each shift, any event which may have affected the strength of the shoring, or any un-intentional falls of material or equipment.
- 4.2.4 Where mechanical or electric hoists are to be used in shored shafts, MOLA Health and Safety policy requires staff working in shafts less than 4m x 4m to leave the shaft before hoisting of buckets takes place and not to re-enter until the bucket is lowered back into position. Time for such evacuation will not form part of excavation programme. Beyond a depth of 3m within such shafts gas monitoring equipment will be required to ensure appropriate air quality for those working there. Where mechanical or electrical hoists are in use in larger excavation trenches, the area in which the hoist is in use must be clearly demarcated and no staff will enter this area while the hoist is being raised or lowered.
- 4.2.5 Safety guard-rails and suitable access points into the site and areas of excavation, away from any site traffic and machinery.
- 4.2.6 Ladders into all areas of excavation when the excavated depth requires such access.
- 4.2.7 If ground-water is encountered in the trenches, adequate pumps will be required to remove it in order to complete the excavations.
- 4.2.8 If necessary, lamps (500W minimum) with 110-volt transformer, adequate cabling, and power supply.
- 4.2.9 A suitable security system to operate overnight, weekends and holidays.
- 4.2.10 Labourers to assist in the removal of spoil from deeper areas of excavation.

5 Funding

- 5.1.1 The developer has already agreed to fund the appropriate archaeological watching brief coverage and any 'controlled excavation' which may become necessary, and the costs have been agreed in a separate document.

6 Bibliography

- Archaeological Archive Forum, 2011 *Archaeological Archives: a guide to best practice in creation, compilation transfer and curation*
- Ashton N, Jacobi R, and White M. 2003. The dating of Levallois sites in west London. *Quaternary Newsletter* 99: 25–32.
- BGS 1:50,000, Sheet 256, North London
- Brown, J.A. 1886 'The Thames Valley surface deposits of the Ealing district and their associated Palaeolithic floors' *Quarterly Journal of the Geological Society of London*, 42, 192-200.
- Brown, J.A. 1887 *Palaeolithic Man in North West Middlesex*. Macmillan, London.
- Brown, J.A. 1889 Working sites and inhabited land surfaces of the Palaeolithic period in the Thames Valley. *Transactions of the Middlesex Natural History Society*, 3-36
- Chartered Institute for Archaeologists, (CIfA), 2014a *Standard and guidance for the collection, documentation, conservation and research of archaeological materials*, (updated 1st October 2020)
- Chartered Institute for Archaeologists, (CIfA), 2014b *By-Laws, Standards and Policy Statements of the Chartered Institute for Archaeologists, Standard and guidance for the creation, compilation, deposition and transfer of archaeological archives* (updated 1st October 2020)
- Chartered Institute for Archaeologists, (CIfA), 2023a *Standard for archaeological monitoring and recording* (published December 2023)
- Chartered Institute for Archaeologists, (CIfA), 2023b *Universal guidance for archaeological monitoring and recording* (published December 2023)
- Chartered Institute for Archaeologists (CIfA), 2023c *Universal guidance for archaeological field excavation* (published December 2023)
- DLUHC (Department for Levelling Up, Housing & Communities), 2023 *National Planning Policy Framework*
- Historic England, 2008 'Management of Research Projects in the Historic Environment, PPN 3: Archaeological Excavation' (MoRPHE Project Planning Note 3)
- Historic England, 2011 *'Environmental Archaeology. A Guide to the Theory and Practice of Methods, from Sampling and Recovery to Post-excavation* (second edition) Portsmouth
- Historic England, Greater London Archaeology Advisory Service (GLAAS), 2015 *Guidelines for Archaeological Projects in Greater London*.
- Historic England 2018 *Sites of Early Human Activity: Scheduling Selection Guide*. Swindon. Historic England.
- Historic England 2023 *Curating the Palaeolithic*. Historic England, Swindon.
- MHCLG (Ministry of Housing, Communities and Local Government), 2023 *National Planning Policy Framework*
- Museum of London, 2009 *General Standards for the preparation of archaeological archives deposited with the Museum of London*
- Museums and Galleries Commission, 1992 *Standards in the Museum Care of Archaeological Collections*
- Society of Museum Archaeologists, 1993 *Selection, Retention and Dispersal of Archaeological Collections. Guidelines for use in England, Wales and Northern Ireland*.
- Society of Museum Archaeologists, 1995 *Towards an Accessible Archive. The Transfer of Archaeological Archives to Museums: Guidelines for Use in England, Northern Ireland, Scotland and Wales*
- Thompson, A, Westman A, and Dyson, T (eds), 1998 *Archaeology in Greater London 1965-90: a guide to records of excavations by the Museum of London*, Archaeol Gazetteer Ser Vol 2, London

