**ASSOCIATION OF
COUNTY ARCHAEOLOGICAL
OFFICERS**

Model Briefs and Specifications for Archaeological Assessments and Field Evaluations

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Further copies of this booklet can be obtained by sending an A4 sized SAE to the above address or to English Heritage, Archaeology Division, Fortress House, 23 Savile Row, LONDON WIX 2HE. Multiple copy orders will be charged at £2.50 per copy including p & p.

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Introduction

Information on the potential archaeological impact of an application for planning permission to develop land must be available prior to determination so that it may be taken fully into account as a material consideration. This accords with DoE's Planning Policy Guidance Note 16 on Archaeology and Planning, and with policies in the Structure and Local Plans prepared by local planning authorities.

The Assessments and Field Evaluations which may be required to provide that information must be designed and specified within the context of Briefs issued by the archaeological adviser to the local planning authority (the planning archaeologist). These are the members of ACAO together with some District Archaeologists, and, prospectively, their equivalents in the new unitary authorities.

This advisory note offers a generalised framework for
a **Brief as the basis for a subsequent Specification**, or for
a **Brief incorporating a Specification**.

In drawing upon examples already in use, it intends to provide a firm basis for the production of models which reflect local needs in town and countryside. The principles and procedures are generally applicable to all proposals for ground disturbance with a potential archaeological dimension, including works outside planning control or evaluations initiated after determination of an application. An Appendix comments on issues arising from the involvement of archaeology in the planning process. The advice is primarily concerned with England and Wales.

In recognising that model briefs and specifications can be valuable and time-saving devices for planning archaeologists, consultants and contractors, ACAO would also stress that they are no more than a ftamework for a wide variety of individual cases, the design of each needing to address particular problems and circumstances. Unresponsive use of models could produce poor results that might undermine the credibility of evaluation as a process, as well as inhibit its technical development. This topic is rapidly evolving: ACAO welcomes comments on matters that might be considered in a future edition, and the booklet has been designed to facilitate marginal ann9tation.

*The **Association of County Archaeological Officers** was founded in* 1973. *It has members or observers representing all the counties of England and Wales. Their responsibilities include the provision of planning advice, the maintenance of Sites and Monuments Records, and, in some cases, fieldwork investigation and recording.*

Definitons

Terminology follows the five-stage sequence for integrating archaeological aspects within the development process as defined by English Heritage following Darvill and Gerrard (1990). These are Appraisal, Assessment, Field Evaluation, Strategy Formulation and Strategy Implementation. This document focuses upon the first three stages.

An *Appraisal* is a rapid reconnaissance of site and records to identify whether a development proposal has a potential archaeological dimension requiring further clarification.

An *Assessment* is a thorough review of all existing archaeological information relating to an area potentially affected by proposals. for development, stopping short of further data collection and synthesis through primary research including fieldwork.

A *Field Evaluation* is a programme of intrusive and / or non-intrusive fieldwork designed to supplement and improve existing information to a level of confidence at which planning recommendations can be made.

According to the scale and circumstances of a case, some of the stages of *Appraisal, Assessment* and *Field Evaluation* may be run together as a sequence. Some may begin with a *Field Evaluation* incorporating work that in other cases would have been done earlier in an *Assessment.* Always, it is important to:

(a) ensure applicants provide adequate information
(b) keep the stages of work required of them as simple as possible
(c) keep archaeological requirements made of a developer reasonable and necessary.

A *Brief* is defined as an outline framework of the planning and archaeological situation which has to be addressed, together with an indication of the scope of works that will be required.

A *Specification* is a schedule of works in sufficient detail to be quantifiable, implemented and monitored.

In preparing a Brief (or Brief and Specification), consideration should be given to the following elements.

1 Summary of Brief

This will be a short 'plain-language' summary, intelligible to a lay recipient and suitable for copying by a planning archaeologist or applicant's consultant to non-archaeological colleagues or employers who need to know about it. It should identify the location of the SMR, the planning archaeologist and the local registered museum.

2 Site Location and Description

This will accurately identify the site on a map extract at an appropriate scale. Normally the author will make a site inspection as the basis for describing matters such as altitude, current land use, vegetation cover and any other relevant factors. It should include any readily available information about possible physical constraints upon investigations known to the developer or planners, while not absolving others from taking any necessary precautions over underground services, overhead lines, basements, etcetera.

3 Planning Background

This will describe the proposal, and include any local planning authority reference number. It may describe any significant planning history and refer to relevant planning policies (PPG16 may also be cited). Information may be provided about other environmental matters the planning authority may need to take into consideration, such as ecology and rights of way. Any need for scheduled monument consent in order to carry out evaluation by fieldwork will be indicated.

