

GUARD



University of Glasgow

Glasgow University Archaeological Research Division



Consultancy - Desk Assessments - Fieldwork - Surveys



Buildings - Post-Excavation - Research & Teaching - Specialised Services

Baldrigon, Phase 4, Dundee

Data Structure Report

Planning Reference: 08/00488/FUL

Project 3180



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Baldragon, Phase 4, Dundee

Data Structure Report

On behalf of: Bett Homes

NGR: NO 375 346

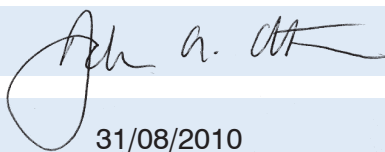
Project Number: 3180

Project Manager: Ronan Toolis

Report by: Ronan Toolis

Illustrations: Fiona Jackson

Approved by:



31/08/2010

Date:

*This document has been prepared in accordance
with GUARD standard operating procedures.*

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Executive Summary

- 1.1 An archaeological evaluation, of the proposed Phase 4 development area at Baldragon in Dundee, was carried out by Glasgow University Archaeological Research Division (GUARD), on behalf of Bett Homes. The evaluation comprised trial trenches amounting to 5% of the 2.25 ha undisturbed part of development area. No significant archaeological features were encountered during the evaluation.

Introduction

- 2.1 This report sets out the results of an archaeological evaluation undertaken by GUARD, on behalf of Bett Homes, of the proposed Phase 4 housing development at Baldragon, Dundee. This work was undertaken to meet Condition 4 of planning application 08/00488/FUL set by Dundee City Council. This planning condition stipulated that no development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation which has been submitted by the client, agreed by the Council's Archaeological Adviser and approved by the Planning Authority.

Site Location, Topography and Geology

- 3.1 The proposed development location lies to the northwest of Dundee (NGR NO 375 346). The development area covers approximately 2.25 hectares and sits between 115 and 120 metres AOD.
- 3.2 The site is bounded by a newly constructed housing estate to the east, a barley field to the north and west and further fields to the south and currently consists of gently sloping arable land, at the time of the evaluation lying fallow (Figure 1).
- 3.3 The underlying drift geology consists of Devensian Till, while the solid geology consists of Dundee Flagstone Formation (EDINA Geology Digimap: accessed 11 August 2010).

Archaeological Background

- 4.1 A Desk-based Assessment, which examined all records for archaeological remains within 500 m of the entire development area, was previously prepared for the planning application (Fouracre 2008). This assessment revealed that the development area was not occupied in recent history and no known archaeological sites are known within its boundaries.
- 4.2 A number of prehistoric sites, however, are known within relative proximity to the development area. These include a possible souterrain cropmark to the north-east and a number of prehistoric settlements to the east and west and at similar elevations to the development area. A number of early medieval monuments, including Pictish symbol stones and Early Christian crosses, have also been found at the parish church of Strathmartine to the north of the development area.
- 4.3 Given these known archaeological remains within relative proximity to the development area, and that the development area had not been subject to previous recorded archaeological investigation, the evaluation had the potential to encounter previously unknown prehistoric and early medieval archaeological remains.

Aims and Objectives

- 5.1 The aim of the archaeological work was to:
 - evaluate 5% of the proposed development area by machine-cut trial trench excavation.

5.2 The objectives of the archaeological work were to:

- establish the presence or absence of any archaeological remains;
- determine the character, extent and significance of any archaeological deposits encountered;
- establish whether there are any archaeological issues resulting from the proposed development and recommend how they may be addressed.

Methodology

- 6.1 All works were undertaken in accordance with the Written Scheme of Investigation (Appendix E), which was agreed in advance with Dundee City Council's Archaeological Adviser and complied with the Institute for Archaeology's Standards and Policy Statements and Code of Conduct and the Dundee City Council Archaeology Service's Standard Conditions.
- 6.2 The evaluation comprised a series of trial trenches, amounting to a total of 5% of the available land within the proposed development area. In this case the available land was the entire area within the proposed development site boundaries, with the exception of the water main service that passes across the south part of the development area. The available land for evaluation was consequently 2.25 ha, therefore requiring some 1,125 m² of trenches to be opened. The evaluation consequently opened eleven trenches (each 50 x 2m) and one trench (13 x 2 m), distributed across the proposed development area (Figure 1).
- 6.3 Topsoil was stripped using a mechanical excavator, fitted with a flat-bladed ditching bucket, under close archaeological supervision. The topsoil was removed in linear trenches to the surface of the natural subsoil or the first significant archaeological horizon, whichever was encountered first.
- 6.4 All on-site recording, written, drawn and photographic, was to the standards normally pertaining in archaeological fieldwork. Trenches were surveyed and located within the National Grid using a sub-metre DGPS.
- 6.5 Trenches were reinstated at the completion of the works.