Treasure Act 1996 *Code of Practice* (2nd Revision) 1996, DCMS

Treasure (Designation) Order 2002

United Kingdom Institute for Conservation, 1990 *Guidelines for the preparation of excavation archives for long term storage*

White, M., Scott, B. and Ashton, N. 2006. The Early Middle Palaeolithic in Britain: archaeology, settlement history and human behaviour. *J. Quaternary Sci.*, Vol. 21 pp. 525–541.

Young, D.S. and Allen, P. 2015 A Report on the Quaternary Geoarchaeology of the site at 1-3 Uxbridge Road, Hayes, London Borough of Hillingdon. Quaternary Scientific (QUEST) Unpublished, June 2015.

7 Appendix 1: Data Management Plan

Project details				
Project Name	Hayes Digital Park Masterplan			
Project Manager	Dave Taylor			
Project Site code	TBC	ADS Ref	TBC	
Accession Code	N/A	Oasis ID	TBC	
Project covered stages	Watching Brief Hayes Digital Park (Hotel) London W1K 5DB			
Related Policies	CIFA DigDigital guidance, MOLA Forthcoming Digital Preservation Policy, DM01; MOLA Forthcoming Digital Data Selection, Appraisal and Discard Policy, DM08, MOLA			
Version control				
Version	Author(s)	Date:	Status	Summary of Changes
1	Graham Spurr	03/03/2026	Draft	For comment
Data Collection/Creation				
Data to be Collected/Created	<p>All file formats created will meet the standards set out in MOLA's Data Management Procedure and Fieldwork Manual.</p> <ul style="list-style-type: none"> The digital documentary archive for this phase of works will consist of: <ul style="list-style-type: none"> - Text: PDF/A documents comprising completed site report, WSI, Brief - Spreadsheets: extracted ORACLE data, including site records and registers - Survey data: GIS shp files - Illustration files: AutoCAD DWG, PDF/A, MapInfo files - Image files: JPEG and high quality non-proprietary raw files (DNG) /TIFF and - Metadata files for the above On site recording of trenches, horizons, and archaeological contexts will be undertaken using a combined method of digital/paper records The recording of all archaeological contexts encountered will be made as paper/digital records on site. Digital registers will be made to record contexts, digital photos, samples, levels, burials, small finds, as appropriate. Plans and sections will be hand drawn and created digitally during post excavation. All planning will be recorded digitally, and data will be stored as .shp or similar file types. <p>Overall photographic shots of the site and each excavation area will be taken prior to excavation and after completion, with detailed shots being made of individual features and groups as appropriate. The photographic</p>			

	record will consist of high-quality digital uninterpolated images. Digital photographs intended for archive purposes will comply with best practice i.e. high quality non-proprietary raw files (DNG) or TIFF images.
How Data will be Collected/ Created	<p>The data will be created according to MOLA's Fieldwork Manual, MOLA'S Data Management Procedure, and in accordance with project specific agreements within the Written Scheme of Investigation (WSI) and best practice guidance.</p> <p>Drawings, plans and sections will be drawn on 5m grid permatrace and then captured digitally during post excavation and added to the digital archive. The grid will be set up by MOLA Geomatics team using a Total Station.</p> <p>Total Station survey data and on-site drawings will be used to create digital illustrations using AutoCAD, ArcGIS, CorelDraw X7 and/or MapInfo software.</p> <p>File structure will be created automatically by Union Square Knowledge Management System and ORACLE CDE databasing. Version control will be managed by a strict file-naming structure and by Union Square Knowledge Management System's inbuilt version control manager.</p>
Documentation and Metadata	
Metadata	Metadata will be created to the standard set out in MOLA's Data Management Procedure. Metadata tables will be updated throughout the course of the project and will be archived along with the digital data at the end of the project.
Documentation	The data will be accompanied by the site report, polyester film sheets, databases, survey data and processed illustrations as PDFs.
Ethical and Legal Compliance	
Data Security Issues	The dataset may contain commercially sensitive data. MOLA will not make data available to any persons outside of the approved MOLA project team without discussion and approval with the client. MOLA will communicate data and updates to the client who will be responsible for distributing any relevant data to any other third parties.
Intellectual Property Rights	The copyright of any written, graphic or photographic records and reports will be transferred to the Museum of London. The data and reports created by any external specialists will be MOLA Copyright; this will be managed through their contracts. Other data not owned by MOLA, such as OS data, HER datasets or historic maps, will be used under license.
Data Storage	
Storage and Backup	<ul style="list-style-type: none"> • Quality assurance processes will include regular review of the collected data on site. • Records will be checked in the office during post-excavation procedures. • MOLA will retain a back-up of the digital data of the project for a minimum of five years following the deposition of the site archive, in accordance with MOLA's Digital Management Procedure. • Paper archives and documentation will be deposited with the relevant Museum Archive • All data collected digitally will be backed up at the end of each day on the MOLA server.

