CHAPTER 2

PLANNING, COMMERCIAL ARCHAEOLOGY AND THE STUDY OF ROMAN TOWNS IN ENGLAND

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INTRODUCTION

Widespread urbanism was one of the Roman Empire's biggest contributions to life in Britain, and also to the archaeological heritage. In addition to the major public towns of the province there were also a large number of 'small towns', a category which encompasses much diversity and which lies outside of the scope of the present volume. Because of the monumental character of some Roman urban remains (some still standing above the ground even today, others easily recognised during building work), the abundance of durable artefacts, and interest from the Renaissance onwards in Classical civilisation, the archaeological study of Roman towns in Britain has had a long and distinguished history. Many of the major Roman towns subsequently became important urban centres in Saxon and medieval times, down to the present day (e.g. many of the English cathedral cities). As a result, the archaeological study of Roman towns in Britain has been closely tied up with the question of archaeological responses to new development in urban contexts: urban archaeological resource management, as we might call it nowadays. Roman origins have also frequently had a strong impact on the later construction of civic identity, including through local museums.

Archaeological resource management involves a wide variety of activities: identification, making inventories, assessing value, affording protection (e.g. by designation, such as scheduling), measures to conserve and maintain fabric, presentation to the public, and investigation, including work done in advance of planned new developments. Planning Policy Guidance Note 16 (PPG 16), *Archaeology and Planning*, was published in 1990, and had a profound effect on archaeology in England, including resulting in a system of commercial archaeology. This paper will examine the impact of PPG 16 (and its successor policies: Planning Policy Statement 5 (PPS 5), *Planning for the Historic Environment*, published in 2010, and the *National Planning Policy Framework* (NPPF), published in 2012) on our knowledge of the major Roman towns of England (DoE 1990; DCLG 2010; DCLG 2012).

The character and quality of archaeological information and understanding generated at any given time are profoundly affected by the circumstances and conditions under which the work takes place, and by the archaeological approaches which are pursued at the time; the two factors are of course closely related. This has been as true since 1990 as it was before. This paper will therefore consider especially how the arrangements for 'commercial archaeology' in England have affected the nature and overall characteristics of the work undertaken in the major Roman towns since 1990.

By way of context, it is worth considering the larger Roman towns against the wider background of Roman settlements in Britain. It has been estimated that there may be some 100,000 'non-villa' Roman rural settlements in England, and perhaps 2,000 villas (Mattingly 2006, 370). By contrast, there are only around 15 *civitas* capitals, four *coloniae* and one provincial capital

(Millett 1990, 102, table 4.4). 'Rarity' is one of the non-statutory criteria by which monuments are assessed for 'national importance' (which enables them to be scheduled under the ancient monuments legislation) (DCMS 2013, 10). It follows from this that all the major Roman towns in England have a good claim to be considered as monuments of national importance in their entirety. In the case of sites which are now 'greenfield' land, such as Wroxeter and Silchester, this has been recognised by the scheduling of the entire area as a single monument. Clearly, scheduling the entire historic core of a modern, living, town or city would be entirely impractical, but this does not detract from the importance of the area. Of course, the Roman archaeology of, say, Winchester is less well-preserved than that of somewhere like Silchester, which is now a greenfield site, but this is counter-balanced by the presence of remains of other periods (Saxon, medieval, post-medieval) and the long overall sequence of occupation on a single site.

A BRIEF HISTORY

The history of archaeological engagement with Roman towns in England can be divided into four main phases. First, from the eighteenth century onwards, was a phase of antiquarian interest. This was initially very much *ad hoc*, although considerable public interest was sometimes aroused by discoveries (e.g. the 'Hunting Dogs' mosaic found in Cirencester in 1849 and reported in the *Illustrated London News*: Darvill and Gerrard 1994, 20 and fig. 3). Rather more systematic activity began in the later nineteenth century, such as the observations made when Canterbury's new sewerage system was installed in the 1860s or the discovery of a Roman ship at County Hall, London, in 1910 (Pilbrow 1871; Marsden 1965).

The second phase began after the Second World War. From the early 1950s, work was carried out in advance of reconstruction on bomb-sites in cities such as Canterbury and London. This work was generally under the auspices of archaeologists from local museums or locally established excavation committees. The most remarkable Roman discovery of this time was Professor W.F. Grimes' unearthing of the Temple of Mithras on a building site near Cannon Street in the City of London in 1954. This aroused huge public interest, and also occasioned considerable embarrassment for the government, as construction work was delayed. Eventually the temple's foundations were rebuilt on a plinth above street level (Shepherd 1998).

This kind of work gathered pace in the 1960s, with important excavations in Winchester, Cirencester and elsewhere. Some of these were funded by the central government predecessors of English Heritage, but the work was generally carried out by freelance excavators or local excavation committees. As urban redevelopment gathered pace, there were also some serious losses, such as the 12 ft high masonry walls of the legionary bath-house in Chester destroyed in 1968 (Jones 1984, 3, fig. 1). Episodes like this helped to stimulate the formation of the archaeological pressure group RESCUE, which led to a major increase in government funding for 'rescue archaeology'. This period saw the establishment of some of the archaeological 'units' (full-time professional teams, covering a particular geographical area) which were to dominate rescue archaeology until 1990. Some of these were based in former Roman cities such as Canterbury, Chester, Exeter, Lincoln and York (Jones 1984).