Plate 1 – Trench 11, southeast-facing section.

Results

- 7.1 The work was undertaken between 9 and 10 August 2010 during variable weather conditions. Twelve trenches were excavated (Figure 1), totalling 1,125 m², the results of which are set out in Appendix B and C. The current landowner confirmed that the field had recently been under barley and before that, potatoes. The trenches revealed a mid orange brown sandy topsoil (0.35 m to 0.5 m thick), which lay over light orange grey sandy clay natural subsoil (Plate 1).
- 7.2 The topsoil was thicker in low-lying areas, and the subsoil showed signs of plough-scoring in the shallower areas (Plate 1).
- 7.3 During the evaluation a background scatter of modern artefacts (glass and ceramics) were noted from topsoil deposits across the area. As these were all modern none of these artefacts were retained. The evaluation encountered no other features of archaeological significance.

Discussion

- 8.1 The evaluation trenching encountered no features, deposits or artefacts of archaeological significance.

Recommendations

- 9.1 The evaluation demonstrated that no archaeologically sensitive deposits or features exist within the development area. In consequence, it is advised that no further archaeological work is likely to be required. GUARD would stress that these recommendations are intended for guidance only. Final decisions on the nature and extent of any future archaeological work rest with the planning authority, Dundee Council, as advised by their Archaeological Advisors, Rathmell Archaeology.
- 9.2 The site archive will be deposited with the National Monuments Record of Scotland within due course and the small finds recovered will be declared to the Crown Agent in accordance with Scots Law, and if claimed, will be transferred to the appointed museum. A report (see Appendix D) will be submitted to the annual journal *Discovery and Excavation in Scotland*. GUARD will also implement the standards and requirements of the Archaeological Standard Protocol for the Integrated Reporting of Events (ASPIRE) and Online Access to the Index of Archaeological Investigations (OASIS).

Acknowledgements

- 10.1 GUARD would like to thank Malcolm McCallie and Matthew Watson of Bett Homes for their assistance. Plant and driver were supplied by P&G Plant Hire. Technical support was provided Aileen Maule and John Kiely. The illustrations were produced by Gillian McSwan. The report was desk top published by Jen Cochrane and Gillian McSwan. The project was managed for GUARD by Ronan Toolis.

Baldragon, Phase 4, Dundee
Data Structure Report

Section 2: Appendices



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Appendices

Appendix A: Bibliography

EDINA Geology Digimap (<http://edina.ac.uk/digimap/>): accessed 11 August 2010.

Fouracre, L 2008 *Baldragon Dundee Desk-Based Assessment*, Unpublished AOC report.

Appendix B: Trench Descriptions

Tr No	Length (m)	Width (m)	Depth (m)	Topsoil/Overburden	Subsoil	Details
1	50	2	0.5	Mid orange brown sandy loam	Light grey orange sandy clay	Light plough scoring
2	50	2	0.55	Mid orange brown sandy loam	Light grey orange sandy clay	Topsoil deepest 10 m from SE end
3	50	2	0.4	Mid orange brown sandy loam	Light grey orange sandy clay	-
4	50	2	0.35	Mid orange brown sandy loam	Light grey orange sandy clay	-
5	50	2	0.35	Mid orange brown sandy loam	Light grey orange sandy clay	-
6	50	2	0.35	Mid orange brown sandy loam	Light grey orange sandy clay	Some outcropping bedrock
7	50	2	0.6	Mid orange brown sandy loam	Light grey orange sandy clay	Topsoil deepest at east end
8	50	2	0.35	Mid orange brown sandy loam	Light grey orange sandy clay	-
9	50	2	0.35	Mid orange brown sandy loam	Light grey orange sandy clay	-
10	50	2	0.35	Mid orange brown sandy loam	Light grey orange sandy clay	-
11	50	2	0.35	Mid orange brown sandy loam	Light grey orange sandy clay	-
12	13	2	0.55	Mid orange brown sandy loam	Light grey orange sandy clay	-