Access and Security	<ul style="list-style-type: none"> • Data recording platforms used (including iPad Pro tablets, tabletop computers and laptops) will be password protected to prevent unauthorised access. • Data will be made available to the project team through the Union Square knowledge management system and controlled via password access, maintained and managed by MOLA IT support.
Selection and Preservation	
Selection	<p>It is understood that not all data accumulated needs to be retained and deposited with the Archaeological Archives.</p> <p>The physical and digital archives will be constructed in accordance with local and national guidelines, and specifically with reference to MOLA's Physical and Digital Data Retention/Discard policies. Discarded data that has been identified for deletion will be recorded as such within the metadata and site records, as appropriate.</p> <p>A minimum this will include is:</p> <ul style="list-style-type: none"> - All relevant on site and Post-excavation images - All relevant copies of on-site recording sheets (including any relevant sketches or explanatory notes) - All relevant survey data - All relevant copies of reports associated with the life of the project
Preservation Plan	<p>The physical and digital archives will be constructed in accordance with local and national guidelines, and specifically with reference to MOLA's Physical and Digital Data Retention/Discard policies. Discarded data that has been identified for deletion will be recorded as such within the metadata and site records, as appropriate.</p> <p>The physical site archive for this phase of works will be temporarily stored at MOLA offices. Upon completion of full analysis, the physical project archive, and hard copies, will be deposited with the relevant Museum.</p> <p>The archive site code is (DVM24) and upon completion of full analysis, the physical archive, hard copy of the reports and paper records will be deposited with the Museum of London Archaeological Archive. The digital project archive, ORACLE database, digital photographs, survey data and metadata tables will be deposited with the appropriate repository in line with the MOL guidelines.</p> <p>Further archiving decisions will be made in discussion with the client, the Museum and GLAAS at the project completion stage.</p>
Data Sharing	
Data Sharing Plan	<p>During the project, site data is likely to be shared with GLAAS and possibly the landowner or their representative. Photographs may also be shared. Site data may also need to be shared with external persons who will be given access to copies of data and not original documentation.</p> <p>The data generated from this project will be made publicly available through submission to the Museum of London Archaeological Archive. A digital report will be uploaded to ADS and an OASIS form will be submitted to the Online Access to the Index of archaeological investigations (OASIS).</p> <p>The file types submitted will comply with the designated digital repository guidelines in-line with the FAIR principles.</p>

	Proposals for publication and dissemination of the archaeological remains are at this stage restricted to Grey Literature style report.
Data Sharing Restrictions	There are no known restrictions on the use of this data after project completion although data will be kept confidential during the project.
Responsibilities and Resources	
Responsibilities	A dedicated Digital Data Officer, the Project Manager and the Senior Archaeological Archivist are responsible for ensuring the data management plan is followed.
Resources	<p>Guidance on digital data will be given throughout the project by the Chief Digital Officer, supported by MOLA IT and Geomatics staff.</p> <p>Requirements for training in digital data collection techniques will be managed by MOLA.</p> <p>The costs of deposition of the digital archive will be covered within the project budget.</p>
References	<p>Cifa, 2014 Standard and guidance for the creation, compilation, transfer and deposition of archaeological archives, Chartered Institute for Archaeologists</p> <p>Archaeological Archives Forum, 2011 Archaeological Archives: A guide to best practice in creation, compilation, transfer and curation, Second edition</p> <p>Museums and Galleries Commission, 1992 Standards in the museum care of archaeological collections</p> <p>Museum of London, 2009 General Standards for the preparation of archaeological archives deposited with the Museum of London</p> <p>Society of Museum Archaeologists, 1993 Selection, Retention and Dispersal of Archaeological Collections. Guidelines for use in England, Wales and Northern Ireland</p> <p>United Kingdom Chartered Institute for Conservation, 1990 Guidelines for the preparation of excavation archives for long term storage</p>

