

Archaeology and Planning: Guidance for Contractors

1. Service Standards

Whilst national guidance means that an applicant and their agent can expect to encounter broadly compatible services across the country the following guidance sets out how matters are likely to be dealt with locally.

- 1.1. The County Archaeologist is the archaeological advisor to the planning authorities. They do not make decisions or have the authority to approve specifications or discharge decisions unless authorised by the Planning Authority to do so.
- 1.2. It is expected that a Heritage Statement (or an EIA) will inform planning decisions and will set out a mitigation strategy for the consideration of the planning authority. In most cases the appropriate mitigation not only reflects the character of the archaeology but also the nature of the development, the circumstances of the applicant and their flexibility or risk aversion. It is therefore important that the applicant or their agent ensure that all influencing factors are addressed when setting out the best fit mitigation strategy as they will have all these factors to hand.
- 1.3. The County Archaeologist is happy to endorse a mitigation strategy to the planning authority if it meets the archaeological concerns.
- 1.4. If the mitigation strategy that has been set out is not satisfactory the County Archaeologist will be happy to offer advice, to the applicant or the planning authority, as to how the weaknesses should be addressed.
- 1.5. The County Archaeologist does not routinely produce briefs for archaeological work. What should be covered by the archaeological work in order to satisfy the planning authority work would usually be set out in the advice to the planning authority at the time of consultation. The County Archaeologist is happy to advise as to what should be covered by the archaeological work.

2. Heritage Statements

- 2.1. The Heritage Statement submitted with a planning application should set out, proportionate to the development and the archaeology:
 - the archaeological issues the development raises
 - the impact of the development on archaeological remains and
 - propose a mitigation strategy that would ensure that the development will be sustainable. The mitigation is that which the applicant proposes to implement to satisfy the planning authority that all archaeological issues will be addressed.
- 2.2. In some circumstances the Heritage Statement might be brief, little more than a cogently argued dismissal of archaeological issues. In others complex and detailed argument supplemented by field investigation might be required to support the proposed mitigation. In either case it is important that the Heritage Statement has sufficient content and clarity of case that it enables the planning authority to determine the application.
- 2.3. A Heritage Statement will typically assess the archaeological potential of the site.
 - 2.3.1. This might be known archaeology, remains that might be, or evidence that past land use that may have destroyed or compromised archaeological survival.

2.3.2. The assessment of the sites archaeological potential should be based upon the landscape context of the site and not simply the results of a centred HER search.

2.4. The Heritage Statement should assess the impact of the development, including aspects such as:

- ground works (including landscaping)
- impact on water table (which could have an impact upon preservation *in situ*),
- impact on the setting of heritage assets (both within and outside of the site), or
- increased pressure on a site management through adjacent land use change (e.g. recreational pressure).

2.5. The Heritage Statement should set out how the impacts might be mitigated, such as:

- within sympathetic design;
- within foundation design;
- preservation of archaeological remains for example in open space;
- within Green Infrastructure plans;
- by archaeological excavation through to publication;
- a watching brief during development or
- building recording of structures of historic value that will be lost.

2.6. The Heritage Statement might also seek to set out the positive opportunities that arise through development, such as:

- a positive influence on design and sense of place;
- using archaeology or the archaeological story within the development (e.g. through place naming, open space, interpretation panels);
- making available archaeological knowledge for to the local community;
- the potential role of local heritage in green infrastructure,
- influence on street naming or
- choice and design of public art.

3. Archaeological conditions

Archaeological mitigation would usually be secured by an archaeological condition attached to any planning permission which might be issued.

3.1. Where the condition derives from a well constructed Heritage Statement the aims of the condition should be familiar to the applicant as being those proposed in the Heritage Statement. But in any event the County Archaeologist will seek to make clear the objectives of the archaeological condition within the consultation response.

3.2. A standard archaeological condition would normally provide that no development will take place until the implementation of a written scheme of investigation (WSI) has been approved and secured. This allows the details and complexities of the scheme to be explored in the WSI. However, given the nature of the wording of the standard condition it is important that both the Heritage Statement and the County Archaeologist's request for a archaeological condition are clear in what it is anticipated the condition will secure.