4 Archaeological Background

This will summarise what is known already about the archaeological potential of the land affected by the proposal, and, as far as is relevant, the surrounding area. In the case of town sites it should indicate whether deep strata are known to survive locally. The level of detail must be sufficient to support a recommendation for evaluation. Technical terms such as 'neolithic' should be explained. Any available information about the likely state of preservation should be provided, or the lack of such information indicated. Grid references should be provided for sites mentioned but not shown on a plan. If the brief is for an *Assessment*, this section will incorporate an *Appraisal* of SMR information. If it is for a *Field Evaluation* this section will incorporate the results of any earlier *Appraisal* or *Assessment,* together with an indication of the completeness and reliability of the information obtained.

5 Requirement for Work

Against the planning and archaeological background this section will indicate why an assessment or evaluation is required. Its purpose will be to enable the local planning authority to make an informed and reasonable decision on the planning application. In general terms its scope will be to gather sufficient information to establish the presence / absence, extent, condition, character, quality and date of any archaeological deposits within the whole of the area potentially affected by development. This section can be supplemented by a preliminary comment on the potential of known or suspected deposits for addressing research themes relevant to local and regional archaeological understanding, as an explanation why it is necessary to clarify whether they ought to be preserved.

6 Stages of Work and Techniques

6.1 In the case of a **Brief for a separate Specification**, this will outline the range of available investigative techniques, and require justification for those selected in the light of local geology and land-use. It may indicate the sequence or combination of different techniques in a 'nested' approach, with the detailed design of one stage arising from the accumulating results of previous stage(s). It will provide any general information about strategy and timetable. The Brief will also be the planning archaeologist's yardstick for validating any detailed project design or specification.

6.2 In the case of a **Brief incorporating a detailed Specification**, the investigative techniques and the stages of work will be identified. They will be described in sufficient detail

(a) for time and cost to be estimated by a contractor

(b) to provide a fair basis for seeking competitive quotations

(c) to facilitate validation of contractors' methodological proposals by the planning archaeologist.

6.3 Some of the investigative techniques will apply only to an *Assessment*, others only to a *Field Evaluation,* and some to both, but at different intensities. All techniques should be considered but the following are the most commonly applicable:

(a) *Completion / Review of Desk- Top SMR Assessment*

(b) *Comprehensive Site Inspection / Topographical Survey*
Visual inspection of the entire site; examination of available exposures such as geological test pits (or records) and recently cut field ditches; presented in a standardised output

(c) *Documentary Research*
Examination of available maps and other documentary sources (printed and manuscript), and other relevant background material relating to the site and its environs (such as field names), either to assess potential for additional **full** research on specific issues, or to carry it out at that stage.

(d) *Aerial photography / survey*
Examination and plotting of all relevant photographs for the site and its environs; commissioning any new photography

(e) *Earthwork survey*
Survey of earthworks in pasture; detection and planning of residual earthworks in arable and woodland

(f) *Assessment of artefact content of topsoil*
This will involve measuring the surface distribution of artefacts through collection by some or all of these techniques, taking account of prevailing ground conditions,
(i) general line walking of all / part of the site
(ii) detailed collection on part of the site
(iii) sampling of soil from trial trenching

(g) *Geophysical prospection / ground radar*
With appropriate methodology according to ground conditions; and a sampling strategy based on the type of information to be gathered

(h) *Trial trenching / auguring / boreholes*
A programme of hand-dug / machine cut and hand cleaned trial trenching; appropriate locations and proportions of the whole development site should be based on information accumulated from previous activities; areas of no known archaeology should not necessarily be ignored; positioning and sampling strategy may need to be defined in agreement with the planning archaeologist.

(i) *Volumetric sampling of test pits for artefacts*

(j) *Palaeoenvironmental assessment*
For which a detailed and site-specific design will be required.

7 Methods

7.1 The proposed methodologies for the investigative techniques listed above must be validated by the planning archaeologist. They can be expressed

(a) either in association with each specified technique as relevant
(b) or through a set of standard statements provided separately by the planning archaeologist as required policy for work in the area in question, to which archaeological contractors are expected to adhere
(c) or through standard statements about techniques provided by the contractor and approved by the planning archaeologist.

