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Date July 24, 1996
ABSTRACT

In 1991 the City of York in England adopted a policy to manage its archaeological heritage. The policy was in response to national directives that sought to locate the management of the sub-surface resource within the local planning process. This approach was pursued in order to ameliorate the costly and often controversial problems that had occurred when planning consent was given without the consideration of the archaeological potential of a site.

The research examines the planning dilemma of how to create a policy that balances the economic value of regeneration and the historic value of the archaeological resource. The intention of this study is to assess the success of the policy adopted in York in terms of an overall planning framework that allows planners to meet the requirements of the living community, while preserving the archaeological heritage; as well as the policy's success in meeting its own aims and objectives.

To understand the situation thoroughly, a holistic approach combining field research and library research was undertaken. Basic data sources include in-depth interviews with a diverse group of stockholders including archaeologists, planners, politicians, developers, architects and amenity group leaders; and primary and secondary documents which include policy statements, newspaper articles, journals, monographs and books.

The research for the study suggests that overall the policy has accomplished the majority of its aims and objectives. In particular, it facilitates development while preserving the archaeological heritage. To ensure the continued success of the policy, however, it is critical that steps are taken to integrated it more comprehensively into the larger domain of planning responsibilities.
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CHAPTER ONE

INTRODUCTION

Until 1990, the physical evidence for the history of England was being destroyed on an immense scale, at a rapid pace, and often without record. "In town and country, by development and redevelopment, by the extraction of sand and gravel, by mining, farming and afforestation, the surviving remains of the past were steadily being eroded (Heighway, 1972: vi)."

The crisis in urban archaeology was particularly acute because of the extent and archaeologically destructive nature of modern urban development, and the lack of protective legislation. For example, the square mile of the City of London is considered to be one of the richest archaeological archives in Europe. It has been estimated, however, that 75 per cent of the city's archaeological remains has already been destroyed (Heighway, 1972: 5). While the issues surrounding archaeology in urban areas may be especially acute in ancient cities (for example York, Chester, London, Athens, Rome) they are nonetheless salient for many newer cities which are also situated over or in close proximity to historically significant cultural remains.

Although there has been a shift towards a more collaborative approach between developers and archaeologists, the interests of archaeologists and developers are often difficult to reconcile. One wishes the demolition of existing buildings with as rapid a rebuilding schedule as possible, the other the opportunity to study the historic fabric that had been concealed by the demolished building. Moreover, in the event that prolonged study is not an option, which is typically the case in an urban context, the archaeologist wishes the opportunity to record and retrieve as much information as possible before the concrete is poured. This situation is further complicated
by the conflicting interests of government. While there is desire on the part of government to provide cultural leadership by protecting the archaeological heritage, they are also interested in the obvious economic benefits derived from facilitating development such as a broader tax base, and increased employment opportunities.

By the late 1980s the situation in urban archaeology had become intolerable for archaeologists, developers and policy makers alike. As a result of three highly public and controversial sites, new planning policy guidance was adopted that changed radically the way in which archaeology is approached in England. Archaeology is now seen as an integral part of the local planning process, and therefore local authorities are required to create policies that integrate archaeology as a material consideration in the planning process. The planning dilemma therefore is how to create a framework that balances the economic value of regeneration and the historic value of archaeology.

As a result of these changes, local authorities are now obligated to locate archaeological considerations within their overall planning responsibilities. Thus, in regards to the archaeological resource it would be expected that planners must now be concerned with the following points:

1. Policy: planners must consider how broad statements of strategy and direction will be integrated into local structure plans.
2. Regulation: planners must weigh the impact of archaeology upon the legal basis for property development, such as development controls and by-laws.
3. Mediation and consultation: planners must now mediate between competing interests, as well as foster community awareness and interest.
4. Evaluation: planners must now consider the costs and benefits of the archaeological heritage, and its impact on the local economy.
1.1 What is Archaeology and Why is it Important?

The Oxford Dictionary defines archaeology as "the study of human history and prehistory through the excavation of sites and analysis of remains." It is described as

"partly the discovery of the treasures of the past, partly the meticulous work of the scientific analyst, partly the exercise of the creative imagination. It is toiling in the sun on an excavation in the deserts of Iraq, it is working with living Eskimos in the snows of Alaska...But it is also the painstaking task of interpretation so that we come to understand what these things mean for the human story (Renfrew and Bahn, 1991: 9)."

This description leads to the question of why archaeology is important. As one archaeologist explains,

"[archaeology] is crucial to human survival on this planet, and should be accorded high priority and resources by modern society. Understanding of humankind's past is an important aid to understanding people today. It is the one subject which is central to all knowledge. It is archaeology which uniquely can provide the total perspective of human beings on this planet. We need this to be able to take a cool, balanced look at our own society (Rahtz, 1991: 3)."

Furthermore, archaeology is the key to unlocking much of the past simply because so little of human history is in written form. Written history beyond the last five centuries is piecemeal at best, and is typically preoccupied with a small percentage of the population as well as significant events. Archaeology, however, allows its practitioners to go beyond the few and the famous. It provides information about the whole fabric of society, from the activities of hunter-gatherers to those of urban occupants, from peasants to chieftains, from lakeside villagers to desert dwellers.

Similarly, the importance of archaeology for the study of towns is that it is virtually the only source of detailed information on the first thousand years of their history. One of the most important and distinctive aspects of the archaeology of places with a long history, such as towns, is the potential it offers for the detailed study of social and economic change, which often
has a significance far beyond the towns themselves. The reason for this lies in the depth and complexity of the superimposed layers of buried material, or strata, which are testimony to the intensive and varied nature of occupation in towns over past centuries (Ottaway, 1992: 7). Thus, it is critical that planning frameworks and processes are created and adapted to ensure the systematic preservation of archaeological remains.

1.2 Scope

This research focuses on archaeological heritage management in England. The situation in other jurisdictions of the United Kingdom, for example Wales and Scotland, is governed by different circumstances and different legislation. Further, this thesis is concerned with the issues surrounding archaeology in an urban context. Countryside archaeology involves different stakeholders, different legislation, and different archaeological approaches.

In particular, this research is concerned with the policy directives taken in York. Geographically, York is located approximately 200 miles north of London, near England’s east coast (see Map 1). The city was founded in 71 A.D. by the Romans and has remained a settlement ever since. "York was a Roman legionary fortress, a Roman colonia, an important post-Roman centre, the capital of an Anglo-Scandinavian kingdom, and finally the city second only to London in importances for much of the medieval period (Andrews, 1984: 173)."

York was selected for the case study component of this research on the recommendation of Dr. James Russell, in the Department of Classical Studies at the University of British Columbia. This choice was based upon the presumption that York has a reputation for proactive archaeological management. As the research indicated, however, it is only in the last five years that the York City Council has become involved in managing its
archaeology, and even then only in response to national directives. The current planning framework in York, however, does provide an instructive case study for other jurisdictions.

1.3 Purpose of Research

The purpose of this research is to analyze and assess the current planning framework for managing the archaeological heritage that has been adopted in the City of York. The policy will be assessed according to the following four lines of inquiry: the role of stakeholders in the creation and implementation of the policy; the implementation of the policy; the implications of the policy; and reactions to the policy. The intention of this assessment is to determine the success of the policy in terms of an overall planning framework that allows planners to meet the requirements of the living community, while preserving the archaeological heritage; as well as the policy's success in meeting its own aims and objectives.

1.4 Methodology

1.4.1 Framework

As the research focuses on the current situation in managing the urban archaeological resource in England, a case study approach comprises the main research strategy. Furthermore, because this study concentrates on the perspectives of interested stakeholders, both direct observations and systematic interviews were conducted during the field research.

1.4.2 Data Requirements

The specific data requirements for this investigation included both primary and secondary information. Primary data was gathered in York during the field research component and focused on the lines of inquiry as set out above. Both participant observations and in-depth interviews with
selected informants provided the major portion of data. The secondary data included current documentary material from such sources as official documents, newspaper articles, journals, monographs and books.

1.4.3 Methods for Gathering Data

The first stage in data gathering included library research and the investigation of secondary material on archaeology, heritage management, and other related topics. Due to the limited amount of information in Canada, library research was also undertaken in York. The second stage of data gathering occurred during the field research component. This aspect of the research included both participant observations and informal interviews.

1.5 Key Informants

In total 18 interviews were conducted by means of a questionnaire that was written in Canada, but adapted upon arrival in York with the aid of Jane Grenville, an instructor in the Heritage Management program at the University of York (see Appendix A). The informants interviewed included politicians, planners, archaeologists, amenity group leaders, developers, and architects (see Appendix B). Jane Grenville and John Oxley, Principal Archaeologist for the City of York, were particularly helpful in suggesting individuals who they thought would have valuable information or particular viewpoints that would enhance the research. The interviews ranged between one hour and two hours depending on the informant's familiarity with the policy and the issues involved.

1.6 Thesis Organization

This thesis consists of seven chapters. Chapter one defines the problem statement and discusses the methodological approach taken.
Chapter two provides an outline of the current legislative basis for archaeology in England. Chapter three offers a descriptive analysis of the historical development of the theoretical approaches to archaeology and heritage management, as well the events that lead up to the current policy position in England. Chapter four gives an overview of York's history and its archaeological importance. Chapter five summarizes York's archaeological policy. Chapter six provides an analysis and assessment of the policy. Finally, chapter seven concludes the study and makes recommendations for the implementation of the policy at the local level, as well as possible policy directives at the national level.
CHAPTER TWO

LEGISLATIVE BASIS FOR ARCHAEOLOGY IN ENGLAND

England has a long history of protecting its past, albeit a selective portion of its past. One of the first proclamations protecting ancient monuments came during the reign of Elizabeth I in 1560. This proclamation forbade the "defacing of Monuments of antiquity, being set up in the churches or other public places for memory, and not for superstition." It provided further instructions to offenders "to provide that no such barbarous disorder be hereafter used, and to repair as much of the said Monuments as conveniently may be (Boulting, 1976: 3)."

Today, the only legislation that deals directly with archaeology is the Ancient Monuments and Areas Act 1979. The basic legal mechanisms of the Act are essentially protective rather than prohibitive (Saunders, 1989: 156). Beyond this piece of legislation there are a number of Circulars, Planning Policy Guidance Notes, and ministerial statements; but these are often disparate in nature and regularly consist of only a single sentence or paragraph that is of any relevance to archaeology (Speorry, 1993: 1).