Our comments will be displayed on the relevant planning webpage. The wording of the condition may be vague but the use of the condition should not be vague

3.3. The County Archaeologist usually assists the Planning Authority on technical archaeological matters relating to:

- the content of a WSI (which the Planning Authority will need to approve)
- the implementation of the archaeological condition
- on site monitoring to ensure implementation of the WSI is effective , and
- monitoring of the post excavation process.

In many cases the planning authority is happy for the County Archaeologist to address technical matters directly with the applicant's archaeologist, but this may need to be confirmed in individual cases. **In all instances however the County Archaeologist is acting as advisor to the planning authority.**

3.4. The County Archaeologist advises the planning authority on archaeological issues arising from a request to discharge an archaeological condition. The post-excavation process can be prolonged particularly in the case of complex excavation and an applicant will frequently explore the possibility of discharging the archaeological condition before this process is fully complete. In most cases it would be inappropriate to endorse the discharge of a condition prior to the completion of field work as surprises can arise whilst still in the field. Partial discharge of the condition may be recommended in situations where fieldwork is complete but the post excavation and reporting process has yet to be completed.

4. Written Scheme of Investigation

4.1. The County Archaeologist does not routinely produce briefs for archaeological work and what should be covered by the work would usually be in the advice to the planning authority.

4.2. In many cases the planning authority is happy for the County Archaeologist to address technical matters, such as the content of a WSI, directly with the applicant's archaeologist, but this may need to be confirmed in individual cases.

4.3. In all instances however the County Archaeologist is acting as advisor to the planning authority and all references within the WSI should refer to their role as archaeological advisor to the planning authority.

4.4. The WSI should include the planning reference for the planning application it relates to.

4.5. The WSI should set out the archaeological background to the investigation, including reference to any research frameworks that may be relevant.

4.6. The WSI should include reference to the Historic Environment Record as source of information and as repository for any reports produced.

4.7. The WSI should set out the proposed mitigation in some detail, including both excavation and post-excavation processes.

4.8. If the WSI is for one phase of a staged/phased programme of work then it should make this clear and set out how the results of this stage will inform subsequent stages of investigation.

- 4.9. The WSI should include consideration of how the results of the excavation will be publically disseminated, e.g. through publication, presentation on a webpage, site visits, talks to schools and local community groups.
- 4.10. It is expected that, in most instances, a WSI will be submitted for each phase of a phase programme of work.

5. Archaeological management plans

For complex or large development it may be useful for an archaeological management plan to be produced which guides archaeological mitigation on the site. In many situations this plan could be referred to in any archaeological condition that might be attached to planning consent. Archaeological management plans could include evaluation strategy, mitigation strategy, strategy for public engagement, strategy for future management of archaeological sites preserved *in situ*.

- 1.1.1. The archaeological management plan should include an assessment of the potential for archaeological findings. It should make clear provision for archaeological evaluation and the accommodation of the findings and the implied archaeological mitigation within the work programme and, if necessary, design. The management plan should also address the strategy for public engagement with the results of archaeological investigation.
- 1.1.2. If the archaeological management plan that has been set out is not satisfactory the County Archaeologist will be happy to offer advice, to the applicant or the planning authority, as to how the weaknesses should be addressed. The County Archaeologist will also be happy to endorse an archaeological management plan to the planning authority if it meets the archaeological concerns.
- 1.1.3. A good archaeological management plan will set out the future management of archaeological concerns and can be the basis for any archaeological conditions that might be attached to planning consent. This approach might be particularly useful where sites are being sold on, or developed by multiple developers following outline consent.

6. Archaeological field evaluations

Evaluation is defined here as the process by which the archaeology of a site is assessed in the field and includes both invasive (e.g. trenching) and non-invasive (e.g. geophysics) techniques.

The County Archaeologist would refer to industry standards for undertaking field evaluation and geophysical survey as set out by the Institute for Archaeologists^{1,2}.

6.1. General evaluation information

- 6.1.1. The evaluation methods (geophysics, field walking, trial trenching, test pits, bore holes etc.) should reflect the nature of the archaeological target. Techniques and percentages of the samples need to be supported by a cogent argument rather than adhering to a 'standard' formula.
- 6.1.2. With regard to trench layout and sampling frequency trenches of more than 30m are unlikely to be acceptable. Generally fewer larger trenches provide an

¹ http://www.archaeologists.net/sites/default/files/node-files/ifa_standards_field_eval.pdf

² <http://www.archaeologists.net/sites/default/files/node-files/Geophysics2010.pdf>

inadequate sample frequency on which to extrapolate results. A larger number of shorter trenches increases the sample frequency and improves the capacity to extrapolate the results.