7.2 A projected *timetable* must be agreed for the various stages of work, so that provision can be made for monitoring.

7.3 *Staff structure,* including specialist sub-contractors, must be agreed, through a list of key project staff with qualifications and experience. IF A membership together with IF A's Codes of Conduct and formally adopted guidelines are yardsticks of competence and good operating practice. Consequently it is normally prudent to disallow the use of unwaged staff as likely to affect standards adversely (but see appendix E viii, E ix).

7.4 *Health and Safety* matters (including site security) must be primarily a matter for the contractor. However, in the name of general responsibility and for the protection of the planning archaeologist as task monitor, it is reasonable to require evidence of conformity to the Health and Safety at Work Act.

7.5 *Field Survey techniques* can be specified or approved so that there is compatibility with other work carried out in the area, as long as this pays due regard to the needs of the particular project. Matters to be covered can include:

(a) earthwork survey: level of recording - sketch, identification, analytical; scales and conventions (hachure / contour)
(b) standards and protocols for use of metal detectors
(c) transect and collection intervals for general and detailed fieldwalking
(d) standards of representation (including scales) for results of general reconnaissance, plotting of aerial photographs, geophysical prospection, etcetera.
(e) methods for preparing fieldwalking statistics in order to maintain consistency within an area
(f) *pro formae* for outputs from structured walkovers.

7.6 *Excavation* is a potentially destructive evaluation technique. The brief should ensure clear and enforceable guidelines for work on machine-opened trial trenches, such as:

(a) An appropriate machine must be used, with an appropriate bucket, usually a wide toothless ditching blade. Choice should be influenced by prevailing site conditions, and the machine must be able to carry out a clean job.

(b) All machine work must be carried out under the direct supervision of an archaeologist.

(c) All topsoil or recent overburden must be removed down to the first significant archaeological horizon in successive level spits. The continued use of machinery beyond this point should only take place when specifically agreed with the planning archaeologist as necessary for the particular type of evaluation.

(d) The top of the first significant archaeological horizon may be cleared by the machine, but must then be cleaned by hand and inspected for features.

(e) Sufficient of the archaeological features and deposits identified must be excavated by hand through a specified or agreed sampling procedure to enable their date, nature, extent and condition to be described. No archaeological deposits should be entirely removed unless this is unavoidable. It is not necessarily expected that all trial trenches will be fully excavated to natural subsoil, but the depth of archaeological deposits across the whole site must be assessed. The stratigraphy of all trial trenches should be recorded even where no archaeological deposits have been identified.

(f) All excavation, both by machine and by hand, must be undertaken with a view to avoiding damage to any archaeological features or deposits which appear to be worthy of preservation in situ.

(g) Any human remains which are encountered must initially be left in situ. If removal is necessary this must comply with relevant Home Office regulations.

7.7 *Recording systems* must be specified or approved. The format of recording forms is less important than the existence of relevant fields. Matters for consideration include:

(a) structure for site record and media to be used with special reference to archival curation needs

(b) recording forms *I* context sheets

(c) plans, sections / profiles of significant contexts and scales
(d) photographic formats and coverage
(e) finds collection policies
(f) finds recording systems, including bulk processing arrangements and immediate conservation arrangements for 'small' finds. For these, reference should be made to the IFA Guidelines for Finds Work.
(g) environmental sampling strategies

7.8 Where records or material needing further work are generated, *post-field requirements* can be specified or approved, covering matters such as:
(a) assessment of potential for reporting and further analysis
(b) preparation of the archive of field records and material, including measures for security, packaging and conservation
(c) archive deposition.

7.9 A standard variation clause will allow the specification to be varied by agreement in response to significant discoveries during the evaluation process.

8 Monitoring Arrangements

8.1 This will state the need for arrangements to monitor the progress and effectiveness of the evaluation to ensure proper execution of the specification and therefore conformity to the brief. The arrangements will include an agreement of stages at which monitoring is appropriate and indicate the possibility of random inspection. If not provided for elsewhere, they will indicate how the monitoring of a phased programme will allow agreement on the results of a previous phase to trigger the design and commencement of the subsequent one.

8.2 Any officially approved rates of cost per visit to be charged for monitoring should be stated so that the applicant / developer will be aware of the need to make financial provision.

9 Reporting Requirements

9.1 For many evaluation projects the preparation of a report will be relatively simple, following on directly from the fieldwork and achieved within a standard format. The Brief will ensure that reporting conforms to general requirements on content and format.

9.2 For more extensive and complicated evaluation projects, the procedures outlined in English Heritage's Management of Archaeological Projects 2nd Edition 1991 (MAP2) should be followed for immediate post-field archive preparation and initial assessment. Agreement can then be reached about what aspects need to be taken forward to provide a report in the required format containing the information needed for planning purposes.