As the primary focus of this investigation is an analysis of the local policy that currently exists in the City of York, it is important to understand the legislative framework within which the policy operates. Further, an exposition of the statutory position of archaeology will help to put into context the circumstances which led to the creation of the York policy. Thus, the purpose of this chapter is twofold: to provide a brief history of the legislative developments concerning archaeology; and to discuss the current legislation that addresses archaeology, namely the Ancient Monuments and Archaeological Areas Act 1979.
2.1 Historical Development

The first significant piece of archaeological legislation came in 1882 with the passing of the Ancient Monuments Protection Act. This Act represented the culmination of 13 years of work by Sir John Lubbock to establish legislation for the protection of ancient monuments. Originally his Bills would have given the Government the power to take any monument into care; however, this position was viewed as imposing unjustly on private property rights. Therefore, in order to pass the legislation Lubbock had to be satisfied with a significantly diluted version. In the end the Bill's principal provision was that the Commissioners of the Board of Public Works could, with the owner's consent, take into guardianship, or acquire, any monument included in a short-list or schedule. This schedule included 50 monuments in England most of which were of prehistoric origin—earthworks, burial mounds and stone circles. In return, the Commissioners accepted the duty of maintaining such monuments at the public expense. Although the Act made vandalism by members of the public punishable by fine or imprisonment, the owner of an ancient monument was at liberty to destroy or neglect the monument. Moreover, nothing in the Act compelled an owner to give guardianship to the Commissioners (Boulting, 1976: 6; Cleere, 1984: 54-55).

Eighteen years later amendments to the 1882 Act were passed by Parliament. The Ancient Monuments Protection Act 1900 offered protection to medieval as well as prehistoric remains, and extended the notion of guardianship to any monuments deemed to be of national importance. The Act also extended the provision of guardianship to local authorities, although guardianship still required the consent of the owner.

In response to the attempts by a wealthy American to dismantle and ship Tatershall Castle to the United States, further changes to the legislation were made in 1913. Consequently, owners of scheduled monuments that
were not in the care of the state were required to give one month notice of any intention to disturb, alter or destroy a monument (Cleere, 1984: 55). More importantly, provision was made to ensure that if a monument was threatened, the Commissioners or the local authority were empowered to make a preservation order, thus assuming guardianship without the owners consent, while maintaining them at public expense (Boulting, 1976: 7).

The next significant change to ancient monument legislation came in 1931. This Ancient Monuments Act originated with the threat to Hadrian's Wall in northern England in the face of quarrying operations. The Act introduced a procedure for protecting the surroundings of a monument through strict planning controls over any development in the designated area. In addition, compensation for owners subject to compulsory purchase was introduced, and the advance notification of proposals to disturb or destroy scheduled monuments was extended to three months (Cleere, 1984: 55).

2.2 Current Legislation

Ancient Monuments legislation was consolidated and updated in the Ancient Monuments and Archaeological Areas Act 1979 (AMAA Act 1979). This Act was intended to

"...amend the law relating to ancient monuments; to make provision for the investigation, preservation and recording of matters of archaeological or historical interest and for the regulation of operation or activities affecting such matters (AMAA Act, 1979: 1)."

Part One of the Act deals with the protection of monuments either by means of scheduling or by guardianship. In terms of the former, the Act states that the Secretary of State shall compile and maintain for the purposes of this Act a schedule of ancient monuments. The list will include all ancient monuments scheduled under earlier legislation, as well as any ancient monument which the Secretary of State deems to be of national
importance. The exceptions are any wreck protected by an order under the Protection of Wrecks Act 1973, a dwelling house occupied by any person other than a caretaker, or an ecclesiastical building that is used for ecclesiastical purposes [Section 61(8)].

According to the Act a monument is defined as the following:

"(a) any building, structure or work, whether above or below the surface of the land, and any cave or excavation;
(b) any site comprising the remains of any such building, structure of work or of any cave or excavation; and
(c) any site comprising, or comprising the remains of, any vehicle, vessels, aircraft or other movable structure or part thereof which neither constitutes nor forms part of any work which is a monument within paragraph (a) above; and any machinery attached to an monument shall be regarded as part of the monument if it could not be detached without being dismantled [Section 61(7)]."

Even if an object is covered by this definition, however, it is not automatically afforded statutory protection. In other words, legally there is a distinction between a monument and an ancient monument, the latter being covered by this Act. The Act defines an ancient monument as "any scheduled monument; and any monument which in the opinion of the Secretary of State is of public interest by reason of the historic, architectural, traditional, artistic or archaeological interest attaching to it [Section 61 (12)]." Thus, the key to the definition is national importance, which is determined by the Secretary of State according to the following criteria:

"**Survival and condition:** This is determined by the extent of the survival of the monuments archaeological potential and what condition it is in.

**Period:** The age of the monument and whether or not it characterizes a period or category.

**Rarity:** Any item that is deemed to be so scarce that all those that retain any archaeological potential should be preserved. However, the designation provides that the typical and commonplace examples must also be protected, and therefore the Secretary of State will take into account the distribution of a
particular class of monuments in both a national and regional context.

**Fragility and Vulnerability:** This applies to monuments that are particularly vulnerable such as field monuments, which can be destroyed by a single ploughing or standing structures whose value could be reduced by neglect or careless treatment. In these cases, it is believed that scheduling will provide a greater degree of protection.

**Diversity:** This designation applies to monuments that may have a particular attribute of singular importance or a combination of high quality features.

**Documentation:** The significance of a monument may be substantiated by records, which in some cases may be contemporary with the monument itself, or, as in the majority of cases, may be from previous archaeological investigation.

**Group Value:** The value of an individual monument may be enhanced by its association with other related monuments.

**Potential:** This category best applies to unexcavated sites rather than monuments. In other words, when the physical evidence is not readily available to substantiate the site's significance, but it is possible to provide reasonable documentation in order to support the presumption of a site's existence and importance (DoE, 1990: Annex 4).

Although the Department of National Heritage schedules monuments on advice from English Heritage, anyone can put forward a candidate for scheduling. While owners of monuments under consideration for scheduling are usually notified, there is no appeal against scheduling, and there is no longer any provision for compensation (Breeze, 1994: 46). Once scheduled, the site is registered as a charge in the local land registry, and the local authorities are notified. It is worthwhile to note that the 1979 Act abrogated that part of the Ancient Monument Act 1931 which provided for the protection of the amenities of an ancient monument on the grounds that such matters are best dealt with through the planning legislation (Breeze, 1994: 47).

Once a monument has been scheduled, consent must be given by the Secretary of State before any works can be carried out which would affect
the monument. This covers:

"a) any works which would result in the Scheduled Monument's destruction or demolition, or which would cause any damage to it; or
b) any works for the purposes of removing of repairing a Scheduled Monument or making any alterations to it; or
c) any flooding or tipping operations on land in, on or under a Scheduled Monument [Section 2(2)]."

The principle of consent completely changed the previous situation where an owner was simply required to give notice of any intention to undertake work on or around a monument. Now, the Secretary of State may refuse an application for scheduled monument consent or he/she may grant consent for any of the above works unconditionally or subject to conditions (Biddle, 1994: 2). Failure to obtain schedule monument consent is an offence, the penalty of which can be unlimited if the indictment is by a Crown Court (Speorry, 1993: 4). The exceptions to schedule monument consent fall under the Ancient Monuments (Class Consents) Order 1984. This legislation provides that certain activities do not require schedule monument consent. These activities include agriculture, horticulture and forestry works provided that the activities formed the regular use of the land in the previous five years (not including any major ground disturbance operations such as drainage, subsoiling and tree planting); works carried out more than 10m below ground by the National Coal Board or its licensees; essential repair and maintenance work by the British Waterways Board; minor repairs to machinery; work essential for health and safety; and work carried out by English Heritage (Breeze, 1994: 48).

Part One of the 1979 Act also provides for ancient monuments to be acquired by the Secretary of State either by agreement, by gift or by compulsory acquisition (Ross, 1996: 144). However, the most common way of aiding in the protection an ancient monument is for the State to take it into guardianship. Guardianship of an ancient monument is entered into
voluntarily, and provides that ownership remains with the landowner, while maintenance and management becomes the responsibility of the Secretary of State, the Commission or the local authority. The one caveat to guardianship agreements is that the landowner must provide for public access to the scheduled monument.

Unless a scheduled ancient monument is in guardianship, the responsibility for keeping it properly maintained and repaired rests with the owner. One alternative under Section 17 of the 1979 Act, provides that the Secretary of State or the local authority can enter into management agreements, for scheduled or unscheduled monuments. These agreements relate to the payment of costs for ongoing maintenance and management such as fencing, clearance of scrub and pest control. Another alternative may be for the Secretary of State or the local authority to provide grants to owners for capital costs such as the consolidation of masonry structures (Breeze, 1994: 49). If, however, a scheduled monument is being neglected, under Section 5 of the 1979 Act the Secretary of State has the power to carry out any work for the preservation of the monument. The Secretary of State is only required to give seven days notice to the owner before carrying out the intended work.

Although scheduling is a strong protective measure, it is clear that it does not necessarily protect a monument indefinitely. It simply provides that careful consideration is given to the case for preservation (Saunders, 1989: 156). Moreover, by definition, scheduling deals only with a list of selected sites of "national importance". This raises such questions as how to deal with undiscovered sites, or known sites of unknown or unsuspected potential. These questions are increasingly difficult to answer when the buried remains are situated in an urban context (Biddle, 1994: 3).

Due to their inherent complexity there is a greater degree of difficulty in defining and assessing urban deposits. This difficulty in turn creates a
problem when attempting to identify which parts of the urban archaeological resource most merit protection (Wainwright, 1993: 416). It has been suggested that scheduling could be an appropriate response for the protection of buried archaeological deposits lying within planned urban open spaces where long term preservation is possible (Wainwright, 1990: 3). Further, because the presumption underlying scheduling is preservation, which has an restrictive effect on property rights, authorities must be able to tightly define the area to be scheduled and to describe in detail the nature of the areas contents (Wainwright, 1990: 3).

Part II of the 1979 Act relates to the designation and operation of Areas of Archaeological Importance. This is a new departure in British legislation, and marks the first attempt to make provisions for the particular problems associated with archaeology in urban settings (Cullingworth and Nadin, 1994: 157). Part II empowers the Secretary of State to designate Areas of Archaeological Importance. The intention behind the designation is to provide an opportunity for archaeological examination and recording before development takes place (Ross, 1996: 38). In England, areas within five historic towns were designated under Part II of the Act: Canterbury, Chester, Exeter, Hereford, and York.

Within an Area of Archaeological Importance, the Secretary of State designates a person or persons to act as an investigating authority "whom he considers to be competent to undertake archaeological investigations [Section 34(1)]." Potential developers must serve an operations notice on the local authority detailing any proposals to disturb the ground, tip on it, or flood it six weeks prior to commencing the work. After the initial 6 week period has expired, access for an archaeological investigation of the site must be given for a period of 4 months and 2 weeks. Excavations cannot delay development beyond this period of time unless a developer voluntarily
extends the period of excavation (Ross, 1996: 151).