6.2. Pre-determination evaluation

A pre-determination evaluation is usually necessary where the outcome of the evaluation has the potential to alter the determination of the application, e.g. may discover something that could require preservation, or something whose excavation is so onerous as to be an unreasonable burden to secure through a condition.

- 6.2.1. A pre-determination evaluation is strongly advised for very large developments where given the scale of the development the potential for previously unidentified archaeological remains of this nature to be discovered is greater.
- 6.2.2. It is also strongly advised for larger developments so that any resulting mitigative investigations can be incorporated into the development programme.
- 6.2.3. Early evaluation also facilitates the incorporation of historic environment features into design and enables the positive aspects of the historic environment to be presented with the planning application.

6.3. Evaluation as condition

- 6.3.1. Evaluation is often undertaken as a first stage of a programme of archaeological mitigation secured by a condition. The same principles apply with the results informing any subsequent mitigation that may be required
- 6.3.2. Typically where evaluation has taken place under condition attached to an outline planning consent the results of the evaluation stage of work would be expected to be submitted with any detailed application.

7. Archaeological recording/mitigation

7.1. Watching briefs

- 7.1.1. Watching briefs are generally appropriate when the nature of the archaeological remains that might reasonably be expected are such that they could satisfactorily be dealt with without undue delay to development works. In some circumstances delay is unavoidable, however if it is anticipated that extensive, substantive or complex remains will be recovered then a watching brief is unlikely to be appropriate.
- 7.1.2. Generally it is expected that watching briefs will monitor all groundworks associated with development including the excavation foundations, excavation of utilities, site levelling, construction of access routes, and groundworks associated with landscaping.
- 7.1.3. Generally it is expected that an archaeologist will be present during all groundworks. However, a watching brief may be intermittent or periodic if this is appropriate to the nature of the archaeology and the impact.
- 7.1.4. It is generally expected that while the areas of excavation are driven by the requirements of the development provision should be made for the recording of any archaeological remains that might be encountered.

7.1.5. The County Archaeologist would refer to industry standards for undertaking watching briefs as set out by the Institute for Archaeologists³.

7.1.6. Any watching brief should be undertaken with reference to a research framework⁴.

7.2. Excavation

7.2.1. The County Archaeologist would refer to industry standards for undertaking excavation as set out by the Institute for Archaeologists⁵.

7.2.2. Any excavation should be undertaken with reference to a research framework⁶.

7.3. Building recording

7.3.1. The County Archaeologist would refer to industry standards for undertaking recording of standing buildings and structures as set out by the Institute for Archaeologists⁷.

7.3.2. Any building recording should be undertaken with reference to a research framework⁸.

8. Sampling

8.1. Excavation as sampling: within an evaluation

8.1.1. Sampling archaeological features within evaluation trenches should be driven by a need to fully understand the results rather than by a pre-determined sampling strategy. It is inappropriate to take a 'sample of a sample' without regard to the aim of the project.

8.1.2. Sufficient of the deposits should be excavated in order to achieve the objectives of the evaluation. This is usually to establish the presence, extent and nature of the archaeology, to characterise it and to provide a basis for research questions for any subsequent mitigative investigations.

8.2. Excavation as sampling: within an excavation

8.2.1. Where an area excavation is taking place a pre-determined sampling strategy can be set out for guidance but must have flexibility within it to react appropriately to the excavation as it progresses. For example, it would be usual to expect discrete features to be half sectioned, but provisions that some of those features might require full excavation if they are likely to contain vital evidence must also be

³ http://www.archaeologists.net/sites/default/files/node-files/ifa_standards_watching.pdf

⁴ *Solent Thames Research Framework*

http://thehumanjourney.net/index.php?option=com_content&task=view&id=553&Itemid=277

Hampshire County Council Research Framework available on the webpage

⁵ http://www.archaeologists.net/sites/default/files/node-files/ifa_standards_excavation.pdf

⁶ *Solent Thames Research Framework*

http://thehumanjourney.net/index.php?option=com_content&task=view&id=553&Itemid=277

Hampshire County Council Research Framework available on the webpage

⁷ http://www.archaeologists.net/sites/default/files/node-files/ifa_standards_buildings.pdf

⁸ *Solent Thames Research Framework*

http://thehumanjourney.net/index.php?option=com_content&task=view&id=553&Itemid=277

Hampshire County Council Research Framework available on the webpage

acknowledged. Likewise the sampling percentages of linear features can vary greatly depending on how predictable the results are likely to be over stretches.