9.3 The general requirements on content and format will cover:

(a) the components and general level of detailed information and illustration for the report: normally these should include
- (i) plans of trenches and features
- (ii) tables summarising features and artefacts by trench together with their interpretation
- (iii) plans of actual deposits, and, where appropriate, extrapolated to indicate potential deposits

(b) consideration of evidence within the wider landscape setting

(c) whether details and styles can be determined by the contractor; any need to conform to established local systems or formats for local publications

(d) any requirement for a critical review of the effectiveness of the methodology to provide a confidence rating for the results

(e) any requirement for a separate interpretation of the significance of the results, in archaeological or planning terms, and in what format

(f) any recommendations for further evaluation if necessary

(g) any timescale for report production so that it can meet development control deadlines.

10 Archive Deposition

10.1 This will ensure that the results of the evaluation, the site archive (records and any materials recovered) will be placed in a suitable form in a registered museum within an agreed timetable. The planning archaeologist should indicate the availability to contractors of guidelines prepared by potential recipient bodies, including full explanation of the legal situation regarding finds, so that any requirements for security copying and storage grants are taken into account when estimates are prepared. It is appropriate to recommend that archives be prepared in accordance with established guidelines (UKIC 1990, MGC 1992).

10.2 Consideration should be given to the following points:

(a) content and format of archive: this should be prepared to the minimum acceptable standard defined in MAP2 (5.4 & Appendix 3). The integrity of the archive should be maintained.

(b) ownership of material: every effort should be made to ensure transfer of ownership to an appropriate museum; if it is to remain with the landowner, provision should be made for a full record of the material

(c) repository: in some circumstances this may be indicated in the Brief; the Specification should summarise the agreement with the appropriate repository.

(d) submission of a summary report and details of archive deposition to the SMR and the NMR

(e) expected time limits for deposition of archive.

11 Publication & Dissemination

This will indicate requirements for public availability of the evaluation report at a given interval after production (usually a maximum of 6 months) through the SMR, NMR and any other standard local source such as the local registered museum. It should also deal with publication requirements if no further work is envisaged. These, which may have a cost implication, at the minimum require the submission of a summary of results to the local County Journal or equivalent publication, including one-line reports on work done with negative results.

12 Other Factors

This will indicate any other factors relevant to the applicant or potential contractors.

Appendix

A The Importance of Explaining Purpose

(i) The requirement for evaluation must be substantiated and expressed in sufficiently robust terms and in sufficient detail to resist challenge on archaeological and legal grounds.

(ii) The complexities of procedure and methodology for evaluation can easily distract attention from the reasons for doing it. It is important to stress the basic purpose in seeking to conserve the heritage, namely to improve understanding of a finite and non-renewable cultural resource that can serve a wide range of social uses, now and in the future.

(iii) Clarity about the detailed requirements for a properly conducted process of evaluation is equally important. Applicants need to know what the local planning authority's archaeological adviser considers sufficient for the purpose, and will want to quantify the costs to their development. Applicants and their consultants need to be aware of the stages and processes involved. Archaeological organisations tendering for contracts to produce the information also need to be clear about requirements.

B Initial Appraisal

(i) PPG 16 (para 19) which discusses early consultations between developer and local planning authority, provides the framework for the first stage of archaeological work in the development process. This will require reference to the SMR, and, if not already cross-referenced, to the records of the local museum together with a brief check of the main published literature, and normally a site visit. It can be done by the planning archaeologist in response to a preliminary enquiry or a submitted application, or by an applicant's consultant as part of a preliminary enquiry discussed with the planning archaeologist.

(ii) The objective is to provide an informed answer to the question whether there is an archaeological dimension to be considered in the determination of any application, and whether this needs to be clarified through further investigation. A positive answer will lead to a Brief and Specification for the next stage, the Assessment, or, in simpler cases, lead straight into it.

(iii) Appraisals will need careful consideration by the planning archaeologist, especially when offered by the applicant, if the Sites and Monuments Record is relatively underdeveloped. Some assessment work may have to be undertaken as a matter of routine: this would apply if aerial photographic holdings were not up to date and sketch plotted, and if no systematic survey of historical map documentation had been undertaken. This may also apply to large area sites where nothing in particular is known or no adjacent sensitivities have been identified.

C Assessment

(i) This will review and validate what has already been noted in the Appraisal, and supplement it with any other available material. It is essentially a desk-top study with a relatively small non-intensive field component. In smaller cases it may follow from and form part of the planning archaeologist's Appraisal. In larger scale cases it may be undertaken or commissioned by the developer's consultant for validation by the planning archaeologist.