To many the definition of Areas of Archaeological Importance seemed to be a substantial move forward. By the nature of their definition, however, Areas of Archaeological Importance are "archaeologically expendable" (Arup, 1991: 59). As information is extracted from the sites and therefore removed from its context, archaeological voids for development are created. It is conceivable, therefore, that eventually de-designation could result as the sites become archaeologically exhausted (Arup, 1991: 59).

Effectively, Part II of the Act only provides a delay in development, which means that any archaeological investigation remains a race against time. Further, the Act makes no provision to finance these works. If the investigating authority is unable to find financing or finance the excavation itself there is no statutory requirement for the recording of the archaeology.
Archeology owes its origins to the revival of historical studies as a branch of learning during the Renaissance and the ensuing Enlightenment. Out of this revival emerged the relatively modern notion of a linear view of history. Contemporary societies were perceived as having cultural links extending back over time, which meant that the relics of earlier periods were important records of that continuity, and as such they became worthy of care and preservation (Cleere, 1989: 7).

The academic discipline of archeology and the administrative function of archeological heritage management, although inextricably linked, have developed at different rates in different parts of the world (Cleere, 1989: 1). In England, the former owes its origins to scholars like William Camden, and William Stukeley who toured their homeland recording the material remains of their ancestors. The latter is primarily associated with the legislative protection of archeology, the first enactment occurring in 1882 with the Ancient Monuments Protection Act (see Chapter Two).

This chapter examines the major trends in archeological theory and practice, as well as the events that have had a profound effect on the development of the academic discipline of archeology and its administrative cousin archeological heritage management over the past century. This overview will provide important information for understanding the current policy developments that have taken place in England in general, and York in particular.
3.1 Empiricism and Archaeology

Although archaeology has its roots in historical studies, the profession has always associated itself with science. In fact, archaeology gained momentum with the rise of science during the Enlightenment, and as a result played a key role in denouncing ideas based on myth and religion in the controversy surrounding human evolution in the work of Darwin (Hodder, 1994: 11; Renfrew and Bahn, 1991: 22).

It has been suggested that in England archaeology could not be perceived as worthy of public funds until it had reached a certain level of scientific accuracy and discipline (Clark, 1934: 414). Thus, it is no coincidence that the first Inspector of Ancient Monuments in 1882 was General Pitt Rivers who is considered by many to be the first scientific archaeologist in Britain. Pitt Rivers conducted methodical excavations and stressed the importance of detailed recordings. He utilized typologies, specialist reports and specialist jargon. His lasting impact on twentieth century archaeology was to set the discipline firmly within an empiricist theory of science (Hodder, 1994: 12).

The inductive approach to archaeological research prevailed throughout the first half of the twentieth century. Implicit in this method is that the facts are self-evident and have an objective reality. It is critical, therefore, that the data be collected in a "theoretical vacuum" in order to ensure a detailed, objective description, which will eventually provide a descriptive synthesis (Hodder, 1994: 12). This method can be compared to a jigsaw puzzle where the data or pieces will eventually fit together and make a larger picture that transcends any particular piece or smaller set of the pieces (Schaasfma, 1989: 40). Thus, the only valid questions to ask of a site is "what is there?" and "what is the whole sequence of events on this site from the beginnings of human activity to the present day?" (Sanderson, 1991: 8).
3.2 "New Archaeology"

The 1960s mark a turning point in the development of archaeology. The influence of new scientific techniques such as radio-carbon dating, as well as ideas from other disciplines such as anthropology, ethnography and geography, brought into the open an underlying dissatisfaction with the way archaeological conclusions were drawn (Renfrew and Bahn, 1991: 34). Not only did it become clear that detailed description was far from an objective pursuit, different people could code data differently and therefore produce different typological schemes, but also the steady collection of data did not seem to be adding to the existing core of knowledge (Hodder, 1994: 13). Moreover, a new generation of archaeologists were no longer satisfied with the traditional explanations based on such things as vague "influences" of one culture upon another, they wanted a broader "processual interpretation" (Renfrew and Bahn, 1991: 35).

Led by the American Lewis Binford, "New Archaeology" espoused the belief that knowledge did not progress simply as a result of the collection of data but as a result of theoretical development (Hodder, 1994: 13). In England the cause was taken up by D. L. Clarke. In his book Analytical Archaeology (1968) he criticized the contemporary approach to archaeology as an

"undisciplined, empirical discipline...an inexplicit manipulative dexterity learned by rote...an immature discipline struggling to find its dimensions and assert its separate existence from bordering disciplines of greater maturity (Clarke, 1968: 14)."

New Archaeologists began to adopt a systems approach to cultural modification in which the culture under study was broken into subsystems such as technology, ideology, trade, and demography (Renfrew and Bahn, 1991: 35). By drawing on the philosophy of science, New Archaeologists began to think in terms of how changes in economic and social systems take place. New Archaeologists sought to explain rather than simply describe
In order to fulfill this aim, New Archaeology utilized a deductive rather than the traditional inductive approach. As a result, archaeological data came to be seen as a resource for testing hypotheses about general propositions (Greene, 1995: 170). Central to this new approach was project design. It was felt that research should be designed to answer specific questions economically, not simply to generate more information which might be irrelevant to the question at hand. As Lewis Binford (1972) stated "What is argued....is that the generation of inferences regarding the fact would not be the end product of the archaeologist's work...once a proposition has been advanced no matter by what means it was reached the next task is to deduce a series of testable hypotheses that, if verified against independent empirical data, would tend to verify the proposition (Binford, 1972: 90)."

The end product of the pursuit of hypotheses testing was the establishment of general laws. "In our search for explanations of differences and similarities in the archaeological record, our ultimate goal is the formation of laws of cultural dynamics (Binford, 1972: 100)." The idea behind this was that archaeology could provide a depth of information that social scientists could not hope to achieve because it was simply impossible for them to witness the evolution of a major process within their lifetime. Process to Binford meant the dynamic relationships that operate among the components of a system or those same components and the environment. In order to deal with process, Binford believed that explanations had to be sought for observed phenomena, and that it was through the explanations of observations that any knowledge about the past was gained (Greene, 1995: 170). Moreover, archaeological explanations could only begin "when observations of the archaeological data were linked through laws of cultural or behavioural functioning to past conditions or events (Binford, 1972: 117)."
Although New Archaeology had a profound affect on the profession, especially in the introduction of rigorous sampling strategies, its commitment to positivist, hypothesis-testing encouraged archaeologists to divorce theory from practice. Self-conscious theoretical argument increasingly came to be the domain of academics (Hodder, 1994: 14). In the 1970s and 1980s many components of New Archaeology, such as problem orientation, hypothesis formation, sampling for the purposes of testing propositions and the detailed collection of data, were seen as luxuries not available to field units working within a rescue context (Hodder, 1994: 14).

3.3 Rescue Archaeology-The Return of Empiricism

Although there were exceptions, excavations in England up until the 1960s were generally a part time activity, conducted by academics, museum curators and amateur enthusiasts. During the 1960s, however, the situation radically changed. There was a growing awareness throughout the archaeological community that the country had begun an unprecedented programme of urban renewal. Increasingly, it became clear that the deep foundations for high-rises, car parks, supermarkets etc were obliterating the delicate strata that existed below ground. In 1971 leading archaeologists came together to form "Rescue", a pressure group whose purpose was to bring to the attention of the public and politicians alike, the scale of the threat to archaeological sites, particularly in towns (Jones, 1984: 20).

The following year the Council for British Archaeology published Carolyn Heighway's *Erosion of History*, which served to document the threat to Britain's archaeological resource. "The seriousness of the present situation in urban archaeology cannot be overstated....The most important towns of all historical periods will be lost to archaeology in twenty years if not before (Heighway, 1972: preface)." The combination of this publication, and other similar studies of individual towns and their particular problems,
and the pressure exerted by Rescue, assisted by the Inspectorate of Ancient Monuments, resulted in an increase in central government funding. This influx of money helped to support the new urban archaeological units in places such as Oxford, York, and London. Thus, a new militant generation forged into the field to rescue the history of urban England (Carver, 1987: 106).

The independence of these units, coupled with the development of their own discourse and disciplinary structure meant that they increasingly became separated from the theoretical debates that continued in academic circles (Hodder, 1994: 15). Many rescue archaeologists felt that deductive research did not apply to their situation. As Lipe (1974: 242) stated, "the [rescue] archaeologist differs from the academic or "pure" problem-oriented researcher in that he must adapt his probable requirements to the body of sites made available to him by society's decision to destroy them."Thus, although some units adopted a research agenda to guide their forays in the field, the vast majority were concerned first and foremost with the rescue of anything and everything (Arup, 1991: 7). The preservation of information was justification in itself, and there was little need to engage in theoretical debate about the eventual interpretation of the data. So once again an empiricist view dominated the field and overshadowed attempts to link theory and data (Hodder, 1994: 15).

By the late 1970s and early 1980s tensions in the profession had become apparent. Rescue archaeology was criticized for its indiscriminate approach to the buried heritage. While some valuable and productive sites had been recovered, more often it was the case that sites already suffering from extensive damage were being excavated at great length, and great expense without useful outcome (Arup, 1991: 7). Improved techniques combined with an empirical attitude resulted in excavators who spent more time and retrieved so much data that it was increasingly more difficult to
synthesize (Arup, 1991: 7). Within and without the profession questions were levelled at its practitioners. "What was the point of the massive build-up of undigested information? Who was the past being saved for in this way? Why did hypothesis-testing not seem to work in practice? (Hodder, 1994: 15)." By the end of the 1970s, "the lack of publication, the ubiquity of archaeological activity, the reliance of government funds......meant that urban archaeology was gradually losing the sense of purpose and public support which had been an important motivation (Arup, 1991: 7)."

3.4 Theoretical Reaction to Rescue Archaeology–Cultural Resource Management and the Return of Research

In reaction to the indiscriminate and indulgent nature of rescue archaeology, the concept of "cultural resource management" or "archaeological heritage management" emerged. This new concept crystallized in the United States, where there was a growing awareness during the 1970s that "there was a need to establish a new philosophical and ethical framework, to identify the academic and social relationships and obligations, and to evolve new methodologies (Cleere, 1989: 4)." The mandate of this movement was to establish dynamic management of the archaeological heritage (Cleere, 1989: 4). Essentially archaeological heritage management is the identification of archaeological remains; the giving of informed advice for the effective management of these remains; and the presentation of archaeological information to the general public (Sanderson, 1991: 5).

Central to the developing conservation ethic was the realization that the archaeological record was a scarce non-renewable resource which was fast disappearing. The finite nature of the resource meant that every effort should be made to preserve and use wisely what was left (Schaafsma, 1989: 43). It was understood that, for practical reasons, not all cultural resources
can be preserved, nor can they all be studied. Choices, therefore, had to be made among cultural materials, and these choices had to be based upon "the best current estimates of which of the cultural resources are most likely to yield resource value in the present as well as in the future (Lipe, 1984: 2)."