From 1973, the Department of the Environment began providing annual block grants for such bodies, so that they could conduct programmes of 'rescue excavation' in their areas. This marks the third phase, one in which large amounts of excavation were undertaken in most of England's major historic towns and cities. This work was almost wholly reactive, done in response to planning decisions which had taken little or no account of archaeological implications. One effect of this phase of work was the accumulation of large backlogs of unpublished urban excavations; dealing with these was to absorb a substantial proportion of English Heritage's archaeological funding throughout the 1980s (by which time a system of project-based funding had been introduced) (Thomas 2006a, 186–7).

The late 1980s saw the early beginnings of what was to come after 1990, in two respects. First, some planning authorities began integrating archaeological considerations into their decision-making on new development. Second, especially in London, some archaeological units began to persuade some developers to contribute to the costs of excavations on their sites. This funding

was purely voluntary, but this was nonetheless an important step (BADLG 1986).

The year 1989 was marked by three major archaeological *causes célèbres*: cases in which development unexpectedly threatened to destroy important archaeological remains. Two of these involved Roman buildings: at the Queen's Hotel in York (Sheldon 1989) and the Huggin Hill Roman baths in the City of London (Rowsome and Wooldridge 1989). The third was the discovery of remains of Shakespeare's Rose Theatre on the site of a proposed office block in Southwark, London (Wainwright 1989). This last case caused enormous public and political controversy, and led directly to the publication of PPG 16 in 1990. The government realised that the best way to avoid similar difficulties in future was to integrate archaeological considerations properly into the planning system, and this was what PPG 16 did.

PPG 16 AND ITS SUCCESSORS

PPG 16 was published on 12 November 1990. It was to transform archaeological resource management, and the archaeological profession, in England. Starting from the premise that archaeological remains are a 'finite and non-renewable resource', PPG 16 revolved around five basic principles:

- Archaeology is a material planning consideration: that is to say, it is something which planning authorities must take into account when making their decisions.
- Archaeological policies should be included in local planning authorities' development plans (e.g. Local Plans).
- The archaeological implications of proposed developments should be assessed *before* a decision is made on the planning application.
- There is a presumption that nationally important remains, whether scheduled or unscheduled, will be preserved *in situ*. Remains of lesser importance should be preserved if possible.
- If preservation *in situ* is not possible or desirable, planning permission may be given subject to the developer making satisfactory arrangements for the investigation and recording in advance of or during development (so called 'preservation by record' and 'developer-funding').

Each of these principles had an impact on the management of the archaeological resource in the Roman towns of England, as will be seen later.

PPG 16 remained in force for nearly twenty years, an unusually long time as such policies go. Changes to the wider planning system, and an increasing emphasis in policy on a single 'historic environment' (with archaeological remains, historic buildings and historic landscapes being treated as an integrated whole) meant that PPG 16 began to show its age. In March 2010 it was replaced by Planning Policy Statement 5 (PPS 5), *Planning for the Historic Environment*. PPS 5 brought policies for the different elements of the historic environment together in a single document with a uniform vocabulary, and with links to the modern planning system. It also made clear that the purpose of 'development-led investigations' was to advance understanding of the past, and to make this understanding publicly available. This was a significant shift from the PPG 16 concept of 'preservation by record', which had led to an emphasis on the creation of archives and technical reports, arguably resulting in a lack of wider public benefit from the activity (Thomas 2009). PPS 5 also rectified some of the most serious gaps in PPG 16, including a stronger requirement for full publication of excavation results and for the proper deposition of the archive in a museum: both important beneficial developments for Roman urban archaeology. PPS 5 was accompanied by a Practice Guide, which gave more detailed guidance on the application of the policies of PPS 5.

After only two years, PPS 5 was itself replaced by the *National Planning Policy Framework* (NPPF) in March 2012. This was part of a major government programme of reform, aimed at reducing the quantity of planning policy documents and guidance by distilling them into a shorter form. Happily, the fact that PPS 5 was quite recent meant almost all of its policies were retained intact, albeit reduced in length by over 50 per cent. NPPF also, for the first time, put

the historic environment on an equal footing with other planning considerations, including the natural environment.

The NPPF has been supplemented by the government's *Planning Practice Guidance*, an online resource which gives additional guidance on the application of NPPF. Although very brief, it contains important guidance on undesignated archaeological remains (DCLG 2014). Further, more detailed, advice is currently being prepared by English Heritage.

THE IMPACT OF PPG 16

The following sections will examine the impact of PPG 16 on Roman urban archaeology, looking at the effects of the five principles of PPG 16 in turn. The impact of PPS 5 and NPPF will also be considered, although the short lifespan of PPS 5 and the relative newness of the NPPF make it difficult to discern any great difference between their effects and that of PPG 16 at this stage.

MATERIAL CONSIDERATION AND INCLUSION IN DEVELOPMENT PLANS

Because most major historic towns and cities combine concentrations of archaeological remains of the highest importance with continuing development pressure, it was always clear that PPG 16 would have a particular impact in those places. In addition, the coverage of urban areas by local Sites and Monuments Records (now known as Historic Environment Records) was often very weak. This was largely because of the pace of archaeological work in such areas in the 1960s, 1970s and 1980s, the sheer volume and complexity of the archaeological information that had resulted, and the relative newness of urban archaeology as a discipline.

The proper implementation of PPG 16 in historic urban areas clearly required an improved base of information and understanding. To this end, in 1992, English Heritage announced a major programme to undertake intensive 'Urban Archaeological Strategies' for around 30 major towns and cities, and 'Extensive Urban Surveys' on a county-by-county basis for smaller towns (Thomas 2006b). Collectively, these projects have been the single most important development for archaeological information management in Roman towns since 1990.