(ii) The objective of Assessment is to see whether there is sufficient information to enable the local planning authority to consider properly the proposal's archaeological implications, and, if not, whether further information can reasonably be required through implementing a designed Field Evaluation. In already well-documented areas no further work may be necessary. It also has the potential, if carried out at the right stage in the design of proposals, to influence them so that archaeological impact is minimised.

(iii) Larger scale Assessments will require their own Brief and Specification. These will indicate the types of sources relevant to the case. They are likely to include the SMR, aerial photographs from all sources, relevant Museums, the County Record Office and local history collections, historical maps (from which a map regression exercise may be required), local experts and societies, an extensive visual inspection of the site, and, for urban sites, collection of information on basements.

(iv) The product of the Assessment will be a report that:
- (a) assembles, summarises and orders the available evidence
- (b) synthesises it and places it in the local and / or regional context
- (c) comments on its quality and reliability and indicates how it might need to be supplemented by Field Evaluation to provide the information required for planning purposes.

(v) The Assessment ought to provide a basis for indicating whether further work will need to involve land adjacent to the application site.

D Field Evaluation - Brief and Specification

(i) The Appraisal/Assessment is the basis for a brief which must:
- (a) indicate what further information is likely to be required to evaluate the archaeological dimension for planning purposes
- (b) provide an outline methods statement covering the means of obtaining it, listing relevant activities

(ii) The Brief will be prepared by the planning archaeologist or, exceptionally, drafted by an applicant's consultant for approval by the planning archaeologist. There should always be scope for dialogue over its content between the planning archaeologist and a consultant or contractor. Use of a model brief is strongly recommended for tailoring to particular circumstances, and as guidance for others. This will provide opportunities for ensuring that county policies for the historic environment and local knowledge are taken fully into account. The brief must provide the framework for a more precise specification of work, which is the mechanism for

(a) ensuring that the required information will actually be produced
(b) allowing the applicant to estimate the likely costs
(c) providing a basis for 'level-playing-field' tendering by contractors.

(iii) The Specification will elaborate how the methods outlined in the brief are to be applied. From the viewpoint of the planning archaeologist, clarity about methodology is needed to ensure the specification is capable of producing the information that is required, and with minimum impact upon the archaeological resource. This ought not to be confused with the role of specifications in regulating client - contractor relationships, though there will inevitably be a considerable overlap between the two. The ultimate test of a specification is that it is sufficiently detailed and precise to ensure that the effectiveness and quality of work by a contractor selected through competition on price can be verified by the planning archaeologist.

(iv) There is a range of opinion and practice about the responsibility for writing specifications.

(a) Some regard this as part of the curatorial function insofar as it is a means of safeguarding the archaeology of a locality and ensuring a level playing-field for competing contractors. This approach depends upon the production of specifications having an economy and effectiveness that will be acceptable to the applicant.
(b) Others feel the writing of specifications is a matter for the contractor, either on principle, or because they lack the resources to do it themselves. This means that specifications written by a consultant or a contractor need to be approved by the planning archaeologist for commendation to the local planning authority, in response to a brief. That may require negotiation on technical matters, which may prove difficult with a contractor already selected competitively and on the basis on an unapproved specification.

(v) Many planning archaeologists currently prefer, in smaller scale cases, to combine the brief, outline methods statement and detailed specification for evaluation work in the same document. This ought to be organised clearly into sections to facilitate and clarify any necessary discussion between the parties involved about the various stages of work.

(vi) The term 'Project Design' is sometimes used in the context of briefs and specifications. Its current primary derivation is from English Heritage's MAP2, which is concerned with archaeological research projects *per se*, rather than as components of the development process. It is likely to be most relevant to exceptionally large-scale evaluations and to post-consent recording projects. Here, when required of contractors, the Project Design provides an opportunity to assess the quality of their response to the brief. It also facilitates the conduct of such work within the framework of MAP2 with its inbuilt review procedures.

(vii) The planning archaeologist needs to ensure that the recording system to be used by a contractor will be generally applicable to the task in hand, by reference to a known standard or by verification of a proposed system. It need not mean conformity to a particular field recording system or sheet, providing what is used contains the required fields of information. Methods statements in specifications can require reporting of fieldwork results in terms of established local databases for finds and structures (see I below). This requirement will be relatively undemanding in evaluations which generally locate and characterise archaeological deposits rather than excavate them extensively.