The question that emerged was how to determine resource value. William Lipe in his classic paper "Value and Meaning in Cultural Resources" began the discussion by identifying four types of resource value: associative/symbolic, informational, aesthetic, and economic. He hoped that by juxtaposing these four aspects of resource value a dialogue would ensue that would aid decision makers in developing appropriate frameworks for making choices about what should be saved (Lipe, 1984: 2).

The next issue to be addressed concerned methodology. To reiterate, the simple induction method revived during the rescue movement was again considered to be a wasteful illusion. Equally, the rigid hypothesis-testing of New Archaeology was accepted as an inappropriate method as it ignored the fate of the archaeological record that did not directly relate to the overall research problem (Schaafsma, 1989: 44). Finally, a mid-way position emerged which suggested that a guiding research agenda was the logical conclusion. Thus, the situation by the end of the 1980s was how to define resource value within a research driven agenda.

In England, the issues of resource value and research agendas have yet to be addressed adequately. The former continues to be plagued by the limiting definition of "national importance", as well as the problems associated with property rights (see Chapter Two). The latter, although it was addressed to a certain extent by project designs which were required for rescue excavations that were bidding for central government funding, was never fully implemented into the system due to a central government move towards developer funding in the mid-1980s (Steve Roskams interview). Discussions concerning resource value and research priorities
were effectively side tracked in the late 1980s as authorities scrambled to create a policy to deal with a series of crises that resulted from rescue archaeology.

3.5 Policy Reactions to Rescue Archaeology

Throughout the rescue era there were no legal provisions giving archaeologists access to sites prior to development. Access was granted through negotiation, and depended on the goodwill of the developer. In 1979, the central government responded to the issue of access by passing the Ancient Monuments and Archaeological Areas Act 1979. A provision in this legislation guaranteed the investigating authority access to designated areas prior to development in order to conduct an archaeological excavation for a period of six months (see Chapter Two). Thus, it was the case in the five historic towns chosen as test cases that the local authorities saw archaeology as none of their concern and left it up to the investigating authority.

This *laissez faire* attitude of the local authorities continued until three highly publicized sites brought the limitations of this approach to the fore. Two of the three sites were located in London, and one in York. In all three examples planning permission was given with no consideration for the potential of the archaeology on the site. In the cases of the sites in London, a magnificent Roman bath building, and the Rose, a Shakespearean theatre, were unearthed during the mandatory excavations. In the case of York, some of the largest and most substantial remains of Roman buildings in northern England were identified.

It was clear that the six month provision for excavation in the 1979 Act was simply inadequate in all three circumstances. Confrontations took place between archaeologists and developers, and it was not long before the media picked up on the situation. An article in the *Yorkshire Evening Press*
on December 16 recorded that:

"Bulldozers moved onto the Micklegate site today to begin work which will destroy eleventh century medieval buildings and shop fronts of national archaeological importance. Developers will soon drive 56 piles through the Viking and Roman remains -a process compared by a York Labour Party spokesman, Mr. Hugh Bayley, to "hammering blunt nails through the Leonardo Cartoon."

In the end, however, there was little that could be done. English Heritage's unwillingness to schedule the sites due to the potential liability for large compensation payments, meant that the remaining archaeology in all three cases was destroyed as development was allowed to continue (Ottaway, 1992: 93).

As a result of these three sites, it became clear that the uncertainty concerning the presence or absence of archaeological remains had to be kept to a minimum. To achieve this objective, decisions concerning archaeology had to become the responsibility of local planning authorities. It was believed that by assessing the implications for archaeology when development proposals were put forward by prospective developers the situations that had occurred in London and York would be avoided (Wainwright, 1993: 416). To facilitate the necessary devolution of power, the Department of the Environment in November 1990 issued Planning Policy Guidance: Archaeology and Planning (PPG 16).

This document "sets out the Secretary of State's policy on archaeological remains on land, and how they should be preserved or recorded both in an urban setting and in the countryside (DoE 1990: Paragraph 1)." PPG 16 is not a piece of legislation, it is a guidance note for planning authorities, property owners, developers, archaeologists, amenity societies and the general public. PPG 16 not only confirms that archaeology is material to planning considerations, but puts archaeology firmly on the centre stage of the planning system. The importance of PPG 16 is it
supplies, for the first time, a cogent framework for the handling of archaeological remains and discoveries.

Similar to the archaeological heritage management movement, PPG 16 emphasizes the non-renewable nature of archaeological deposits and therefore the need for sound management (Breeze, 1994: 54). The guiding principle of this document is that "where nationally important archaeological remains, whether scheduled or not, and their settings, are affected by proposed development there should be a presumption in favour of their physical preservation (DoE 1990: Paragraph 8)." In other words, preservation in situ is the best possible approach, and only when this is not possible should preservation by record (read excavation) take place. It is through this principle that the policy attempts to reconcile the needs of archaeology and development.

In addition to PPG 16, English Heritage has launched a series of urban surveys. These surveys have to date taken place in five urban areas (London, York, Chester, Cirencester and Durham) which have significant development pressures, coupled with the existence of archaeology characterized by chronological depth, and good survival (Wainwright, 1990: 4). The purpose of these surveys is to provide the local authority with an in depth examination of the survival of archaeological deposits; an archaeological and historical framework against which the deposit survival can be set; and the formulation of strategies for the management of the archaeological resource (Wainwright, 1990: 4).

### 3.6 Local Planning Responsibilities

Included in the body of PPG 16 is a decision-making route along which planners should travel (Grenville, 1994: 128). This route is based upon early discussions between developers and the local authority, and begins with an assessment of the site based on information gleaned from the local Site and
Monuments Records, as well as other relevant documentation. If there is doubt concerning the archaeology then the developer is required to pay for an on site evaluation. This exercise is described as a "rapid and inexpensive operation, involving ground survey and small-scale trenching...[which] help to define the character and extent of the archaeological remains that exist in the area of a proposed development (DoE 1990: Paragraph 21)." As a result of the information gathered from these sources either the archaeology is preserved in situ or appropriate and satisfactory arrangements are made by the developer for the excavation and recording of the archaeological remains and the publication of the results (Biddle, 1994: 5). Where the developer is a non-profit organization, and is unable to raise the funds for excavation and recording, or in the case of an individual who similarly does not have the means to fund such work, an application for financial assistance may be made to English Heritage (English Heritage, 1991: 2).

While this document outlines the process for incorporating archaeology into planning decisions, the policy stipulates that

"development plans should include policies for the protection, enhancement and preservation of sites of archaeological interest.....These policies will provide an important part of the framework for the consideration of individual proposals for development which affect archaeological remains and they will help guide developers preparing planning applications (DoE 1990: Paragraph 15)."

In other words, PPG 16 is not intended to work in isolation. It is expected that local authorities will develop policies for the inclusion of archaeology in the planning process. Thus, planners at both the county and local levels, must now be concerned with how to incorporate the guidelines set out within PPG 16 into their Structure Plans and Local Plans respectively. In England, Local Plans have four main functions:

1) to develop the policies and the general proposals of the County Structure Plan and to relate them to precise areas of
2) to provide a detailed basis for development control;
3) to provide a detailed basis for coordinating the development and other use of land;
4) to bring local and detailed planning issues before the public.

Because PPG 16 makes it clear that the impact of development proposals upon archaeological deposits is a material consideration in determining planning applications, planners must now consider how to balance this "material consideration" with the need for economic regeneration via the development process.

Beyond the policy level, planners and local authorities must also consider the more detailed issue of how archaeological deposits can be managed within the legal basis for developing property. As the research for the case study indicated local planning authorities must tread carefully when attempting to enforce policies that may be seen as impeding development. The central problem concerns the legal concept of "reasonableness." The underlying presumption of the British planning system is that development should be allowed to proceed with little interference (Jane Grenville interview). Thus, planners must now be concerned with the issues of how to enforce the preservation of the archaeological heritage at the development control level.

In addition to policy creation and development control, planners must also consider their role as mediators. To reiterate, PPG 16 is based upon the premise that developers will engage in early consultations with local planning authorities. This means that planners must be well versed in all the material considerations that could affect a development proposal, and must be able to coordinate the pertinent resources within the local authorities to ensure that the archaeological heritage is protected while development proposals are not delayed unnecessarily.
Furthermore, planners must also accept the responsibility of communicating these new initiatives to the general public. Since there is the potential that development could be impeded by archaeological considerations, planners must be able to justify this position to the public. They now have a crucial role to play in cultural leadership, and therefore would be expected to engage the public in a dialogue regarding their local history and the importance of directives that seek to safeguard this valuable community resource. As the research demonstrates, however, planners and local authorities have not responded effectively to their new role as cultural leaders, and have in fact neglected this important duty. It would appear that local authorities and planners maintain the opinion that their only responsibility for the archaeological resource is via the planning process, and that is up to the archaeological community to educate the public constituency about the country's buried past and any relevant protective measures.

Finally, planners must now evaluate archaeological considerations in larger economic terms. As the aforementioned discussion demonstrated, the primary reasons for adopting PPG 16 were to alleviate the uncertainty, as well as the costly delays to development that were occurring as a result of local authorities not taking archaeological deposits into account when evaluating development proposals. Planners must now take into consideration the costs and benefits that an archaeological policy can have on the local economy. Although local authorities now find themselves in the position of curators of archaeological deposits, they are obviously concerned about how to protect this heritage while facilitating development. As the research for the case study indicates, when PPG 16 first appeared, and local authorities began to integrate the guidance into the planning process, there were occasions when the costs of archaeological considerations impeded development. Although, this has been the exception rather than the rule,
there is the belief that should the necessary means to mitigate the presence of sub-surface deposits deter a large scale development, there is the potential that the policies underlying local initiatives and PPG 16 will be contested in court.

On the positive side, the research also indicates that archaeology in its various manifestations, for example excavations and museums, can play a significant role in a local economy. Tourism accounts for a large proportion of England's economic pie, and although the "heritage industry" has been criticized in recent years (see P. Wright On Living in an Old Country and R. Hewison The Heritage Industry: Britain in a Climate of Decline) it is nonetheless a vital and growing industry. Therefore any resources, including archaeology, that could enhance the tourist appeal of a locality should not be discounted or overlooked. It is important from a planning perspective, therefore, that all the relevant issues be taken into account.

Although PPG 16 is to be praised for making archaeology a material consideration in the planning process, much of the responsibility for the survival of archaeological sites and landscapes lies with local authorities. To reiterate, PPG 16 is a non-statutory document that only provides local authorities with advice. It is up to planning authorities how this advice is incorporated into their Local Plans, which is the only real statutory defence for the protection of archaeology. Thus, it is within this context that the City of York undertook to write Conservation Policies for York: Archaeology which will be discussed in length in the following chapters.
CHAPTER FOUR

YORK: ITS HISTORY AND ARCHAEOLOGY

The City of York is located approximately 200 miles north of London, near England’s east coast (see Map 1). Strategically situated between the rivers Ouse and Foss, the city has been an attractive location for human settlement for nearly 2000 years. York began as a Roman legionary fortress, and then became a Roman *colonia*. Later, it served as an important post-Roman centre, as well as the capital of the Anglo-Scandinavian kingdom. Finally, York was the city second only to London in importances for much of the medieval period.