The intensive projects as originally conceived comprised three distinct phases: the creation of an 'Urban Archaeological Database' (UAD), the production of an 'Urban Archaeological Assessment' (UAA), and the formulation of an 'Urban Archaeological Strategy' (UAS). The Extensive Urban Surveys (EUS) have a broadly similar structure, but with a particular emphasis on the production of 'assessment reports' for each individual town. Almost all the completed EUS reports are available online through the Archaeology Data Service (see: http://archaeologydataservice.ac.uk/archives/view/EUS/).

UADs are based on a data structure which contains separate, but linked, data tables for 'events' (individual episodes of archaeological investigation of different kinds), 'monuments' (which are an interpretation of what has been found in the 'events'), and 'sources' (or 'archives') which are the underlying information on which event and monument records are based. This structure accommodates the fact that, especially in an urban context, an individual monument (a Roman forum, say) may only be identified from a series of fragmentary sightings in a number of different investigations; those investigations may well have encountered various other monuments, of different periods, as well. The UAD data structure allows this complexity to be disentangled. Another very important aspect of UADs has been the mapping of 'events' and 'monuments' in Geographical Information Systems (GIS) linked to the database. This allows comprehensive period (and other) maps of the whole city to be created, and to be updated with relative ease as new discoveries are made (Thomas 2006b).

FIG. 1 shows an extract from the St Albans UAD, which is also available on the Heritage Gateway Website (http://www.heritagegateway.org.uk/gateway/) where details of all UADs can be found. Monuments within the Roman city (structures, insulae, cemeteries and so on) are represented on GIS, linked to database entries which are regularly updated and emended with new information, especially as new fieldwork adds to our knowledge.

Of the major Roman towns, Urban Archaeological Assessments (UAAs), or comparable

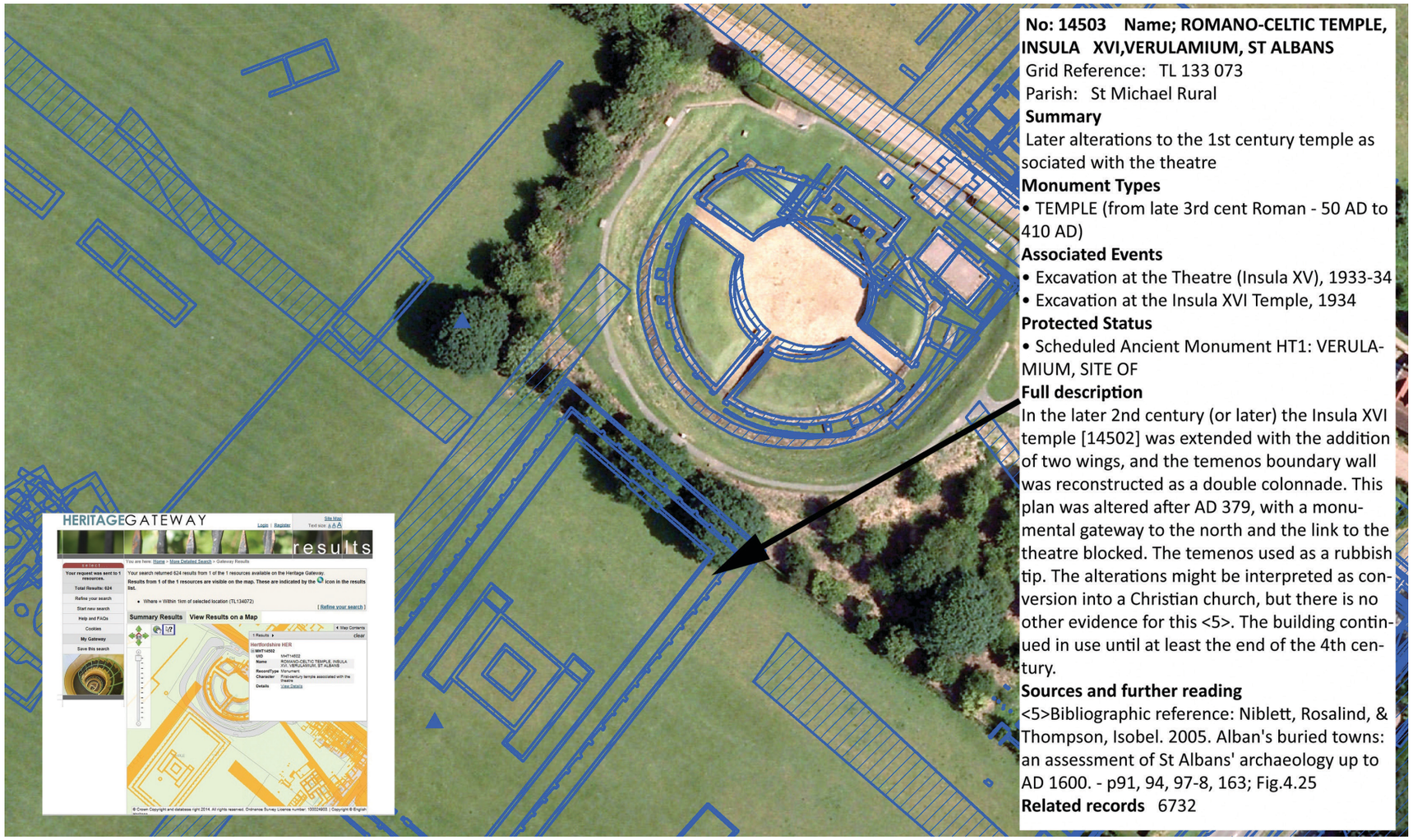

FIG. 1. Extract from the St Albans Urban Archaeological Database (UAD) within the Hertfordshire Historic Environment Record (HER), showing temples and the theatre at Verulamium Roman City. The inset shows the same information on the Heritage Gateway website: www.heritagegateway.org.uk