8 Appendix 2: Draft Transfer of finds ownership form

**LONDON
MUSEUM**

DATED

[]

-AND-

**THE BOARD OF GOVERNORS OF
THE LONDON MUSEUM**

TRANSFER AGREEMENT
of Finds excavated at

Site Code



THIS TRANSFER AGREEMENT is made on the day of 20

BETWEEN: -

[], whose registered office is situate at [] (“the Site Owner”);

AND

THE BOARD OF GOVERNORS OF THE MUSEUM OF LONDON¹ an exempt charity established under the Museum of London Acts 1965-1986, whose principal place of business is located at 150 London Wall, London EC2Y 5HN, (“the Museum”) which expression shall include any Governors appointed from time to time acting in accordance with the powers vested in them under the Museum of London Acts 1965-1986.

WHEREAS

- A.** The Site Owner is the owner of a property at [] known by its site code [] whereupon an archaeological intervention has been carried out (“Excavation”) and the Site Owner has granted a developer permission to undertake works on the site (“the Developer”).
- B.** The Site Owner is the owner of any items of archaeological interest found during the Excavation.
- C.** The Site Owner wishes to transfer to the Museum title to the items referred to in Recital B.
- D.** The Museum has agreed to provide facilities for the accommodation and, at its discretion, the display of the items referred to in Recital B on condition that the same are assembled as an archive in accordance with the provisions of this Agreement

each a “Party” and together the “Parties”.

NOW IT IS HEREBY AGREED as follows: -

1. PREPARATION AND DELIVERY OF THE ARCHIVE

1.1 The Parties acknowledge and agree that the Developer shall:

- 1.1.1 procure the preparation of the items of archaeological interest found during the Excavation in accordance with the requirements of the Museum’s *General Standards for the Preparation of Archaeological Archives deposited with the Museum of London*,

¹ London Museum is the working name of The Board of Governors of the Museum of London (a charity registered under the name ‘Museum of London’ with charity no. 1139250)

LONDON MUSEUM

a copy of which is available to the Site Owner for inspection, and generally in accordance with best archaeological practice; and

- 1.1.2 prepare a full inventory of the items of archaeological interest discovered during the Excavation (“the Finds Inventory”) and a list of the boxes and other containers in which those items will be transported to the Museum (“the Final Transfer Summary”). The items of archaeological interest listed in the Finds Inventory are hereinafter referred to as “the Finds”.
- 1.2 The Site Owner is content for the Museum in coordination with the Developer to arrange for delivery of the Finds, Finds Inventory and the Final Transfer Summary to the Museum without cost to the Site Owner, in accordance with the Museum’s preferences as to the method and time of delivery.
- 1.3 In consideration of £1 (whether demanded or not) title to the Finds will, with full title guarantee, pass to the Museum on delivery of the Finds to the Museum in accordance with clause 1.2. Risk in the Finds will also pass to the Museum on completion of delivery of the Finds to the Museum in accordance with clause 1.2.

2. GENERAL

- 2.1 **Governing law and jurisdiction.** This Agreement will be governed by and construed in accordance with the Laws of England and Wales regardless of the place of execution or performance. The English Courts will have exclusive jurisdiction to deal with any dispute or other difference arising out of or in connection with this Agreement unless the Museum chooses to invoke, or voluntarily submits to, the jurisdiction of some other tribunal.
- 2.2 **Further assurance.** The Site Owner at its own expense shall, and shall use all reasonable endeavours to procure that any necessary third party shall, promptly execute and deliver such documents and perform such acts as may reasonably be required for the purpose of giving full effect to this Agreement and to cure any defects in the title to the Finds.
- 2.3 **Applicable laws.** The Parties agree to comply with all applicable laws. The Site Owner acknowledges that the Museum as a leading museum of the United Kingdom and centre of archaeological research encourages reporting of all archaeological material and compliance with the Treasure Act 1996 and Treasure Act Code of Practice both as amended from time to time, and where reasonably applicable agrees to facilitate the Museum in the aforementioned.

IN WITNESS of which the Parties hereto have signed this agreement on the date first written above:



Signed by Name.....

Job Title..... Date
for and on behalf of the **Board of Governors of the Museum of London**

Signed by Name.....