As a result of its long period of occupation, York has some of the richest archaeological deposits in England. The depth of deposits range from 0.5m in suburban areas, to 2.5m in the city centre, to nearly 6m along the banks of the Ouse and the Foss (Arup, 1991: 17). Moreover, the deposits are generally considered to be in an excellent state of preservation, particularly for the Viking and early medieval periods, and are coherent, or legible (Hall, 1994: 27-28; Arup, 1991: 18-20).

Before discussing the City’s archaeological policy it is worthwhile to place York in its historical setting. This commentary will not only enable a greater appreciation for the importance of managing the city’s archaeological resource, but also an appreciation for the complexity of the issues surrounding archaeological heritage management. This survey will concentrate on four periods: Roman, Anglian, Anglo-Scandinavian and Medieval. The following discussion is restricted to these periods as there is no firm evidence for any human settlement in York preceding the Romans, and the post-medieval and modern periods in York do not relate directly to the sub-surface resource.
4.1 Roman (1st to 4th centuries AD)

York was founded in AD 71 by the Ninth Roman Legion, approximately twenty-eight years after the initial conquest of England. The task of the legion was to establish a base in the north from which the defence and administration of northern England could be organized. York, or Eboracum as it was known to the Romans, was the obvious site for the establishment of a northern headquarters as it was an easily defended site at the junction of two rivers, and allowed for good communications with the Roman province to the south (Nuttgens, 1974: 5). Map 2 illustrates all Roman sites located in York to date.

Once the site was chosen, the first task was to build a fortress to provide accommodation for the men and equipment of the legion. The fortress was located on the north-east bank of the river Ouse (Ottaway, 1993: 11). Initially constructed of timber, the legionary fortress was rebuilt in the second century AD in stone (Arup, 1991: 23). The fortress was an enclosure shaped roughly like a playing card, and would have been approximately fifty acres in area (Nuttgens, 1989: 12). The structure would have been divided into two distinct elements: the interior space used for buildings and streets and, the defensive envelope consisting, in the first century, of a rampart and ditch (Ottaway, 1993: 26).

Although York was established as a military site, and remained the headquarters of the northern military command, it became an important centre for the development of the north (Nuttgens 1974: 5). Orthogonal roads were constructed that lead north-west, north-east and south-west across the Ouse (Arup, 1991: 23). It is generally agreed that during the late first and second century a civilian settlement grew up around the fortress, probably on its south-east side. Initially this settlement would have consisted of simple timber buildings housing local people trading with the army (Ottaway, 1992: 82). Over time the settlement would have become
MAP 2

ROMAN YORK

LOCATION OF SITES

- Controlled excavation
- Observation with details of structures or dating
- Observation - exact location known
- Observation - exact location unknown
- Cemeteries
- Roads, numbered as in Eboracum (RCHM 1962)

Scale 1:10000

more substantial, and it is believed that the Roman waterfronts, as well as large public buildings such as theatres, amphitheatres, temples and shops would have been located in this area (Andrews, 1984: 175). In addition to these buildings, other more mundane, albeit substantial, structures would have been constructed. For example, in 1972 a major duct of the sewage system was located. It was built using masoned blocks of millstone grit and was large enough for a person to walk down (Carver, 1987: 33).

By 213 AD a more substantial civilian settlement began to grow up on the south-west side of the River Ouse (Arup, 1991: 23). This settlement was known as the *colonia Eboracensis*, which indicated that it was a chartered town of the highest rank, equivalent to Colchester, Gloucester and London (Nuttgens, 1989: 14). It is likely that York gained this elevation in rank when it became the capital of lower Britain or *Britannia Inferior* during the reign of Emperor Caracalla whose father, Septimius Serverus, had died in York in 211 AD (Ottaway, 1992: 83).

Very little is known about the layout and development of the *colonia*. To date none of the principal buildings have been positively identified. Evidence, however, from fragmentary remains of substantial stone buildings suggest the presence of large public buildings such as temples and theatres, and a forum and basilica complex (Andrews, 1984: 176). It is also believed that the *domus palatina* mentioned in contemporary sources, which would have been the residence for the Emperor while visiting York, was located in the vicinity of the *colonia* (Nuttgens, 1989: 14).

The other substantial archaeological features left by the Romans in York were their cemeteries and funerary monuments. As a result of nineteenth century building work, burials have been found on all sides of Roman York, both around the legionary fortress on the north-east side of the River Ouse and around the *colonia* on the south-west (Andrews, 1984: 176).
4.2 Anglian (5th to 8th centuries AD)

The Roman administration left Britain in 410 AD. There is very little archaeological evidence to indicate activity in York between 400 AD and 700 AD (Arup, 1991: 24). The main difficulty is that archaeological deposits of this period are "comprised typically of dark featureless layers containing bits of worn Roman pottery which have accumulated over Roman streets and buildings (Andrews, 1984: 178)." The evidence that does exist indicates that much of the Roman town was still standing during this period, and suggests that settlement continued in the fortress, in the suburbs and on the waterfront (Arup, 1991: 24). However, the absence of Anglian occupation material supports the premise that the settlement was never very large (Andrews, 1984: 178).

From 700 AD to 850 AD, more plentiful and recognizable finds suggest an increased level of activity in York (Arup, 1991: 24). While a few sherds of pottery and coins provide evidence to support the literary and historical evidence that refer to York as a trading town of artistic and craft excellence, as well as a flourishing ecclesiastical centre, the most remarkable find to support this description is the famous Coppergate helmet found immediately outside the south-east defences of the fortress (Ottaway, 1992: 131). The main body of the helmet is composed of eight iron plates riveted together. It has two hinged cheek pieces and the wearer's neck was protected by a curtain of chain mail. It is edged and decorated with strips of brass and fine relief work. An inscription on the helmet is thought to say:

In the name of our Lord Jesus Christ and of the Spirit of God, let us offer up Oshere to All Saints. Amen.

It is suggested that the reference to All Saints concerns the church of All Saints, which was probably an Anglian church outside the royal enclosure in the Roman fortress. If this theory is accurate, it is likely the helmet bore a religious invocation to the local church in order to protect the owner.
Oshere (Ottaway, 1992: 131). Map 3 shows the location of archaeological data for Anglian York.

4.3 Anglo-Scandinavian (9th to 11th centuries AD)

York was first captured by the Vikings in 866 AD, and became one of the great cities of the Viking world (Hall, 1994: 15). In chronicles of the period York, or Jorvik as it was known at this time, was a centre for first Viking kings and later, as the two cultures fused, for Anglo-Scandinavian earls. In essence, Jorvik was the centre of Scandinavian power in England (Hall, 1994: 15). Map 4 shows the distribution of archaeological information for this period.

Excavations at Coppergate, near Parliament street (see Map 5), demonstrate that this area was most probably the centre of the Viking town. The evidence has revealed a robust settlement supported by a number of trades and crafts (Andrews, 1984: 180). Buildings were constructed with earth-fast posts with wattles woven between; the floors were beaten earth and the roofs presumably thatched (Ottaway, 1993: 149). In and around these buildings large quantities of metalworking debris, including slag, bars and strips of metals were found. There is also evidence in the form of incomplete and finished bowls and cups, as well as iron combs, spindle whorls and loom weights to suggest that the wood-working and textile industry were also located in this vicinity (Ottaway, 1993: 151).

As a result of examining the buildings and plot boundaries which run up to street frontages, it can be discerned that Viking York was a period of major replanning which gave the city a new shape and plan that continues today (Hall, 1994: 36). The main change in layout in the Anglo-Scandinavian period was the realignment of the main Roman street of the colonia in the south-west, to the north-east to a river-crossing downstream from the original Roman site (Hall, 1994: 36). This road line continued north-east
MAP 5

CONTEMPORARY YORk
MAIN STREETS WITHIN AND AROUND THE MEDIEVAL WALLS

before meeting the line of another Roman street which ran between the south-west side of the Roman fortress and the River Ouse (Ottaway, 1993: 148).

It is estimated that the population in York at the turn of the tenth and eleventh centuries was close to 10,000, making York a significant settlement for the day (Nuttgens, 1989: 22). As the population continued to rise, the remaining Roman structures were demolished to provide building materials (Ottaway, 1993: 148). At first lesser streets would have been constructed in and around the established settlement in Coppergate, and then expansion would have taken place into nearby suburban areas. Although there is no material evidence to date, it is believed that the Anglo-Scandinavian settlement extended east of the Foss and south-west of the Ouse (Andrews, 1984: 181).

In political terms, the year 1069 AD marks the end of Viking Age York. In that year the Normans under William the Conqueror captured the city, and as it is often the case in war, York suffered tremendous damage. To repel Danish and Northumbrian warriors the Normans started a fire that destroyed much of the city. Although the the city suffered extensive damage, the end of Viking Age York did not herald a total and immediate change in all aspects of life in the city (Hall, 1994: 20).

4.4 Medieval (12th to 16th centuries)

Little is known archaeologically about the early Norman city. Contemporary chronicles suggest that the population had been depleted as a result of the war, and those that did survive were economically depressed (Andrews, 1984: 182). Thus, it is believed that the topography of the Anglo-Scandinavian city continued virtually unchanged with only two significant alterations: the building of the Norman Minster church, and the construction of two castles on either side of the river Ouse.
MAP 6
MEDIEVAL YORK
LOCATION OF SITES

Once peace and stability had been secured the city began to reassert itself. Suburban settlements were founded at Fishergate, Bootham, Gillygate, Marygate, Layerthorpe and Monkgate (see Map 6 and refer to Map 5). One of the most important legacies of the Normans was their religious foundations (Nuttgens, 1989: 30). In fact, by the end of the twelfth century all of the city's medieval churches had been established. In addition to these religious centres, many large ecclesiastical centres were constructed: St. Mary's Abbey, the Priory of Holy Trinity, St. Leonard's Hospital, and the Priories of St. Andrew and St. Clement (Andrews, 1984: 183).

The next 200 to 300 years were York's golden age. Its geographical position on the navigable river Ouse and at the centre of important land routes made it the natural focus for social, political, religious and economic activities (Andrews, 1984: 183). For most of the time it ranked second in the kingdom only to London, and from the late 13th to late 14th century it was intermittently the seat of national government. In addition to its central role in secular administration, York was also an archiepiscopal see and an ecclesiastical centre of considerable importance (Andrews, 1984: 183). All of this activity had obvious economic spinoffs as people involved in the government and church required goods and services. Moreover, York became an important centre for the wool trade and the craft industry, in particular for foundries, pewterers, and glaziers (Andrews, 1984: 183).