Appendix C: Site Records

List of Photographs

Frame	Area	Subject	Taken From
1	T1	Post-excavation	E
2	T2	Post-excavation	SE
3	T3	Post-excavation	SE
4	T4	Post-excavation	SE
5	T5	Mid-excavation working shot	SE
6	T5	Post-excavation	SE
7	T6	Post-excavation	ESE
8	T2	Representative section	S
9	T7	Post-excavation	E
10	T8	Post-excavation	NE
11	T9	Post-excavation	NE
12	T10	Post-excavation	NE
13		Working shot	NE
14		Working shot	NE
15	T11	Representative section	SE
16	T11	Post-excavation	NE
17	T12	Post-excavation	N

Appendix D: Discovery and Excavation in Scotland Report

LOCAL AUTHORITY:	Dundee
PROJECT TITLE/SITE NAME:	Baldragon (Phase 4)
PROJECT CODE:	3180
PARISH:	Mains And Strathmartine
NAME OF CONTRIBUTOR(S):	Alastair Becket
NAME OF ORGANISATION:	GUARD
TYPE(S) OF PROJECT:	Evaluation
NMRS NO(S):	-
SITE/MONUMENT TYPE(S):	-
SIGNIFICANT FINDS:	None
NGR (2 letters, 6 figures)	NO 375 346
START DATE (this season)	9 August 2010
END DATE (this season)	10 August 2010
PREVIOUS WORK (incl. <i>DES</i> ref.)	-
MAIN (NARRATIVE) DESCRIPTION: (May include information from other fields)	Due to the proximity of known prehistoric and early medieval archaeological remains, an archaeological evaluation was undertaken of an area proposed for development at Baldragon to the north of Dundee. The trial trench evaluation encountered no significant archaeological features.
PROPOSED FUTURE WORK:	None
SPONSOR OR FUNDING BODY:	Bett Homes
CAPTION(S) FOR ILLUSTRS:	-
ADDRESS OF MAIN CONTRIBUTOR:	GUARD, Gregory Building, Lilybank Gardens, University of Glasgow, Glasgow G12 8QQ.
EMAIL ADDRESS:	alastair.becket@glasgow.ac.uk
ARCHIVE LOCATION (intended/deposited)	NMRS

Appendix E: Written Scheme of Investigation**Baldragon, Phase 4, Dundee****Written Scheme of Investigation**

On behalf of: Bett Homes

NGR: NO 375 346

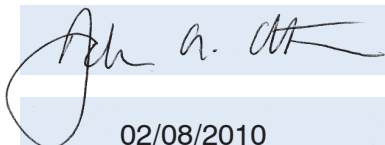
Project Number: 3180

Project Manager: Ronan Toolis

Report by: Ronan Toolis

Illustrations: Fiona Jackson

Approved by:



Date:

02/08/2010

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Introduction

- 1.1 This document sets out a Written Scheme of Investigation (WSI) for a phased programme of archaeological works for the proposed development of the site known as 3180: Baldragon Phase 4, Dundee. An evaluation of the site will be undertaken to establish whether any significant archaeological remains are associated with the site. Should significant remains be identified and it is not possible to preserve them *in situ* a further requirement for archaeological works to ensure their preservation through record is likely to be pursued.
- 1.2 This WSI outlines the entirety of the programme of archaeological works that may be needed to mitigate the effects of the proposed development. It details the methodology to be employed in implementing the Stage 1 archaeological works. The mitigation methodology to be employed during Stage 2 excavation and Stage 3 post excavation analysis and publication, will be specified in *addenda* to this document, if significant archaeology is identified during the evaluation. These *addenda*, if required, will be submitted for agreement of the client, Bett Homes, and notified to the archaeological advisers to Dundee City Council, prior to the commencement of any archaeological work.