- 8.2.2. In general sufficient of a deposit or feature should be excavated to understand it, its date, function, origin, formation and relationships to other features and deposits.
- 8.2.3. The archaeological contractor should also ensure that sufficient of the features and deposits is excavated to answer any research questions posed.

8.3. Environmental and specialist sampling

- 8.3.1. Palaeo-environmental sampling should be subject to a cogent plan with reference to relevant research frameworks rather than simply to an industry standard. If necessary specialist advice should be sought regarding palaeo-environmental sampling.
- 8.3.2. Provision should be made for sampling appropriate to the geology and nature of the archaeology on the site. For example if waterlogged deposits might reasonably be anticipated then the sampling should address this.

9. Monitoring

- 9.1. It would be usual to keep the County Archaeologist informed as to the timetable of works (excavation and post-excavation) and of findings on site so as to enable appropriately timed monitoring or assistance. It is not always necessary for site monitoring to take place particularly where results are negative or highly predictable, but the option and opportunity of site monitoring should always be made.
- 9.2. Sufficient notice should be given of the start of works so that the County Archaeologist can arrange to visit the site if necessary.

10. Post excavation

The post excavation process needs to be clear in its aims and objectives. The preservation by record of archaeological sites necessitates some degree of post-excavation analysis to establish the significance of the archaeological findings and to provide information to contribute to the archaeological story of the site. The post excavation work also needs to make the archive, including paper record, available and accessible (physically and intellectually) for future research. There is a distinction, however, and a line to be drawn between post-excavation analysis as part of a programme of mitigation of impact of a development (what it is reasonable to expect a developer to fund) and research (what is beyond what is reasonable to expect a developer to fund). Where this line is drawn should be set out in the post-excavation assessment.

10.1. Negative results

Not all archaeological investigations will find anything, but this negative information is still valuable.

- 10.1.1. If archaeology was not found, but the site was demonstrated to have been substantially disturbed in the past this can inform future investigations in the area.
- 10.1.2. A genuine absence of archaeology helps advance our understanding of how people lived in and used the landscape in the past. Even excavations where no artefacts or features are identified can provide information to this end.

11. Publications

The NPPF identifies as a core planning principle that planning should:

‘conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.’⁹

The NPPF also states that the Planning Authority 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) publically accessible.’¹⁰

It is therefore the developer’s responsibility to ensure that the results of archaeological investigations are made publically accessible. This will need to be undertaken in order to comply with the archaeological condition. However, presenting archaeological findings to the public is a good way of positively engaging the community with the development, contributing to a sense of place, community and identity.

11.1. Public liaison

Presenting the archaeological story of a site to the public is an important part of the archaeological mitigation process. This can be done in a number of ways and thought needs to be given as to what is most appropriate to the archaeological findings.

- 11.1.1. Public liaison need not be costly – something as simple as a notice board where updates on the site findings are presented, or a public friendly report posted on a webpage may be sufficient. More involved means could include guided tours of the excavations, talks to local schools or societies, or publications aimed at the public.
- 11.1.2. Good public engagement can be extremely positive for the developer, enabling them to give something positive back to the community at a very early stage in the development for relatively low cost. Generally speaking people are interested in archaeology, even what might seem rather simple, run of the mill archaeological findings to professional archaeologists can be extremely significant for the local community.
- 11.1.3. Early archaeological investigation, and early consideration of public engagement strategies, enables more cost effective, positive results that benefit the local community. An archaeological discovery could provide a focus for an area of greenspace, a feature in a new landscape or inspire public art or street names.

11.2. HER

The Historic Environment Record is the repository for archaeological reports.

- 11.2.1. In Hampshire we maintain both a paper and digital archive and require one hard copy and a digital copy of any reports.
- 11.2.2. If possible we would also request GIS shape files or CAD plans of trench locations and excavation areas so that we can incorporate these in a GIS layer of excavations for the HER.
- 11.2.3. The HER charging policy is on the Hampshire County Council Archaeology webpage.

⁹ NPPF paragraph 17, tenth bullet, page 6

¹⁰ NPPF paragraph 141, page 32

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