This prosperity was reflected in the extensive building programs that took place. York Castle and the city walls were reconstructed in stone and much of the present Minster was built during this period. Many churches and other religious establishments were refurbished or enlarged, and many fine guild halls were constructed. The influx of people to the city meant that many of the residential areas of York were further expanded (Arup, 1991: 25).

During the following centuries York began to lose its competitive edge
in world markets as the river Ouse began to silt up. For a time the city was able to live off its earlier prosperity and remained a market town; but, without its role as an international port York's importance waned. It was not until the nineteenth century and the coming of the railway that York was able to regain some semblance of its previous status (Nuttgens, 1989: 96).
CHAPTER FIVE

CASE STUDY: "CONSERVATION POLICIES FOR YORK: ARCHAEOLOGY"

A SUMMARY

As the preceding chapter has demonstrated, York is a historic town with a rich and varied archaeological heritage. These characteristics make York a town of international importance and renown. This archaeological heritage, however, lies beneath a town that wants to continue into the 21st century as a thriving centre. The past, therefore, must be accommodated within this plan for a vibrant future (YCC, 1992: 3).

In the wake of PPG 16 and the realization that the most responsible way to deal with archaeological matters is at the local level, through the planning process, the City of York developed a policy which seeks to ensure that "archaeological deposits will be preserved wherever possible (YCC, 1992: 3)." The policy attempts to set this objective within an overall context which does not fossilize the City. The success of the document depends upon its ability to reconcile the various conflicting attitudes to the archaeological heritage of York (YCC, 1992: 3). These conflicting attitudes are embodied within:

1) The local community which has the expectation that York City Council will ensure that the archaeological legacy of York will be preserved for future generations.

2) The development community which has the expectation that York City Council will ensure that developments can be executed with a reasonable degree of certainty and consistency.

3) The scientific community which expects that the fragile and finite archaeological resource will not be unnecessarily destroyed and that the York City Council will provide reasonable opportunities for the study and advancement of knowledge of the archaeological resource (YCC, 1992: 4).
It has been as a result of past conflicts among these three groups that the loss of research, the loss of development opportunities and the loss of community heritage has taken place. Thus, York's archaeological policy seeks to accommodate the reasonable expectations of these interested parties. The purpose of this chapter is to provide a brief summary of the policy.

The City of York believes that it can accommodate the various interests within the community through the following three objectives:

1) promoting development  
2) conserving the archaeological resource  
3) managing the archaeological resource  

In order to achieve these objectives the City has adopted the following mechanisms which will be discussed in turn:

1) archaeological evaluations and mitigation strategies  
2) engineering and foundation methods  
3) provisions for research excavations  
4) an efficient and unambiguous planning process  

5.1 Archaeological Evaluations and Mitigation Strategies  

Prospective developers are expected to include certain documentation with their planning applications. In terms of archaeology, this documentation consists of archaeological evaluations, and mitigation strategies. The information encompassed in these documents is intended to provide the City and prospective developers with the means to provide for development while managing the archaeological heritage.
When a site is thought to have important sub-surfaces deposits an archaeological evaluation is required. An archaeological evaluation is an assessment of the site describing the nature, quality, and level of preservation of the archaeological deposits. This evaluation will normally be produced in accordance with documentation supplied by York City Council (see Appendix C).

To determine the potential of a site's deposits, an initial desktop analysis is undertaken by the City's Principal Archaeologist, who works within the planning department. The desktop study includes an examination of the archaeological database and the geological database. This examination provides the Principal Archaeologist with the necessary information to assess the archaeological importance of most sites.

The information for the databases has been derived largely from previous site investigations, as well as the archive of excavations and observations held by the York Archaeological Trust. Other sources of information for the databases include the Royal Commission for Historic Monuments (England) volumes on York; the Yorkshire Philosophical Society Annual Reports; and various other published sources (YCC, 1992: 16). At present, the databases contain over 1000 records. "The City considers the information within these databases to represent the minimum dataset which can be used to generate a model of the archaeological deposits of the city (YCC, 1992: 17)." It is a priority of the City Council to ensure that the databases are maintained and updated in order to ensure that they remain an authoritative source of information.

The on-site work is carried out with reference to written specifications provided by the York City Council (see Appendix C). Depending on how much additional information is required, the on-site work for an evaluation will include all or some of the following: small-scale trenches; boreholes; and, if possible, remote sensing surveys. It is the
responsibility of the developer to commission and pay for an evaluation.

Since it is accepted that it is reasonable to allow developers to choose an archaeological contractor, either by competitive tendering or by commissioning the work, the archaeological policy for York also sets out the City Council's provision and standards for archaeological services. In order to ensure that archaeological work is carried out according to accepted professional standards, the following policies have been adopted:

1) York City Council has developed and maintains a list of suitably qualified archaeological contractors, consultants and specialists who are competent and who are willing to work in York. This list is made available to applicants, developers and their advisers (YCC, 1992: 31).

2) York City Council has adopted existing statements of standards and best practice to which it expects archaeological contractors, consultants, and specialists will adhere to. These include:

   The Institute of Field Archaeologists Code of Conduct;

   The Institute of Field Archaeologists Code of Practice for those involved in Competitive Tendering;

   The British Developers and Archaeologists Code of Practice;

   The standards agreed by the York Castle Museum, the Yorkshire Museum, and the York Archaeological Trust concerning the processing and handling of finds;

   United Kingdom Institute of Conservators Standards;

   English Heritage guide-lines on the recording, sampling, conservation, and curation of structural wood;


3) "Where there are no existing national or local statements of standards which can be adopted, York City Council will formulate its own statements on standards to guide those engaged in archaeological work (YCC, 1992: 31)."
4) "York City Council will monitor all archaeological work in the city to ensure that these standards are being maintained. Any contractors, consultants and specialists who do not follow these guidelines will be excluded from the City's list (YCC, 1992: 31)."

Once an evaluation has been completed and the information indicates that important archaeological deposits exist on the site, then the process of designing a suitable structure or substructure begins. The City expects that a developer will provide a statement and supporting documentation detailing how disturbance of the deposits will be kept to a minimum and what steps, including any further archaeological work, will be taken (YCC, 1992: 12). In addition, an agreed statement on working methods for piling and building contractors on-site is required. It is hoped that the statement on working methods will ensure that the process of piling and construction does not lead to destruction of deposits over and above that which the City and the developer have agreed (YCC, 1992: 12). This statement and documentation is referred to as a mitigation strategy.

The mitigation strategy is intended to work within the City's objective of disturbing or destroying no more than 5% of York's surviving archaeological deposits. It is expected that development proposals will create foundation designs and piling designs to meet this expectation. On sites where, due to the particular topographical and archaeological characteristics, this 5% limit of destruction cannot be met, one of two decisions will be taken: the development will be refused; or, the development will be approved but with the requirement that the developer will fund a rescue excavation in order to record and analyse the deposits before destruction occurs. It is expected that the developer will also fund the publication of the results of the excavation, and will deposit the archive with the Yorkshire museum (YCC, 1992: 35). In this situation, "the proposal will be considered on its merits, weighing the importance of preserving the
archaeological deposits against all other material considerations (YCC, 1992: 35)." These other material considerations invariably refer to the importance, most likely in economic and political terms, that the City Council would give to the proposed development.

5.2 Engineering and Foundation Designs

To reiterate, York City Council believes that through creative and flexible engineering and foundation designs the City's objectives of promoting development and conserving 95% of the archaeological deposits intact can be achieved. In York the soil conditions are such that piles are the preferred foundation type (YCC, 1992: 33). This is believed by some to be advantageous for archaeology, as piles occupy the minimum plan area, and can be reused. Thus, there is no basic clash between the type of foundation appropriate for the sub-soil and the types of foundation appropriate for the preservation of sub-surface archaeology (Arup, 1992: 47).

When designing foundation structures, the City Council suggests that a developer refer to the York Archaeology and Development Study. One of the purposes of this study was to set out engineering schemes to enable preservation of archaeology in situ. The following excerpt from York's archaeological policy provides greater detail regarding the engineering and foundation approaches expected by the City Council:

"Ground floor slabs can be either suspended or supported by the ground to suit particular sites. The grid positions of the piles will be affected where the ground floor has to be suspended because of ground conditions. The pile grid should, however, be no smaller than 6m x 6m.

The largest column in a superstructure can be transferred to a single pile 1050mm in diameter. This demonstrates that there is no need to use pile groups, which inevitably cause much greater destruction of archaeological deposits. Where a building has widely spaced columns, the piles under those columns would have to be correspondingly larger. The use of large spans does not normally require deep ground beams. Such beams can damage and destroy large amounts of archaeological deposits.
The requirements for large spans should only apply to the structure above ground. The system below ground should have a smaller grid. Where single piles are used on a 6m X 6m grid of single piles is suitable both for the economic support of a suspended slab and superstructure and for the preservation of 95% or more of the archaeological deposits on a site.

The overall objective is to limit and contain damage to archaeological remains within the cross-sectional area of the piles. Any damage to remains in the area surrounding the pile should be avoided. Therefore, it is essential that the correct piling system be used. This system should be capable of penetrating obstructions in the ground. This requirement will rule out a system such as continuous flight augered piles. The most suitable pile types are bored cast-in-situ piles. These are bored either by percussion method or by augering. A permanent or temporary casing should be used within the made-up ground to support the sides of the bore. When obstructions are encountered these can be broken through. The breaking can be done either by using chisels or by coring through the obstruction using a core barrel. Coring is preferable to chiselling, but it is a more expensive option (YCC, 1992: 33-34).

5.3 Provision for Research Excavations

York's policy states that "York City Council will encourage...non-destructive archaeological research projects (YCC, 1992: 27)." The policy lists the non-destructive research projects that it believes are appropriate for furthering archaeological research. These projects include: remote mapping, a documentary and architectural survey of medieval buildings, artifact assemblages, a sampling programme in riverside and pool or bog deposits, and a hinterland survey. However, this encouragement is based upon proactive involvement on behalf of the archaeological community. The City Council does not intend to take a leadership role in the instigation of these projects.

A unique feature of York's archaeological policy is the provision, within the planning process, for research excavations. Excavations are crucial because very little of the past can be understood by studying the finds alone. This is because the key to archaeology is context:

"the buildings that can be detected but not preserved; the
skeletons which cannot be lifted as they lie; the soils which inter-leave with one another and provide the stratified sequence; the location of sampling points for finds, such as pollen and insects which are too small to see and have to be extracted in the laboratory (Arup, 1991: 28)."

In order to incorporate the potential for research excavations the City has adopted a "cogent research agenda (YCC, 1992: 18)." This agenda is founded upon a specific definition of archaeological value. In this definition archaeological value is a "function of the relationship between the quality and preservation of archaeological deposits and the potential to address areas highlighted in the research agenda (YCC, 1992: 18)." This means that an excavation may occur "when deposit quality and research objectives coincide in sites where complete preservation of the deposit is undesirable or incompatible with the agreed development or where the promotion of the city of York through a public excavation project is desirable (Arup, 1992: 36)."