Site Location and Archaeological Background

- 2.1 The area of the proposed Baldragon Phase 4 development site subject to archaeological evaluation covers an area of 2.25 ha and is located to the north of Dundee (NGR NO 375 346). The proposed site is bounded to the north, south and west by fields and by a modern housing estate to the east (Figure 1).
- 2.2 A Desk-based Assessment, which examined all records for archaeological remains within 500 m of the entire development area, was previously prepared for the planning application (Fouracre 2008). This assessment revealed that the development area was not occupied in recent history and no known archaeological sites are known within its boundaries.
- 2.3 A number of prehistoric sites, however, are known within relative proximity to the development area. These include a possible souterrain cropmark to the north-east and a number of prehistoric settlements to the east and west and at similar elevations to the development area. A number of early medieval monuments, including Pictish symbol stones and Early Christian crosses, have also been found at the parish church of Strathmartine to the north of the development area.
- 2.4 Given these known archaeological remains within relative proximity of the development area, and that the development area has not been subject to previous recorded archaeological investigation, the evaluation has the potential to encounter previously unknown prehistoric and early medieval archaeological remains.

Planning Background

- 3.1 This WSI has been drafted in response to Condition 4 of planning application 08/00488/FUL set by Dundee City Council. This planning condition stipulates that no development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation which has been submitted by the client, agreed by the Council's Archaeological Adviser and approved by the Planning Authority.

Aims and Objectives

- 4.1 The aim of the archaeological work is to:
 - evaluate 5% of the proposed development area by machine-cut trial trench excavation.

4.2 The objectives of this archaeological work is to:

- establish the presence or absence of any archaeological remains;
- determine the character, extent and significance of any archaeological deposits encountered;
- establish whether there are any archaeological issues resulting from the proposed development and recommend how they may be addressed.

4.3 All works will comply with the Institute for Archaeology's Standards and Policy Statements and Code of Conduct and the Dundee City Council Archaeology Service's Standard Conditions.

Evaluation Methodology

5.1 The evaluation (Stage 1) will comprise a series of trial trenches, amounting to a total of 5 % of the available land within the proposed development area. In this case the available land is the entire area within the proposed development site boundaries, with the exception of the water main service that passes across the south part of the development area. The available land for evaluation is consequently 2.25 ha, therefore requiring some 1,125 m² of trenches to be opened. The evaluation has consequently been designed to open the equivalent of eleven trenches (each 50 x 2m) and one trench (13 x 2 m). As a general rule, the trenches will be evenly distributed across the proposed development area (Figure 1). The capacity to extend trenches in reaction to discoveries in the field will remain an important option for the duration of the evaluation fieldwork but will not entail additional overall trenching beyond 5 % of the available land.

5.2 Trenches will be opened using a mechanical excavator operating under the instruction and constant supervision of a suitably qualified archaeologist. The mechanical excavator will remove the topsoil and any other modern made-ground deposits to the level of the natural subsoil or the first significant archaeological horizon, whichever is encountered first. The back-acting mechanical excavators will be fitted with c. 2 m wide flat-bladed (toothless) ditching buckets, during all trench opening operations.

5.3 Areas of potential archaeological interest within each trench will be cleaned by hand. Should archaeological remains be encountered during trial trenching operations, features and deposits will be recorded but not excavated, except insofar as excavation is necessary to determine the character, extent, quality, date and complexity of the features/deposits present. In cases where potentially highly significant archaeological features/deposits appear to fall largely outwith the limits of any evaluation trench, and where feasible, trenches will be extended in an attempt to fully define the extent of the archaeology present. All discoveries of significant archaeology will be reported by the site director to the GUARD project manager immediately. The manager will in turn inform the client and Dundee City Council's Archaeological Adviser, in order to allow any necessary discussion and planning for appropriate actions arising to take place.

5.4 The written record of all archaeological features, deposits and finds will be by means of conventional *pro forma* sheets. Scaled hand-drawn plans will also be made at 1:20 and sections at 1:10. Black and white record photographs will be taken, along with colour digital images.

5.5 By the close of the evaluation the locations and dimensions of all trenches will be recorded in such a way as to tie them to the OS grid. Trenches will be reinstated at the completion of the works. Any trenches where significant archaeological remains are encountered will only be reinstated under archaeological supervision.