volumes, have been produced for Cirencester (Darvill and Gerrard 1994), Colchester (Wise 2013); Lincoln (Jones *et al.* 2003), London (Museum of London 2000) and St Albans (Niblett and Thompson 2005). Each is a substantial monograph which provides a comprehensive and up-to-date synthesis of the archaeology of the town in question. Volumes for Bath and Winchester, and for (non-Roman) Bristol, are currently being produced. It is fair to say that synthesis on this scale has proved challenging, and no further volumes in this series are currently planned.

The UADs have also been used as the basis for producing new archaeological planning policies for the centres of historic cities. A good example is the Chester Archaeological Plan (CWACC 2014). Building on an up-to-date UAD and a characterisation of the archaeology of Chester, the Plan sets out policies for archaeology and development in Chester, including defining zones of differing levels of archaeological importance. Such documents, linked to 'research frameworks' (Olivier 1996), can help to ensure a systematic approach to the conservation and investigation of Roman (and other) urban remains in the future.

'PRE-DETERMINATION ASSESSMENT'

PPG 16's requirement for 'pre-determination assessment' (i.e. assessment of archaeological implications before a planning application is determined) spawned a new type of investigation, the 'pre-determination field evaluation'. This is a limited piece of fieldwork, designed to obtain sufficient information to allow a soundly based planning decision to be taken. The result has been a large number of small investigations. In urban areas, this approach can be problematic. Access may be difficult or impossible (e.g. if the development site is covered by existing buildings). Excavating small trenches through deep and possibly complex stratification is unsatisfactory, and may in itself result in damage to important remains. In some cases, the specification for the work requires excavation to continue only to the top of undisturbed archaeological deposits. Despite all this, such 'evaluations' have yielded some academically important information, as well as providing information on which to base a planning decision. For example, the circus at Colchester was identified partly as a result of small-scale evaluation work (Wise 2013, 116–17 and fig. 7.9; Crummy 2008).

Other methods of field evaluation include boreholes and geophysical survey techniques. Both are more often used in rural environments, but have been applied in urban contexts on occasion as a supplement to the evidence from excavation trenches. For boreholes, a typical example is the small evaluation at Fetter Lane, York in 1997 where they were used successfully with traditional trial-trenches to identify the depth and nature of the Roman deposits and the extent of modern disturbance (YAT 1997).

PRESERVATION *IN SITU* POLICIES

Prior to 1990, the usual archaeological response to urban development was to accept that destruction would occur, and to carry out a 'rescue excavation' first. This was often inevitable, given that planning permissions were usually granted with little regard to their archaeological implications.

PPG 16's presumption in favour of 'preservation of archaeological remains *in situ*' ('PARIS') changed this radically. The option of preserving remains could now be considered as an alternative to excavation, particularly for nationally important remains (even if unscheduled) but also for less important ones. Crucially, preservation could be achieved whilst at the same time allowing the development to proceed, albeit usually in a modified form (Corfield *et al.* n.d.; Nixon 2004).

This had a significant impact. Deposits which would previously have been excavated and destroyed were now being left undisturbed beneath new buildings (sometimes to the bemusement of developers, who could not understand why archaeologists did not want to excavate). On deeply stratified and/or waterlogged sites, piled foundations were often used as a means of achieving preservation. In York, a policy was adopted that only 5 per cent of the deposits on a site could be destroyed (Ove Arup 1991; YCC 1992). However, PARIS and its application have been controversial within the archaeological profession (e.g. Biddle 1994). The engineering

solutions involved, such as piled or rafted foundations, do involve some destruction, and adequate recording is often difficult (e.g. of a series of pile-holes). Also, long-term monitoring of the condition of the buried remains (to see if they have been damaged by, for instance, changes in the below-ground environment) is not always undertaken in sufficient detail, and the application of the science of assessing the physical condition of the protected archaeology has not advanced greatly since 1990. In addition, there has been an active school of thought within the archaeology sector which feels that opportunities for research and furthering understanding which excavation (and especially large-scale excavation) provides have been sharply reduced by the application of the 'PARIS' policy since 1990 (e.g. Biddle 1994). It is true that the 1970s and 1980s were a particularly important and formative period for the sub-discipline of urban archaeology in Britain.

The high costs of excavating urban remains, especially deeply stratified sequences, made preservation *in situ* ('PARIS') an increasingly favoured alternative to excavation during the 1990s for both developers and local authorities. This trend was assisted by the application of targeted sampling strategies, including the use of scientific methods for analysis and dating. These improved the archaeological profession's ability to characterise urban deposits in terms of their importance and suitability for preservation. 'PARIS' has also arguably had its greatest impact on the buried archaeology of major historic towns such as Chester, York and London. The effect has been to reduce the number of urban excavations, especially large-scale excavations of the type often seen within major cities in the 1960s, 1970s and 1980s (Jones 1984, 80–96, 121–41).