E Field Evaluation - Implementing and Monitoring

(i) The specification must provide for notification of the planning archaeologist when the contractor commences, and at the start of agreed stages thereafter. The planning archaeologist must be prepared to make spot visits to fieldwork in progress, in order to

- (a) ensure that the specified work is being carried out properly, in relation to securing the required information with minimal intervention (but not policing any contractual arrangements between applicant, consultant and contractor)
- (b) agree with the applicant and his contractor any proposals for amending the specification in the light of emerging results
- (c) acquire familiarity with the field situation about which recommendations will have to be made to the local planning authority.

(ii) Problems may arise, especially in larger and more sensitive evaluation schemes, where the applicant employs a consultant who has a significant input to the preparation of the brief issued by the planning archaeologist, and perhaps writes the specification. Monitoring of fieldwork by the planning archaeologist may be resisted on the grounds that the consultant is capable of providing quality control and the applicant will decide when to give the required information to the planning archaeologist as adviser to the local planning authority. In such circumstances it must be made clear that the planning archaeologist needs not only to have the required information but also to see the methods through which it has been obtained. Model briefs and specifications will facilitate this process, but in the final analysis it is reasonable for the local planning authority to require facilities for monitoring the applicant's contractor. Not least, it will help discussion between the planning archaeologist and the consultant and / or contractor on the implications of unexpected discoveries for extra work, or absences for reduced work.

(iii) The need to monitor compliance extends to all types of fieldwork

- (a) It is particularly important in fieldwalking to ensure conformity to the transect plan and collecting strategy.
- (b) The implementation of necessary data -enhancement techniques for remote sensing survey output needs to be ensured.
- (c) Test pitting or trial trenching by machinery must demonstrably avoid under- and over-digging, and there will need to be arrangements for agreeing what is a 'significant archaeological deposit' and a 'deposit worthy of preservation' (7.6 above). Machining of some types of archaeological deposits can be justified exceptionally but under no circumstances should

the machine be used to cut arbitrary trenches down to natural deposits. Machining down to natural subsoil, for example through deep ditches to obtain a section, should not be undertaken unless specifically agreed.

(iv) Monitoring must be properly documented and a standard form is recommended. This will help deal with situations

(a) where the information may have to be rejected as inadequate due to shortcomings in implementing the agreed specification

(b) where the interpretation of the evidence becomes a key issue in a Public Inquiry into a refusal of consent for an archaeological reason

(c) where monitoring of fieldwork recording required by a condition on a consent shows serious deficiencies, and evidence may be needed to support formal enforcement proceedings or even a prosecution.

(v) Planning archaeologists must ensure that they possess, or have access to, the kind of technical skills needed to monitor fieldwork (and post-fieldwork) effectively. Generalised indicators may provide a foundation for monitoring, such as contractors'

(a) membership of IF A bringing with it personal adherence to the IF A Byelaw Code of Approved Practice for the Regulation of Contractual Arrangements in Field Archaeology.

(b) adherence to a locally adopted manual of procedures or to one offered and validated.

(vi) Monitoring is not deemed to have been completed before the archive has been deposited and a suitable report or publication agreed.

(vii) It must be remembered that clear examples of non -compliance by a contractor need communicating by the planning archaeologist to an applicant or his consultant within a reasonable time in order to safeguard against liability claims.

(viii) The use of local societies in development-related fieldwork raises complex issues on which there is a range of views. On the one hand it is difficult to see how this can be achieved realistically in most cases given the time constraints, technical problems and confidentiality associated with commercially commissioned evaluation work. On the other hand, some experienced groups have demonstrated competence in smaller scale evaluation or recording work whose commercial cost might also be burdensome to many private individuals, such as small house extensions in areas of general sensitivity. Additionally, some societies possess local knowledge of a kind that does not easily find its way into site-specific SMRs and ought to be consulted in appropriate circumstances by those involved in the archaeology of the development process. Whether or not local societies become involved in this kind of work, its controlling framework must always be properly drafted briefs and specifications, their effective monitoring, and the IFA Codes of Conduct (IF A 1986, 1990). All organisations carrying out work in the context of development must be able to meet timetables and quality standards.

(ix) Those Codes explicitly exclude the use of volunteers as a cheap substitute for skilled professional staff or the use of unemployed professionals on a voluntary basis. However, there may be scope for the use of 'traditional' volunteers on development-related excavations with a training element having developer sponsorship specifically for that purpose, providing the voluntary / training element is ancillary to the core project staffing, and properly supervised.

