

Report Template: Background

1. The planning policy and guidance context

The current relevant national planning policy and guidance for archaeological evaluations and watching briefs are contained within the NPPF (National Planning Policy Framework 2019), NPPG (National Planning Practice Guide) and GPAs (Historic England Good Practice Advice Notes).

The following NPPF paragraphs provide the high-level policy context and justification for pre-determination evaluation and watching brief reports:

189: *In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment **and, where necessary, a field evaluation***

199: *Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible (64 Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository)*

Not surprisingly perhaps, the NPPF, NPPG and the GPAs do not contain any specific reference to reporting in respect of archaeological evaluation or watching briefs. However, both the NPPF and NPPG do contain important general references to ClfA Standards and Guidance. The GPA2 (which is theoretically the national document that sits directly above the ClfA S&G in terms of planning hierarchy) also contains a number of references to ClfA Standards and Guidance including the S & G for evaluation on page 4, and a reference list to all the relevant ClfA S&G (including evaluation and watching briefs) on page 10. Paragraphs 38-43 also deal generally with post-excavation, publication and archiving. They provide important national guidance on these subjects but are not directly relevant to evaluation and watching brief reports per-se except in respect of any post excavation analysis and archiving that may be necessary.

In summary therefore, the ClfA S&Gs for Archaeological Evaluation and Watching Briefs currently provide the only national reference to the reports generated by these archaeological processes. They are therefore the only national means to regulate, guide or advise local authority archaeologists, contractors, and consultants on the content of reports.

2. The case for updating and expanding the sections of the ClfA S&Gs for archaeological evaluation and watching briefs that deal with reporting

2.1 The significance of evaluation and watching brief reports

Evaluation reports

Evaluation reports constitute a relatively distinct type of grey literature. They are a largely post PPG 16 phenomena, developed mainly in response to the then new policy support for the protection of

archaeology as a material planning consideration and for evaluation to be undertaken before planning permission is decided. They are also arguably the most important output of the planning and archaeology process: an essential requirement for planners, developers and archaeologists to assess the likely impact of development where the conservation or protection of archaeology is a planning issue. They also provide an important source of archaeological information about sites; and with post excavation assessments are crucial in determining the archaeological outcomes of development projects.

A defining characteristic of almost all pre-determination evaluation reports is that in addition to archaeological objectives and questions they also address planning questions and objectives. These can for instance include: *“will the archaeology influence the planning decision, or will its cost make the development less viable?”* Post-determination archaeological evaluation is also influential for developments and in terms of questions related to their cost and timetable.

Watching-brief reports

Grey literature reports of archaeological watching briefs undertaken as archaeological mitigation are often regarded as a poor relation/the least important grey literature reports. However, such reports frequently provide the only evidence for archaeological sites/features on a development site, and only a small percentage of watching-briefs that reveal important archaeology (and which can be the only evidence of the site), are published or go through the formal process of PXA. The quality of the grey literature report is therefore often important for understanding the site in perpetuity.

2.2 Evidence from research projects for the need to improve the quality of grey literature including evaluation and watching-brief reports

Recent regional and national research projects including the Upper Thames Valley mapping project, Fields of Britannia, EngLalD, the Roman Rural Settlement Project have identified issues with the quality of grey literature.

Several methodological issues have been identified that relate to fieldwork practice, post-excavation analysis and the content of reports - both published and grey literature. The following are examples of issues that are relatively straightforward, and which apply to evaluation reports:

- The absence of important information about surveys undertaken and the sampling techniques used.
- Inaccurate reporting of the geographical location of sites resulting in their miss-location.
- The need to improve the use of historic mapping to identify the presence of medieval and post-medieval linear boundaries.
- The difficulty of locating and plotting evaluation trenches from pdf reports
- Remedying the lack of consistency in finds illustration.

2.3 Potential benefits of improving the report section of evaluation and watching brief S&G

The ease of monitoring, enforcement and assessing the impact of changes made to the S&G

- Several of the methodological quality measure identified (e.g. locational data, illustration, recoding of all surveys undertaken) are potentially capable of being specified within a WSI and, if necessary, can then be monitored as part of the content of the evaluation report.
- Local authority monitoring of compliance with requirements specified in a WSI are quicker and easier to do from a report alone than by visiting the evaluation/watching brief in the field or at

the post-excavation stage. Any new requirements that can be effectively monitored via a report are therefore theoretically much less likely add to the burden of local authority services.

- Changes to the report section of S&Gs could also mean that it will be possible in future to assess the impact of such changes on the quality of reports. This should in theory require less resources than is the case for fieldwork or post-excavation, and some machine monitoring could also be possible (e.g. for locational data).

Improving the quality and accessibility could be beneficial more widely for archaeology within the planning and development system

It has been mentioned above that pre-determination evaluation reports are often important to developers and planners as well as archaeologists. They are also the archaeological reports most likely to be read by planners and developers, and by local people and communities who are interested in the impact that archaeology will have on a proposed development. Evaluation reports are therefore the route through which most non-archaeological professionals and local communities can engage with archaeology as a written medium.

For example, improving the quality of information about the location of evaluations including trial trenches and other interventions will significantly enhance the quality and accessibility of reports and their usefulness for research and conservation.

Improving archaeological knowledge.

A significant minority of pre-determination archaeological evaluations (c10-20%) are not followed by further investigation for up to 5-10 years - if ever - a proportion that is relatively higher for large developments. Such reports are often archaeologically valuable as they often cover very large areas and contain significant evidence, including of newly discovered sites. The quality of the evidence within the report is therefore potentially a very important factor in their value for research and informing advice on other planning proposals. Improving the issues identified by the RRSP could therefore have a positive impact on the archaeological knowledge of such evaluations in the future.

An enhancement of the status of evaluation reports

Currently, evaluation reports are included in the broad, relatively amorphous category of 'grey literature'. Their relatively special status in terms of archaeological fieldwork is recognised by the production of the ClfA S&G, but the key output which is the evaluation report itself does not have a specific identity and it is probably fair to state that the overall quality of these reports is relatively poor in comparison with peer-reviewed, published reports, especially with respect to post excavation analysis and reporting.

The importance of evaluation reports for the current planning system has been mentioned above. In addition, evaluation reports could be a showcase for the successful application of new and innovative techniques that have direct implication for planning and development. A recognition of the special and unique status and importance of evaluation reports – and as part of this implementing measures to improve their quality - could therefore be helpful for the reputation of development-led archaeology both within and outside of the sector.