'POST-DETERMINATION' ARCHAEOLOGICAL EXCAVATION AND RECORDING IN ROMAN TOWNS SINCE 1990

Notwithstanding the preservation-oriented policies of PPG 16, there has been a great deal of urban excavation since 1990, as other papers in this volume demonstrate. The high-profile, large-scale Roman urban excavations of the 1960s to 1980s have become less common (outside London), but the total number of archaeological investigations of Roman towns has increased since 1990, in some cases quite dramatically. Some of this increase has been in the form of relatively small-scale evaluations (see above) but there has also been much 'post-determination' excavation. In some cases, because of the value of urban land and pressures for regeneration, 'preservation *in situ*' policies appear to have been applied less strictly than they might have been in the countryside, and large or very large excavations have taken place in Roman towns. Very many smaller ones, some of which have nonetheless produced significant results, have also been undertaken.

Other chapters in this volume look at this work in more detail. It ranges from small but highly informative interventions, through medium- and large-scale excavations, and includes 'campaigns' in which a number of excavations have taken place over a period in a particular area. The tables contained in Chs 1, 5, 6 and 7 give further information about the number and character of excavations in Roman towns since 1990.

Undoubtedly, much has been learnt from these excavations, but the developments which occasioned them have also resulted in the removal of large areas of archaeological remains of high importance. If remains of this importance were under fields in open areas, they would almost certainly be scheduled and protected from damaging development (as is the case for Silchester and Wroxeter). As pointed out above, extensive scheduling in modern built-up areas is not practical (nor would it be acceptable either to property owners or to administrators). Nonetheless, the remains involved may often be of national importance, and the question should be asked: even under PPG 16 and its successors, has the removal of important urban archaeological remains been too readily accepted in the interests of redevelopment?

There is certainly an argument for a more judicious approach in future. The NPPF (paragraph 139) makes it clear that, for planning purposes, archaeological remains which are demonstrably equivalent to scheduled monuments should be treated as if they were scheduled. This provision, which now has greater policy weight in the planning process than it did in PPS 5, should in theory allow such nationally important remains to be formally protected in an urban planning context without recourse to scheduling, using for instance the 'PARIS' approach whereby some

limited damage is allowed so that development can take place, whilst preserving most of the deposits intact. The NPPF policy should also provide greater impetus for the consideration of alternative forms of designation to scheduling. This could include stronger policy support for the 'Archaeological Priority Areas' (or similar) which many local authorities already identify, or having a stronger below-ground archaeological component to Conservation Area designation by local authorities. The removal of permitted development rights by the use of Article 4 Directions would also help to reduce the piecemeal destruction of archaeological deposits from damaging development that falls outside of the formal planning process, such as works by utility companies and the creation of new basements within existing buildings. It remains the case, however, that balancing the wider public interest in continued development in historic towns with the needs of archaeological protection will often be challenging.

FROM PPG 16 TO PPS 5 AND NPPF

The short-lived PPS 5 and its successor NPPF introduced important changes to the policies of PPG 16. Many of the basic principles of PPG 16 were retained intact (such as pre-determination assessment and the prevention of harm) but new concepts and terminology were introduced: 'heritage asset', the notion of 'significance', and a new definition of 'archaeological interest'. Most importantly, PPS 5 and NPPF placed much more emphasis on achieving public benefit from development-led archaeology. Whereas PPG 16 referred to 'preservation by record' (in effect, stressing the importance of the archive), NPPF requires that development-led work should 'advance understanding', and that the results of investigations should be made publicly available. The emphasis on 'understanding' as opposed to 'record' marks a major change from PPG 16.

It is difficult to assess how much difference these new policies have made so far to what is happening in practice. Much work done under PPG 16 did, of course, result in publication and major advances in understanding, so in terms of outcomes this is by no means entirely new. In addition, in the recession of 2008 onwards, the level of development in England fell sharply, making it hard to see new trends in development-led archaeological work. However, the new emphasis on understanding and public benefit, and the strong policy of protection for unscheduled remains of national importance (see above) should be beneficial for the archaeology of Roman towns.

SOME ISSUES

The discussion above prompts thought about a number of issues to do with the conduct of archaeology in Roman towns within the present planning-driven and commercial arrangements.

URBAN DESIGNATION AND PROTECTION

In rural contexts, scheduling can be used to protect the most important monuments, including ones which consist solely of below-ground remains. In urban areas, matters are not so straightforward. Roman urban monuments which still survive above ground often are scheduled, such as city walls. Excavated or partially-excavated monuments may be scheduled (such as the Chester amphitheatre). Some below-ground urban remains are also protected by scheduling, typically of open spaces (such as cathedral closes). Other forms of designation (such as listing of buildings, or Conservation Areas) may also offer 'incidental' protection, by preventing damaging large-scale development.

A number of Roman major towns are designated as 'Areas of Archaeological Importance' (AAIs). AAIs are designated under Part II of the Ancient Monuments and Archaeological Areas Act 1979; the regime pre-dates PPG 16. Only five AAIs have ever been designated, and four of them are Roman towns: Canterbury, Chester, Exeter and York. The fifth is Hereford, which was not a Roman foundation. In AAIs, developers have to give notice of their intention to do works which will disturb the ground; the 'Investigating Authority' (a nominated archaeological organisation, which is sometimes the local authority) can then require time to be allowed for archaeological work. This legislation does not provide for preservation, nor does it require

the developer to pay for the archaeological work. In practice, the AAI regime has been largely supplanted by PPG 16, although it remains useful for activities which do not require planning permission, such as utilities works by statutory undertakers.