F Field Evaluation: Production of Report

(i) Reporting arrangements for fieldwork evaluations will need to form part of the brief and / or specification. The purpose of the report is to provide information which will enable a planning application to be determined by the local planning authority.

(ii) The fieldwork will have been commissioned by the applicant, so the report is the applicant's, as the means of providing the required information, however much the planning archaeologist may have been involved in earlier discussions. The report is therefore initially a private document to the applicant from his contractor who also needs to be able to give independent advice to his client, initially at least on a confidential basis. In cases of commercial sensitivity where the applicant is also using a local authority based contractor, the planning archaeologist must not seek or obtain information prematurely before the formulation of report and recommendations, except through agreed monitoring procedures.

(iii) In some circumstances a programme of evaluation may, in answering the questions posed, also raise others. Every attempt should be made to deal with the problem by agreed modification of the specification while fieldwork is in progress. There is a case for evaluation specifications containing a standard variation clause providing a contingency arrangement for extra machining, trial trenching or geophysics to answer particular problems which arise during fieldwork. These can be closely specified, costed and controlled. Where this is not possible for logistical reasons, or the applicant is unwilling, the necessary further evaluation must be strongly recommended to the local planning authority. If the case is clear enough, and clearly documented, failure to respond will justify a recommendation of refusal on grounds of insufficient information.

(iv) The information provided by an evaluation will ultimately be deposited in the SMR and may also be fed into other local and national data systems. This will be ensured through the terms of the specification. However, the commercial sensitivity of information about archaeological constraints on land which applicants are competing to acquire for development can cause problems.

(a) An applicant will not want to make it available to competitors, either at all or free of charge, yet this ought not to keep it out of the public domain indefinitely. There should be a standard requirement for deposit in a public archive within 6 months of notification of results to the LP A. In any case, the evaluation information provided in support of a planning application will be a public document as a committee background paper.

(b) Of more concern is the scenario of several developers wishing to evaluate a site independently, making a cumulative impact on its archaeology. The planning archaeologist may be justified in asking the vendor to provide a single generally available evaluation whose cost would be passed on to the eventual purchaser.

(c) Deposition of an archive in a registered museum automatically places it unconditionally in the public domain.

G Making Assessments and Evaluations of Value for Preservation

(i) Ultimately the planning archaeologist has to form a view of the significance of the results from assessment and / or evaluation so that a recommendation can be made to the District or County Planning Officer.

(ii) It is good practice to ensure specifications address this issue explicitly, *either* by debarring such expressions of view entirely from a contractor's report, *or* by requiring it in a separate statement which may in turn be linked to recommendations for further work.

(iii) Planning archaeologists seeking the latter must bear in mind the potential interest of the contractor, though both are expected to work to a presumption in favour of preservation. The Secretary of State's non-statutory criteria for scheduling in PPG 16 Annex IV provide a general method for assessing the importance of what has been discovered.

(iv) The synthesis which is a key factor in assessing importance for preservation can be more easily provided by an established local contractor than by a non-local one. There will need to be careful monitoring to ensure that locally important sites are not devalued by non-local contractors who may lack the time or inclination to do the necessary research.

H Evaluations and Full Recording Projects

(i) The advice offered in this document is primarily concerned with pre-consent evaluations. The planning process also regulates field recording carried out as a condition of a consent. The larger scale and greater intensity of such work may impose extra regulatory burdens and raise other procedural issues, but the overall process will be similar.

(ii) The reason for the recording action and its objectives must be spelt out in a brief which draws upon any evaluation results and outlines the broad methods to be adopted. The implementation of that brief will need to be specified at a level of detail which permits monitoring and control of works by the planning archaeologist. The brief ought to provide or require the equivalent of a Project Design.

(iii) Reporting procedures will need attention, bearing in mind the common misconception amongst developers that their enforceable responsibilities end with the actual fieldwork. As far as possible, the approach advocated in English Heritage's MAP2 should be followed. It represents the best available approach to estimating total project costs (and therefore developer liabilities), and a reasonable guarantee of securing the minimum necessary post-excavation programme to report results adequately.

(iv) Monitoring compliance in the post-consent phase of archaeological work may present difficulties. For large and complex recording projects it may be beyond the capabilities or resources of the planning archaeologist. In such cases it is essential to devise verifiable mechanisms of inspection and control, whether by agreement with the developer's consultant or by using a consultant hired by the local planning authority.

(v) Compliance also covers the implementation of development, to ensure that agreed measures for preservation are properly implemented, and that no unplanned destructive ground works take place.