The research agenda is based upon a series of papers that were prepared for the York Development & Archaeology Study. These papers concerned the following topics:

(a) The hinterland
(b) The environmental sequence
(c) The Roman period
(d) The early Middle Ages
(e) The Medieval period

As a result of these papers an agenda was created which defined the most pressing research questions for each subject. In some cases formal research excavations are the only means available for answering specific questions. The City of York's policy for archaeology has adopted the following agenda from the York Development and Archaeology Study (see Map 7) (Arup, 1991: 31-32):
MAP 7
RESEARCH ZONES WITH ARCHAEOLOGICAL CONTACT POINTS

Zones 1, 2 or 11: Sites containing proven legible Roman, Anglian, Anglo-Scandinavian or Medieval strata in available areas of 20x20 meters or more.

Zone 4: Sites containing proven legible Roman, Anglian, Anglo-Scandinavian or Medieval strata in available areas of 30x30 meters or more.

Zone 6: Sites of any size containing proven tangible evidence for waterfront structures.

Zone 8: Sites containing proven legible Roman, Anglian, Anglo-Scandinavian or Medieval strata in available areas of 10x20 meters or more.

Zone 9 & 10: Sites of any size containing proven tangible evidence for waterfront structures.

Zone 11: Sites containing proven legible Roman, Anglian Anglo-Scandinavian or Medieval Strata in available areas of 30x30 meters or more.

Zone 12, 14, 15, 16, 17, 18 & 19 Sites containing proven legible Roman, Anglian, Anglo-Scandinavian or Medieval strata in available areas of 30x30 meters or more.

Zone 20: Sites of any size which become available for excavation.

All Zones Any site containing late Roman buildings
Any settlement nucleus of the Anglian period.
Any Early Medieval or Medieval church and its cemetery. Any Roman cemetery.

By adopting this agenda the City of York has provided that the possibility of formal research excavations may be considered when sites meet the above criteria. The integration of the research agenda into the planning process will be discussed in the following section.

5.4 The Planning Process

York City Council has adopted procedures which ensure that archaeological issues do not delay the determination of planning applications. The procedures that have been integrated into the planning
FIGURE 1

ARCHAEOLOGICAL PROCEDURES IN YORK

Does your site lie in the AAS? 
Yes 
No

Does your site meet the criteria for archaeological intervention in the AAS? 
Yes 
No

Contact York City Council's Principal Archaeologist on (0904) 613161 ext. 1346 who will provide a preliminary archaeological assessment and advise you either that:

- the site has archaeological potential and a watching brief will be necessary
- York City Council will provide you with a written specification for this watching brief
- You should obtain an estimate from an archaeological contractor to cover the implementation of this specification

- the site is of no archaeological value
- York City Council will provide you with a written specification for this evaluation
- You should commission and pay for an archaeological contractor to implement the specification
- You should use the information provided by the evaluation to create a Suitable Mitigation Strategy (MS). This will consist of a building and foundation design which will preserve 95% of the archaeological deposits and any further archaeological work which is necessary. York City Council will advise you on this process. The MS should form part of the planning application.

Planning Application taken to Planning Committee

If application is approved the specification for the watching brief will normally be covered by a planning condition.

Scheme implemented with appropriate archaeological response.

If application is approved, the MS will normally be included in Section 106 agreement.

No further action necessary. Archaeology is not an issue which Planning Committee needs to consider.

Source: YCC (York City Council), 1992.
process in York draw heavily on the advice contained within PPG 16 (YCC, 1992: 37). Figure 1 illustrates the planning process in York.

The process is founded upon early consultation between prospective developers and the Development Advisory Service of York City Council. As a result of these consultations the area planner will brief the Principal Archaeologist, who then consults the archaeological database to determine the initial archaeological response to the inquiry. This step is critical, as planning applications not accompanied by the necessary documentation will be withdrawn until such documentation is provided.

Where the site has limited archaeological potential or where the proposed development will have limited impact, a watching brief may be the only archaeological requirement. A watching brief is simply an on-site record taken by a qualified individual during the course of a development. A written specification for the watching brief will be provided by York City Council. The cost of a watching brief is expected to be met by the developer.

Where the site is determined to have important archaeological deposits, and the proposed development is of a scale and nature where archaeological deposits could be destroyed, an archaeological evaluation will be required. To reiterate, a written specification for the evaluation will be provided by York City Council (see Appendix C), and the costs of the evaluation are expected to be met by the developer.

The results of the evaluation provide the necessary information for determining the appropriate response, or mitigation strategy, for conserving the archaeological heritage. This response will normally take the form of sensitive foundation and engineering designs; however, if necessary an archaeological excavation may be required. In the case of a rescue excavation the developer would be required to fund such a project. The evaluation and the mitigation strategy will form part of the planning
application and will be submitted to the Planning Committee with the recommendation of the planner in charge and the Principal Archaeologist.

If the evaluation indicates that the site has the potential to meet the criteria contained in the City's research framework, York City Council will advise the developer that he/she has the option of offering the site to the archaeological community so that it can attempt to raise the necessary funds to undertake a research excavation.

Funding is obviously a critical component of a research excavation. The current situation for funding relies upon English Heritage and private sector support. Funding from these sources obviously depends upon the merits of the site's archaeology and the significance of the deposit. Other potential sources for funding include research foundations, trusts, non-governmental institutions, as well as, in the case of internationally important remains, the EEC (Arup, 1991: 75).

If the funds are not forthcoming, the development will be allowed to proceed as long as all other conditions have been satisfied. If, however, funds can be found then a separate planning application is required to cover the proposed research excavation. Planning permission for a research excavation depends upon the following criteria: that the research design of the excavation meets the requirements of the research agenda adopted as part of the policy; that the project is adequately funded; and that the project will be carried out to the highest professional standards (YCC, 1992: 12-13). Similarly, if a landowner wishes to undertake an excavation or allow access for an excavation to take place on his/her land, a planning application fulfilling the aforementioned criteria would be required.
CHAPTER SIX

CASE STUDY: "CONSERVATION POLICIES FOR YORK: ARCHAEOLOGY"
AN ASSESSMENT

Based upon a series of eighteen in person interviews conducted with individuals from the public sector, the private sector, the academic sector, and amenity groups, this chapter will assess and evaluate Conservation Policies for York: Archaeology, as outlined in the previous chapter. The intention of this assessment is to determine the success of the policy in terms of an overall planning framework that allows planners to meet the requirements of the living community, while preserving the archaeological heritage; as well as the policy's success in meeting its own aims and objectives (see Figure 2). In order to accomplish this task the following lines of inquiry will be examined:

1) The role of stake holders
   a) creation of the policy
   b) ongoing involvement

2) Implementation of the policy
   a) the role of planners
   b) inter-governmental involvement
   c) politics and the policy
   d) monitoring and updating

3) Implications of the policy
   a) for development
   b) for archaeology
   c) for tourism

4) Reactions to the policy
   a) government and archaeology
   b) importance of the policy
FIGURE 2
POLICY STATEMENT SUMMARIES
“Conservation Policies for York: Archaeology”

A1. York City Council will seek to secure the development of sites within the city while at the same time conserving archaeological deposits.

A2. Developments which disturb or destroy more than 5% of the archaeological deposits contained within the boundaries of an application site will normally be refused.

A3. Applications which lie within the Area of Archaeological Importance or are covered by policy A8 will be expected to supply the following information at the time of application:
   (A) an archaeological evaluation of the archaeological deposits (this will normally be produced in accordance with documentation supplied by York City Council);
   (B) a statement and supporting documentation indicating how disturbance of the deposits will be kept to a minimum and what steps, including any further archaeological work, will be taken to mitigate disturbance of the deposits (a mitigation strategy).

A4. York City Council will normally expect that the agreed mitigation strategy will be the subject of a section 106 agreement.

A5. Proposals for archaeological excavation projects which do not form part of an agreed mitigation strategy must be the subject of a separate planning application. Permission will normally be refused where excavation proposals do not meet the following criteria:
   (A) that the research design of the excavation meets the requirements of the research agenda adopted as part of this policy;
   (B) that the project is adequately funded;
   (C) that the project will be carried out to the highest professional standard.

A6. York City Council will seek to promote the use of the archaeological resource as an educational and cultural resource for the people of York.

A7. York City Council will maintain and update an archaeological database for the city.

A8. York City Council will designate an Area of Archaeological Significance. Within the AAS policy A3 will be applied where development proposals meet one or more of the following criteria:
(A) where the development lies within 100m of the boundaries of the AAI;  
(B) where the development lies within 50m of significant elements in the known archaeological landscape;  
(C) where the development lies on an undeveloped site.

A9. York City Council will convene an archaeological forum for the city which will advise the council on the content, structure and objectives of the research framework.

A10. York City Council will construct and maintain a list of suitable qualified archaeological contractors, consultants and specialists who are competent and willing to work in York.

A11. York City Council will adopt or define statements of standards, best practice, and archive structure to enable it to maintain and enhance the standards of archaeological work in the city.

A12. York City Council would welcome the deposition of all finds and archives relating to an archaeological project as a gift with either the Yorkshire Museum or with another appropriate institution registered with the Museums and Art Galleries Commission and approved as an archaeological depository by English Heritage.

A13. Foundation designs will normally be expected to follow the guidelines summarized in this policy document and detailed in the Development and Archaeological Study.

Source: YCC (York City Council) 1992.
6.1 Role of Stakeholders

6.1.1 Creation of the policy

As a result of the problems that occurred in the late 1980s, which led to the adoption of PPG 16, English Heritage made funds available for local governments to hire in-house expertise to deal with archaeological matters. In York, the City Council hired John Oxley as Principal Archaeologist. His first order of business was to draft an archaeological policy for the City.

Once the policy was drafted and had gone through a series of internal discussions, which resulted in the planning committee authorizing a draft for public consultation, John Oxley identified groups that he believed would be willing and able to comment on the policy. He then sent a copy of the draft policy to approximately 75 organizations, both national and local, asking for their views on the document. These contacts included government departments, universities, heritage organizations, and private companies.

In addition, the City organized a seminar which was aimed specifically at engineers, architects and developers. These individuals were identified from their previous contacts with the planning department in York. Approximately 110 people attended the one day seminar which was designed to inform these individuals of the contents and mechanics of the policy, as well as to solicit their responses.