LOCAL AUTHORITY ARCHAEOLOGICAL SERVICES

The proper application of PPG 16, PPS 5 and now NPFF depends on local planning authorities having access to competent archaeological advice. This is normally provided by expert permanent staff based in local authority archaeological or historic environment teams. These teams maintain the information base, provide archaeological advice on development proposals, specify the requirements for archaeological investigation, and monitor commercial work to make sure that it is properly conducted, and that it is completed through to publication. Such teams may also have a role in the conservation of standing fabric, such as Roman city walls (e.g. Donald Insall Associates 2008).

These services are now under considerable pressure from budget cuts and staff reductions (English Heritage *et al.* 2013). There is an added difficulty, which is that many of the older generation of local authority archaeologists with direct experience of excavating complex or deeply stratified urban sites are ageing and retiring. Succession-planning and the training of a new generation of urban-planning archaeologists are therefore very pressing issues at present.

It is also vital that resources are available for the continued maintenance and enhancement of UADs and urban Historic Environment Records (HERS). These records should be further developed as dynamic 'expert systems', available as the basis for both planning advice and ongoing academic interpretation, and which incorporate much of the accumulated knowledge of the local authority archaeologists and the many other archaeologists (professional and amateur) who have worked in Roman towns. This will, though, require a concerted collective effort.

In short, local authority archaeologists and the databases which they maintain are the mechanism by which coherence and overview are achieved. This is essential, given that the process of commercial archaeological investigation can result in a fragmentation of knowledge and information, a situation which is especially undesirable when dealing with a resource that should be treated as a single archaeological entity, such as a major Roman town.

COMMERCIAL ARCHAEOLOGY AND COMPETITIVE TENDERING

Competitive tendering has resulted in excavations in any one town being carried out by a range of different organisations. This potentially has both advantages and disadvantages. The advantages are that different organisations are more or less capable, and may be more able to do some types of work than others (for instance, large-scale urban excavation may require a particular emphasis on logistics and on working with construction managers). Tendering may help to ensure the right match between the character of the work and the capabilities of the organisation doing it. Different organisations may also bring different intellectual perspectives to the work. The disadvantages are really the other side of the same coin: if work in one town is done by several different organisations, there may be a fragmentation of research effort, and maintaining consistency (e.g. in sampling methods) may be more difficult. In addition, some urban excavations (e.g. on sites which are in close proximity to each other) may be better written up together, rather than as a series of separate reports. Competitive tendering may make this hard to achieve; consistency in the archaeological briefs produced by local authority archaeologists is important here (see IfA 2013). The competitive systems may also make the maintenance of specialist expertise, and the production of thematic specialist studies, more difficult (see below, and Robinson, this volume).

SMALL-SCALE INVESTIGATION

Another issue is the value of small-scale investigations. Evaluation and preservation *in situ* policies have, in some cases, led to small-scale investigations and observations, where there is

limited disturbance (e.g. from service trenches, pile holes and the like) of deposits which are otherwise being largely preserved. In archaeological terms, trying to observe and record complex stratification in narrow or deep excavations, or in confined spaces, does not always produce very satisfactory results. It can also be relatively costly.

It is possible to question the academic value of the results from such work. The answer, though, is not straightforward. It can be taken as read that the purpose of archaeological investigations, including development-led and commercial ones, is to contribute to knowledge. This is made explicit in NPPF, paragraph 141, which requires developers to 'record and advance understanding of' remains which are to be lost to development. It might be argued that a small hole in the middle of a Roman town may simply tell us that there is Roman occupation present, which adds very little to what is already known. In towns in particular, however, archaeological knowledge often develops through the accumulation (and combination) of numerous very small pieces of evidence. The recognition of the Roman forum in London is a classic example of this from the pre-commercial era (Marsden 1987); in the same way, the circus at Colchester was only identified from fragments of evidence derived from a number of small investigations (Wise 2013, 117–19, fig. 7.9; Crummy 2008).

Thus, while the results from small investigations can be individually unimpressive, they can, collectively and over time, produce information and understanding of the greatest importance. The answer to this apparent conundrum may lie in recognising that the major towns of Roman Britain are a very small, rare and important category of site, and that almost any evidence from them, even if very fragmentary, is therefore of particular importance; the precise nature of that importance may not, however, become evident for many years or even many decades after its discovery. This is a powerful argument for continuing to undertake even very small investigations in these important urban areas.

SPECIALIST STUDIES (ARTEFACTS, ENVIRONMENT AND ECONOMY)

State-funded rescue archaeology (especially urban post-excavation) supported the maintenance of a cadre of artefact and environmental specialists, and resulted in the production of numerous important synthetic volumes and articles (e.g. Maltby 1979 on faunal remains; Crummy 1983 on small finds; Holbrook and Bidwell 1991 on pottery). There is a question over whether the present system of commercially-based competition and funding allows for the maintenance and development of this kind of high-level expertise; the very specifically site-based funding certainly does not make it easy to produce thematic publications which draw on material from a number of different development projects. This topic is explored in more detail by Mark Robinson below. English Heritage also continues to provide some support for synthetic work.

GREY LITERATURE, PUBLICATION AND ARCHIVING

One of the effects of PPG 16 was the growth of archaeological 'grey literature' — reports which are not formally published, but are produced in limited number for the purposes of the planning process. There has been much discussion of the value and accessibility of this new genre of archaeological reporting (Bradley 2006; Fulford and Holbrook 2011). The index of such material provided by the Archaeological Investigations Project (currently discontinued for funding reasons) and the OASIS system, along with dissemination via the Archaeology Data Service's Grey Literature Library (or, in some cases, the web-sites of individual commercial archaeological organisations), have gone some way to addressing this situation.