- 5.6 If features of archaeological significance are found within the development area, then further phases of work to mitigate the archaeologically adverse effects of the development may be required to fully comply with the requirements of Dundee City Council. Dundee City Council will be the judge of the need for implementation of further stages of the proposed archaeological programme.
- 5.7 Should human remains be encountered, these will be left *in-situ* and GUARD will notify the local police and Dundee City Council's Archaeological Adviser immediately and thereafter follow prescribed procedure for their treatment, in accordance with the Historic Scotland publication 'The Treatment of Human Remains in Archaeology' (2003 version).
- 5.8 Should significant archaeological remains be identified during the evaluation fieldwork (Stage 1), Stage 2 will involve the implementation of appropriate archaeological mitigation measures, which may consist of further excavation and recording of features that will be destroyed by development works. Stage 3 will include suitable post-excavation analysis, reporting, and publication of discovered archaeological remains, if appropriate. Further details of Stages 2 and 3 of the work programme cannot be developed until such time as the Stage 1 evaluation has taken place.
- 5.9 If the design of the proposed development is flexible at this stage it may be possible to avoid any archaeological remains discovered during the evaluation phase of work. This would be agreed after further consultation with Dundee City Council.
- 5.10 This WSI details the methodology to be employed in implementing the Stage 1 evaluation. The detailed methodology to be employed during any Stage 2 mitigation works and Stage 3 post excavation analysis and publication, would if required be specified in *addenda* to this document, to be called *project designs* for any proposed fieldwork at Stage 2, and *post-excavation research designs* for work required at Stage 3. These *addenda*, if required, will be submitted for the agreement of Dundee City Council, prior to the commencement of any archaeological work, which may be specified in the *addenda* documents.

Reporting, Archive & Small Finds Arrangements

- 6.1 The evaluation (Stage 1) results will be prepared in accordance with standard Dundee City Council reporting requirements (text and illustrations as an integrated single document) submitted in digital form (Adobe PDF; Microsoft Word) and will take the form of a data structure report. The report will make appropriate reference to the curatorial role of the Archaeology Service in facilitating the archaeological works.
- 6.2 A draft of this report will require to be sent for approval by Dundee City Council's Archaeological Adviser prior to formal dissemination. This draft report will be submitted in a manner that permits digital editing while the final version will be uneditable prior to resubmission to Dundee City Council.
- 6.3 This report will enable Dundee City Council to determine whether there is a requirement for further work on the development site and it is at this stage that – if appropriate - any further *addenda* would require to be prepared, in consultation with Dundee City Council's Archaeological Adviser.
- 6.4 The illustrated report will outline the main results of the evaluation fieldwork and incorporate lists of all features, finds, samples, photographs and drawings. It will be produced in-house by GUARD as a desk-top published document and disseminated, along with other required products specified in the Dundee City Council standard reporting requirements, in hard copy and digital formats. The report will also include recommendations for further mitigation measures appropriate to the remains encountered. Implementation of any recommendations offered would however be

conditional on meeting the approval of Dundee City Council. Final decisions on the need for further work, and on the detailed specification of the character of that work, rest with Planning Authority.

- 6.5 A short report detailing the results will also be submitted for publication in *Discovery and Excavation in Scotland*. This summary report will be agreed with Dundee City Council's Archaeological Adviser through inclusion as an appendix in the data structure report.
- 6.6 The project will also be reported through OASIS Scotland. A digital copy of the data structure report will be uploaded as grey literature on to the OASIS website.
- 6.7 Copies of the data structure report, in addition to the copies required by Dundee City Council, will be provided to the client and to the National Monuments Record for Scotland. Further copies will be distributed to other recipients if requested and specified.
- 6.8 GUARD will ensure that the project archive is prepared and ready for submission within six months of the completion of all fieldwork or post-excavation work (as appropriate). The resultant site archive will be deposited with the National Monuments Records for Scotland.
- 6.9 The laws relating to Treasure Trove and *Bona Vacantia* in Scotland apply to all finds where the original owner cannot be identified. This includes all material recovered during archaeological fieldwork. Accordingly, all assemblages recovered from archaeological fieldwork are claimed automatically by the Crown and must be reported to the Scottish Archaeological Finds Allocation Panel through its secretariat, the Treasure Trove Unit. In the event of the discovery of small finds at Baldragon, a filled-out copy of the form "Declaration of an Archaeological Assemblage from Fieldwork" and two copies of the pertinent Data Structure Report will be submitted to the Panel at the conclusion of the fieldwork. The Panel will then be responsible for recommending to the Queen's and Lord Treasurer's Remembrancer (QLTR) which museum should be allocated the finds.
- 6.10 All artefacts will be stored temporarily by GUARD until a decision has been made by the Panel regarding the museum which will be allocated the finds for permanent curation. All finds will be transferred to the appropriate museum within six months of completion of the fieldwork, if no post-excavation work is required, or at the end of the latest finishing post-excavation programme.
- 6.11 In the event that unallocated finds recovered from the site require to be removed from Scotland, for the purposes of post-excavation analysis, GUARD will be legally required to obtain the consent of the QLTR, in the form of a loan agreement. Initially, an indication of intent would be registered with the Treasure Trove Secretariat at the National Museums of Scotland, after which formal consent would be applied for using the form "Application for authority to borrow unallocated Treasure Trove for research purposes". A consent form, signed by the QLTR and specifying conditions (such as the period during which finds may be held outside Scotland) would then be issued. GUARD will require to be in receipt of this signed consent form before items may be removed from the country.
- 6.12 The results of the evaluation may lead to a requirement for further archaeological work (i.e. beyond the evaluation fieldwork and report), either to further fieldwork (Stage 2) and/or to a requirement for post-excavation analysis and publication of results (Stage 3), in order to fully fulfil the planning condition. In either case further documents specifying that work will require to be prepared and approved in advance of implementation by Dundee City Council. A post-excavation strategy, including timescales and cost implications can only be prepared following the completion of all archaeological fieldwork (i.e. if there is to be Stage 2 work, it will not be possible prior to its completion to specify, cost or time Stage 3 work).