I Post-Excavation Work: Reporting into Local Systems

(i) It is reasonable to ensure through requiring particular methods in specifications that the output of fieldwork is in a format conforming to existing local data systems. The principle is already established by requirements for report to the SMR and deposit in the local Museum.

(ii) The purpose of such requirements is to ensure that the data recovered are presented in formats which will facilitate comparison and synthesis without the need for a further stage of basic data preparation after the developer's obligations have been discharged. This presupposes the existence of local systems for storing data on ceramics, other finds, structures etcetera, (in addition to the SMR).

(iii) Recipient systems for data storage will have to be devised with sufficient simplicity, breadth and flexibility to be readily acceptable to contractors. They must be generally compatible with the most widely used field recording systems and be capable of dynamic response to new information rather than act as interpretative straight-jackets.

(iv) Such systems will be maintained as part of the local archaeological provision. Input to them will need to be seen as part of the reporting process, to be undertaken by either the developer's contractor or by the maintainers of the systems as sub-contractors. Project estimation must allow for both data preparation and data inputting.

J Post Excavation Work: Reporting and Synthesis *I* Research

(i) The developer's obligations for post-fieldwork analysis include reporting into the public domain. It will be reasonable to require considered comment on how the results relate to the archaeological reasons for undertaking the work, especially if those reasons were originally expressed in terms of a research framework for the project.

(ii) If the requirements of PPG 16 are not to be challenged as unduly onerous, restraint must be exercised in seeking full research-based synthesis for what has been presented and justified as a rather simpler recording exercise. This is not to make an artificial distinction between the recording process and the academic considerations which ought always to inform it, but to try and draw a line between basic and further research, a boundary likely to vary from case to case.

(iii) On the other hand, the risk inherent in over-restraint of the research element is that data recovery will be more readily portrayed as rubbish collection, despised by 'real' archaeologists and incomprehensible to the wider public (including the developers) in whose name it is being done. The risk is exacerbated by the nature of evaluations which tend to identify and characterise the presence of archaeological evidence, without subjecting it to any destructive analysis.

K Services combining roles for Planning Advice and Fieldwork Implementation

(i) Local authority archaeologists who have managerial responsibility for a service with separate functions for planning and fieldwork need to approach the issues discussed above openly, and with care. Distinguishing the two roles is essential for a process which is usually development-driven and developer-funded, in order to minimise the risk of conflicts of financial interest. English Heritage urges that daylight be visible between the two functions. In concurring, ACAO also urges that sight must not be lost of the basic purpose behind conservation archaeology, to increase understanding of the local historic environment.

(ii) That basic purpose depends upon local organisations of sufficient minimum critical mass to cover the range of subjects and tasks in the locality. In the sizes of localities now existing and likely to be produced by the local government review, that coverage may in practice not be obtainable in some places without a size of organisation that incorporates both roles. In such cases the local authority managing archaeologist will need to identify carefully the financially sensitive stages of archaeological involvement in the development process. In appraising the impact of a development proposal upon types of evidence, the planning archaeologist ought to be able to seek the academic advice of fieldwork colleagues, and also in drawing up particular briefs and specifications where expert detailed local knowledge can be an important consideration. Planning archaeologists however will always assimilate acquired information from whatever source in order to be able to offer independent planning advice.

(iii) In situations where one part of a service can undertake work arising from the advice of the other part, planning archaeologists must have explicit systems of internal monitoring appropriate to local circumstances, in addition to any operated by a developer's consultant. This would involve peer group review either between parts of the service or within the fieldwork organisation. It is essential that such systems

(a) are agreed with an applicant's agent or consultant before fieldwork begins
(b) and are sufficiently robust to withstand challenges of fieldwork results or planning recommendations.

L Manuals and Model Statements

(i) Manuals of procedures and model statements can clarify publicly what is generally required within the area of a local planning authority. They can also facilitate separation of roles in bilateral services and ameliorate some difficulties associated with competitive tendering.

(ii) Planning archaeologists are advised to produce model versions of briefs, specifications and methods statements which will provide a 'level playing field' for potentially competitive contractors. The development of such documents and their citation in briefs will allow those planning archaeologists who wish to retain an involvement in the drafting of specifications to withdraw from the most detailed levels.

(iii) In an area with a bilateral service, for the planning archaeologist to require that specifications conform with the local procedures manual may appear to give the local fieldwork arm a competitively 'unfair' advantage, but in practice a good manual will actually help level the playing field for the archaeology. An effective manual of procedures will reflect common practices familiar to competent professional units.

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