Slow or non-publication of excavations is, of course, a perennial problem in archaeology as a whole, but it may be especially acute in urban areas, because of the complexity of the remains and the volume of artefacts and environmental materials which is often encountered. Many important publicly-funded urban excavations from the pre-PPG 16 era remain unpublished. For the period after 1990, Fulford and Holbrook examined publication rates of commercial excavations dealing with Roman sites, and found many cases of important work remaining unpublished after seven years or more (Fulford and Holbrook 2011, 333). In some cases, though, the combination of

planning controls, commercial discipline and good professionalism and management has resulted in high-quality reports appearing reasonably soon after the completion of fieldwork, e.g. Oxford Archaeology's work at the Lankhills Roman cemetery in Winchester (Booth *et al.* 2010) or that by Cotswold Archaeology at Cirencester (Holbrook 2008). The picture is, therefore, a mixed one. When they work well, the current arrangements — in which archaeological consultants acting on behalf of the developer may monitor the progress of the archaeological work and only release payment when the work is completed, and in which the fulfilment of conditions on the planning permission may depend on the completion of the archaeological reports — may actually be a very effective way of ensuring timely completion. In addition, developments in professional archaeological practice (particularly in the area of project management, e.g. English Heritage 2006) may have helped to improve completion rates.

Proper archiving of excavation results, including deposition of the archive in a museum, is a widely-recognised concern in archaeology; one aspect of this is simply the lack of adequate space in which to store excavation archives. This has certainly been seriously exacerbated by the volume of work generated by PPG 16 and its successors; Roman urban sites, with their sometimes great volumes of pottery, ceramic building material and animal bones, may be a major contributor to this problem. The issue in general has been examined in a recent review (Edwards 2013). Given the accretive nature of urban archaeological knowledge (see above), the long-term maintenance and security of the archives of past work is particularly important for urban archaeology. The policies of NPPF are helpful in this respect (see above).

THE CONTRIBUTION TO KNOWLEDGE: A SUMMARY

What, overall, has been the contribution to knowledge made by development-led commercial archaeological work in the major Roman towns of England? This volume as a whole sets out to explore this question, so this concluding section will simply offer a brief overview.

Arguably, one of the greatest advances has come, not from commercial work, *per se*, but from the impetus which PPG 16 provided to improve the archaeological information base in urban areas. This has been done through English Heritage's Urban Archaeological Database (UAD) and Extensive Urban Survey (EUS) programmes. These have made high-quality and up-to-date summaries of existing information readily available, often now in a GIS form. This better and more comprehensive base of information and understanding helps to secure better planning decisions affecting archaeology, but it is also a starting point and major resource for future research projects on the towns in question (or on Roman urbanism generally).

Some have argued (e.g. Biddle 1994) that the preservation-oriented policies of PPG 16 have had a negative effect on the development of knowledge, because they have reduced the amount of excavation taking place. Two comments may be made. First, this seems a short-term view. Very large amounts of excavation took place up until 1990, some of it still not published and much of it not really synthesised or absorbed into wider thinking about Roman towns. As long as that remains the case, there is a strong argument for being very judicious about the removal of yet more of what is, after all, a very rare and highly important category of archaeological remains (see above). Second, notwithstanding the policies of PPG 16, there has still been a great deal of urban excavation, made possible by the requirement for developers to meet the archaeological costs occasioned by their developments. Notwithstanding significant concerns over the standard of some commercial work, rates of publication and problems of archive deposition, the overall contribution of this work has been substantial. This is clearly shown by the papers in the rest of this volume.

It is probably fair to say that urban archaeology in the years since 1990 has been very different from what it was in preceding decades. Urban archaeology in the years from about 1950 to 1990 was often rather heroic, with major and unexpected discoveries being made and dealt with, often under conditions of considerable difficulty and urgency, in a situation in which the character of the urban archaeological resource — in other words, what would be found when excavation began — was often very largely unknown. This 'heroic' period also witnessed some serious losses (see above). By contrast, development-led archaeological work in the major towns

of Roman Britain since 1990 has perhaps been more orderly and more predictable. Nonetheless, it has resulted in the steady accumulation of new and high-quality information, and considerable advances in knowledge. The priorities for the future are two-fold: fuller synthesis of all this new material, and making our new understandings accessible to wider audiences. This volume is a significant contribution to both of those objectives.

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BIBLIOGRAPHY

Biddle, M. 1994: *What Future for British Archaeology?*, Oxbow Lecture 1, Oxford

Booth, P., Simmonds, A., Boyle, A., Clough, S., Cool, H.E.M. and Poore, D. 2010: *The Late Roman Cemetery at Lankhills, Winchester: Excavations 2000–2005*, Oxford

Bradley, R. 2006: 'Bridging the two cultures: commercial archaeology and the study of prehistoric Britain', *Antiquaries Journal* 86, 1–13

British Archaeologists and Developers Liaison Group [BADLG] 1986: *British Archaeologists and Developers Liaison Group Code of Practice*, London

Cheshire West and Chester Council [CWACC] 2014: *Chester Archaeological Plan*, Chester. Available online at: http://www.cheshirearchaeology.org.uk/?page_id=165 (Accessed 26 June 2014)

Corfield, M., Hinton, P., Nixon, T. and Pollard, M. (eds) n.d. [1998]: *Preserving Archaeological Remains in situ: Proceedings of the Conference of 1st–3rd April 1996*, London

Crummy, N. 1983: *The Roman Small Finds from Excavations in Colchester 1971–9*, Colchester