Monitoring

- 7.1 Dundee City Council's Archaeological Adviser will have a formal monitoring role on behalf of Dundee City Council and may elect to visit the site during archaeological work as part of that role.
- 7.2 GUARD proposes to undertake the evaluation during the week commencing 9 August. GUARD will ensure works are conducted in a manner which enables monitoring to be undertaken. GUARD will provide the site mobile phone number to Dundee City Council's Archaeological Adviser prior to the commencement of fieldwork.
- 7.3 GUARD will furthermore notify Dundee City Council's Archaeological Adviser and Bett Homes immediately of any unexpectedly significant or complex discoveries, or other unexpected occurrences which might significantly affect the archaeological work and/or the development. In that event, all finds and features will be left *in situ* until arrangements have been agreed for safeguarding or recording them.
- 7.4 It will be important to ensure that all formal communication, requests (including any proposed amendments to on-site strategies) and contacts be made, ultimately in writing and in the first instance to the project manager (as opposed to the site director or other members of the on-site team), to ensure organisational, administrative and financial efficiency.
- 7.5 Any site visitors will also be required to conform to the health and safety regime in place during the fieldwork programme.

Timetable

- 8.1 Week 1: 2-6 August 2010 (Set Up)

Week 2: 9-13 August 2010 (Evaluation)

Weeks 3-4: 16 August - 27 August 2010 (Reporting to draft & submission of draft for approval)

Weeks 5-6: 30 August - 10 September 2010 (Any edits required and dissemination of final copies)
- 8.2 These dates are provisional and subject to factors such as the duration of the initial fieldwork and the return of reports from the local authority within the timescale indicated
- 8.3 This timetable does not include any provision for any Stage 2 or Stage 3 work which might be required.

Personnel

- 9.1 GUARD's dedicated project manager for all the works outlined above is Mr Ronan Toolis and he will be the first point of contact for any project-related liaison with Dundee City Council's Archaeological Adviser and Bett Homes for all formal logistical, administrative and financial aspects of the project.
- 9.2 GUARD's dedicated Project Director for all the works outlined above is Alastair Becket and he will be on-site for the duration of the archaeological project. Alastair has substantial professional experience at supervising archaeological watching briefs, evaluations and excavations. If requested Alastair's CV can be forwarded to Dundee City Council's Archaeological Adviser for approval prior to the commencement of archaeological works.

Health & Safety and Insurance

- 10.1 GUARD will conduct the evaluation in accordance with Health and Safety legislation and with the guidelines and standards governing archaeological fieldwork set down in the IFA approved Health and Safety in Archaeological Fieldwork document prepared by SCAUM. Prior to fieldwork commencing a risk assessment of the project will be undertaken, giving rise to a project-specific safety plan. GUARD also possess all necessary insurance cover, including employer's and public liability insurance cover, proofs of which will be supplied upon request.

Bibliographic References Consulted

- 11.1 Fouracre, L 2008 *Baldragon Dundee Desk-Based Assessment*, Unpublished AOC report.

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