Job Title..... Date
for and on behalf of the **Site Owner**

9 Health and Safety Risk Assessment and Method Statement (RAMS) note

- 9.1.1 A *Health & Safety Risk Assessment and Method Statement* (RAMS) has been prepared by MOLA to accompany this WSI but will be printed out and submitted separately as appropriate.

10 Figures

Geoarchaeological watching brief © MOLA 2025

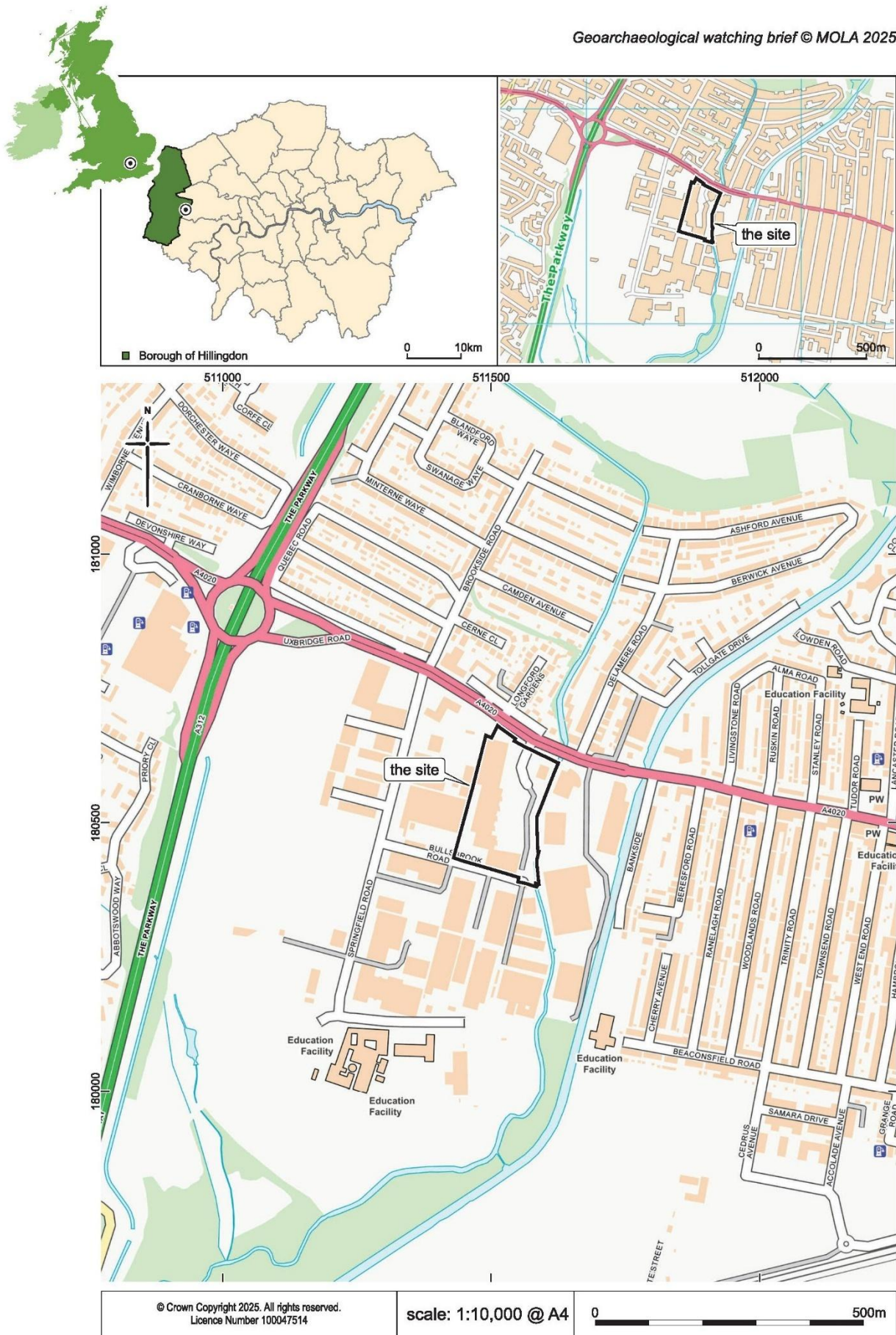


Fig 3 Site location

Geoarchaeological watching brief © MOLA 2026



Fig 4 Lagley Silt and Lynch Hill Gravel locations