Crummy, P. 2008: 'The Roman circus at Colchester', *Britannia* 39, 15–32

Darvill, T. and Gerrard, C. 1994: *Cirencester: Town and Landscape. An Urban Archaeological Assessment*, Cirencester

Department for Communities and Local Government [DCLG] 2010: *Planning for the Historic Environment*, Planning Policy Statement 5, London

Department for Communities and Local Government [DCLG] 2012: *National Planning Policy Framework*. Available online at: https://www.gov.uk/government/publications/national-planning-policy-framework--2 (Accessed 27 June 2014)

Department for Communities and Local Government [DCLG] 2014: *Planning Practice Guidance*. Available online at: http://planningguidance.planningportal.gov.uk (Accessed 26 June 2014)

Department for Culture, Media and Sport [DCMS] 2013: *Scheduled Monuments & Nationally Important but Non-Scheduled Monuments*, London. Available online at: https://www.gov.uk/government/publications/scheduled-monuments-policy-statement (Accessed 26 June 2014)

Department of the Environment [DoE] 1990: *Archaeology and Planning*, Planning Policy Guidance 16, London

Donald Insall Associates 2008: *Chester City Walls Conservation Management Plan*, unpub. report for Chester City Council

Edwards, R. 2013: *Archaeological Archives and Museums*, Society of Museum Archaeologists. Available at: http://www.socmusarch.org.uk/docs/Archaeological-archives-and-museums-2012.pdf (Accessed 23 June 2014)

English Heritage 2006: *Management of Research Projects in the Historic Environment. The MORPHE Project Manager's Guide*, Swindon

English Heritage, Association of Local Government Archaeological Officers and Institute of Historic Building Conservation 2013: *A Fifth Report on Local Authority Staff Resources*. Available online at: http://www.helm.org.uk/guidance-library/fifth-report-la-staff-resources/ (Accessed 27 June 2014)

Fulford, M. and Holbrook, N. 2011: 'Assessing the contribution of commercial archaeology to the study of the Roman period in England, 1990–2004', *Antiquaries Journal* 91, 323–45

Holbrook, N. (ed.) 2008: *Excavations and Observations in Roman Cirencester 1998–2007*, Cirencester Excavations 6, Cirencester

Holbrook, N. and Bidwell, P. 1991: *Roman Finds from Exeter*, Exeter

Institute for Achaeologists [IfA] 2013: *Standard and Guidance for Archaeological Advice by Historic Environment Services*. Available online at: http://www.archaeologists.net/codes/ifa (Accessed 26 June 2014)
Jones, B. 1984: *Past Imperfect: The Story of Rescue Archaeology*, London
Jones, M.J., Stocker, D.A. and Vince, A.G. 2003: *The City by the Pool: Assessing the Archaeology of the City of Lincoln*, Oxford
Maltby, M. 1979: *Faunal Studies on Urban Sites: the Animal Bones from Exeter 1971–1975*, Sheffield
Marsden, P. 1965: 'The County Hall ship', *Transactions of the London and Middlesex Archaeological Society* 21 (2), 109–17
Marsden, P. 1987: *The Roman Forum Site in London: Discoveries before 1985*, London
Mattingly, D. 2006: *An Imperial Possession. Britain in the Roman Empire, 54 BC–AD 409*, London
Millett, M. 1990: *The Romanization of Britain*, Cambridge
Museum of London 2000: *The Archaeology of Greater London. An Assessment of Archaeological Evidence for Human Presence in the Area now Covered by Greater London*, London
Niblett, R. and Thompson, I. 2005: *Alban's Buried Towns: an Assessment of St Albans' Archaeology up to AD 1600*, Oxford
Nixon, T. (ed.) 2004: *Preserving Archaeological Remains* in situ*? Proceedings of the 2nd Conference, 12–14th September 2001*, London
Olivier, A. 1996: *Frameworks for Our Past: A Review of Research Frameworks, Strategies and Perceptions*, London
Ove Arup and Partners 1991: *York Development and Archaeology Study*, unpub. report for York City Council
Pilbrow, J. 1871: 'Discoveries made during excavations in Canterbury in 1868', *Archaeologia* 43, 151–64
Rowsome, P. and Wooldridge, K. 1989: 'Swept under the carpet: excavation and preservation at Huggin Hill', *Rescue News* 48, 3
Sheldon, H. 1989: 'The curious case of the Queen's Hotel [York]', *Rescue News* 47, 1
Shepherd, J.D. 1998: *The Temple of Mithras, London: Excavations by W.F. Grimes and A. Williams at the Walbrook*, London
Thomas, R.M. 2006a: 'English Heritage funding policies and their impact on research strategy', in J. Hunter and I. Ralston, *Archaeological Resource Management in the UK – An Introduction* (2nd edn), Stroud, 179–93
Thomas, R.M. 2006b: 'Mapping the towns: English Heritage's urban survey and characterisation programme', *Landscapes* 7 (1), 68–92
Thomas, R.M. 2009: 'Rethinking PPG 16', *The Archaeologist* 73, 6–7
Wainwright, G.J. 1989: 'Saving the Rose', *Antiquity* 63, 430–5
Wise, P.J. (ed.) 2013: *Colchester. Fortress of the War God. An Archaeological Assessment*, Oxford
York Archaeological Trust [YAT] 1997: *18A–19 Fetter Lane York – Archaeological Evaluation Report*, Field Report 19, unpub. York Archaeological Trust report
York City Council [YCC] 1992: *Conservation Policies for York: Archaeology*, unpub. York City Council report