In terms of the general public, there was little effort made to engage this group in a dialogue regarding the policy. An advertisement was placed in the City Council newsletter, which is circulated once a month to every household in the city, notifying the public that a policy had been drafted concerning archaeology and was available at the planning department for their perusal. Further, a series of similar announcements were made on the local radio station. It is worthwhile to note that no written comments were received from members of the public regarding the policy.
Surprisingly, no public meetings were organized, nor were any opinion polls commissioned to gage the extent to which the public would support the particular approach outlined in the policy, or to see if they understood the policy, or if they were even interested in it. When questioned about the lack of public consultation the most common answer was that the policy was considered specialized, meaning the general public would have been unable to provide any useful input. John Oxley also suggested that the City Council did not want to spend the money on public consultation for "this sort of issue."

Given the fact that archaeological considerations are now part of local government responsibilities, it would be expected that consulting the public regarding these issues is an area where planners should be involved more actively. If this policy is to be respected and well integrated into the planning domain one would assume that public support would be important. It is ironic that one of the policy statements included in the document states that the "York City Council will seek to promote the use of the archaeological resource as an educational and cultural resource for the people of York (YCC, 1992: 8)." To date the City Council has done nothing to fulfil this objective (John Oxley interview).

This lack of integration of archaeological considerations within the larger sphere of planning responsibilities, such as public consultation, may be a result of the fact that it is a relatively new obligation, and it is simply experiencing "growing pains". The other possibility may be related to the fact that the decision to integrate the management of the archaeological resource within local planning, as well as the decision to place in-house expertise in local authorities, came from central government. This top-down process may have had the effect of alienating local planners. Whatever the reason, at present it appears that the planners in York hold the view that the greater responsibility for the sub-surface heritage is not their concern.
John Oxley did mention, however, that since the policy was drafted the City Council has set up neighbourhood forums where the public is able to discuss issues relating to their particular neighbourhood and comment on policy development across the city. He suggested that had this system been in place when the policy was drafted it would have been used to introduce the policy to the public.

The comments that were received from the groups that were consulted directly were then summarized and where appropriate, recommendations for modifications in light of the comments were suggested. Two significant changes that resulted from the comments, concerned the Area of Archaeological Importance and the ownership of finds. In terms of the former, the original draft document stipulated that evaluations and the 5% preservation goal only applied to an area designated as the Area of Archaeological Importance. However, as archaeological assets are ubiquitous in York, archaeologists felt that the policy left deposits outside this designation vulnerable. As a result, John Oxley devised an Area of Archaeological Significance contiguous to the Area of Archaeological Importance. Over the last four years, however, John Oxley has further modified these designations. He has effectively abandoned these differentiations and applies the process of evaluations and 5% preservation throughout the city. He indicated that this approach will be incorporated into the Local Plan which is currently being drafted.

In terms of the ownership of finds, the original document insisted that developers deposit any materials found on a site with the local museum. It was pointed out to the City, however, that in England all finds are the ownership of the property owner. This means that a developer could keep the objects, auction the objects off, or throw the objects into the rubbish pile, regardless of how important the objects may be for research purposes. Thus, the document was modified to read that the
"York City Council would welcome the deposition of all finds and archives relating to an archaeological project as a gift with either the Yorkshire museum or with another appropriate institution registered with the museums and art galleries commission and approved as an archaeological depository by English Heritage." (YCC: page 8)

To date there has been general compliance with this policy statement. However, in the period since the policy has been adopted there have been no "significant finds", so it is difficult to determine to what level this suggestion will be observed (John Oxley interview). It may be that the possibility of bad publicity will prove to be the only incentive required to ensure compliance with this request.

6.1.2 Ongoing Involvement

The only mechanism introduced which maintains the involvement of stakeholders in the ongoing implementation of the policy is an archaeological research forum. The policy states that "York City Council proposes to constitute and convene an advisory forum (YCC: page 19)." The purpose of the research forum is to subject the research framework, as discussed in chapter five, "to continual review and debate so that it reflects the results of recent work and changes in thinking (YCC: page 19)." The policy also states that "the proposed Forum and its constitution will be the subject of a separate report (YCC: page 19)." This report has yet to be written.

As the name suggests it is a forum made up of individuals from the archaeological community. There are representatives from the York Archaeological Trust, the Department of Archaeology at the University of York, the Council of British Archaeology, which has their national headquarters in York, the Royal Commission for Historic Monuments (England), which also has an office in York, the York Architectural and Yorkshire Archaeological Association, the Yorkshire museum, which is in
York, and John Oxley from the City of York. The forum is chaired by Mr. John Hampshire, Chairperson of the York Philosophical Society.

To date the research forum has only met once, and a second meeting had not been scheduled at the time the interviews were conducted. Unfortunately, the dynamics that currently prevail in York's archaeological community make the productive operation of a research forum difficult. To reiterate, before PPG 16 the York Archaeological Trust was solely responsible for archaeology in York. However, as a result of the present system which integrates the curation of the archaeological resource with the decision making process in local authorities, organizations like the York Archaeological Trust now have a peripheral role as consultants (see Chapter Three). Consequently, emotions ran high at the first meeting of the research council. The representatives of the York Archaeological Trust used the meeting to "get rid of some emotional baggage (Peter Addyman interview)." The view voiced by members of the Trust was "this is where we stand and we'll cooperate, but it (archaeological research) is something we have been doing perfectly well for 25 years (Peter Addyman interview)."

Further to these institutional tensions, it was suggested by a number of the individuals interviewed that there is also a "power struggle" being waged between the director of the York Archaeological Trust and the head of the Department of Archaeology at the University of York. Both are highly respected, charismatic individuals who are vying for the position as "first man of archaeology" in York. As a result of these complications, the archaeological community in York is fragmented, and it remains to be seen if the institutional and personal differences can be resolved.

Beyond this forum there are no other formal mechanisms for the involvement of other stakeholders. The obvious problem facing planners is in terms of the place of archaeology in the public interest. As will be discussed shortly, the "invisible" nature of archaeology means that there is
not a large public constituency outside the archaeological community. This lack of a public constituency means that it is difficult for planners to identify those individuals that would critical to consult with regarding the policy and its implementation. In these terms it is questionable as to whether planners should be obliged to concern themselves with helping to organize and build a public constituency for archaeology.

Cliff Curruthers, the Development Control Manager for the City of York, expanded upon this issue and suggested that most people do not respond to archaeological issues simply because they are unaware that it is a problem or an issue unless they have a specific or personal involvement in archaeology. Moreover, he believed that even when individuals are aware of archaeological issues they will only get involved if they are cognizant of particular archaeological issues of a specific site. He stated that it is very rare that anyone would raise archaeology as a concern, and therefore most of the City's consultation with local people is based upon what they can see in their immediate vicinity. Similarly, Mr. Curruthers explained that the private sector, including developers, architects and engineers, would be involved with the archaeological policy only if their particular proposal had archaeological implications.

6.2 Implementation of the Policy

6.2.1 Planners and the Policy

John Oxley as the City's Principal Archaeologist, is responsible for overseeing the mechanics of the City's archaeological policy. He decides the archaeological response to a planning application, he writes the specifications and he operates the archaeological database. Although John Oxley is the key person in the daily working of the policy, planners still have an important role to play in the policy's implementation.

The primary duties of planners are control and coordination. When a
developer approaches the planning department with a proposal for development, one of the four area planners is typically the first person they consult. After discussing the proposal with the developer, it is up to the planner to ensure that all the proper consultations with the appropriate departments and specialists are done and that no one is overlooked. In order to carry out this role effectively, it is imperative that planners are aware of all the material considerations that have to be taken into account when determining a particular application. Since archaeology is a material consideration, it is crucial that planners be familiar with the archaeological policy.

Whether it is in terms of urban design, access to a site and parking, or archaeological considerations, after the responses to a proposal have been made it is the planners who begin the process of negotiation in order to improve the scheme. This process of negotiation also includes arranging meetings between the developers and the particular people who have voiced concerns regarding the proposal. For example, if John Oxley has specific issues that the planner is unable to reach an agreement with the developer about, the planner will arrange a meeting between John Oxley and the developer.

The final role for planners in the process is to draw together the loose comments, and to identify what the issues are for a particular proposal. For example, planners will consider the appropriateness of a scheme, as well as what the proposal will look like, its scale, and its massing. At the end of the day planners are expected to make a balanced recommendation of the proposal's overall merits. This recommendation accompanies the proposal to the planning committee.

Beyond these roles, John Oxley stated that he relies heavily on planners to alert him when small scale proposals, particularly for sites outside the city centre, come into the department. He explained that if he
does not raise an issue the planners often assume that there is no archaeological suit to be included. For example, if an application for a change of use is submitted, without prior consultation with the department, then it simply appears on the planning applications list as a change of use proposal. John Oxley explained that this change of use might include taking out floors and putting in an elevator, which would have an impact on the sub-surface deposits. If his attention is elsewhere, however, he may not take notice of the change of use designation on the planning list. It is in these circumstances that he relies on the planners, who would know what the scheme entailed, to bring the information to his attention. He mentioned that only 2 of the 4 area planners are conscientious in these situations. This inevitably means that applications are being approved that do not take the necessary steps to mitigate the impact on the sub-surface remains, and as a result archaeological deposits are being destroyed.

This situation may be a manifestation of the fact that the policy has not been well integrated into the overall planning domain, and planners do not feel a sense of responsibility for the policy and its mandate. When asked about a resolution, John Oxley stated that he would like to see the City hire more archaeologists. While this would alleviate the problem, a more immediate, and perhaps more comprehensive, solution may be to better educate the planners regarding the importance of the city's archaeological heritage, and its inherent fragility. This would foster a higher regard for this cultural resource, and in turn would aid planners in communicating these ideas to the general public.

### 6.2.2 Inter-governmental Involvement

The only inter-governmental involvement with regards to archaeology comes from English Heritage. However, the statutory role of English Heritage in relation to the planning process is narrow. The three main
duties of English Heritage under the National Heritage Act are the following: the conservation of ancient monuments; the conservation and enhancement of conservation areas; and to increase the level of public awareness of ancient monuments and historic buildings. When these duties are translated across to the planning process, it is only obligatory to consult with English Heritage on a planning application that will affect a scheduled ancient monument (see Chapter Two) or the site of any scheduled ancient monument.

Beyond this statutory role, the involvement of English Heritage in local planning is supportive and advisory. In terms of the former, it is primarily through the consistent level of expenditure on posts, such as the position currently held by John Oxley, that they provide support to local planning authorities. Also by endorsing the policies that local authorities adopt, English Heritage lends credibility and influence to these initiatives.

In terms of its advisory role, John Oxley explained that if he comes across a situation that he does not have the experience to deal with, he would contact English Heritage to determine if anyone in the organization had handled a similar situation in the past. He also explained that if the City found itself in the situation where it appeared they may refuse an application on archaeological grounds, and that the decision may go to a public enquiry, he would notify English Heritage of the situation, and have them in agreement at the earliest possible stage. Thus, in the event that a decision did go to a public enquiry, English Heritage would support the City's point of view.

6.2.3 Politics and the Policy

As with most policy documents, there is a good deal of discretionary power written into the policy. For example, the policy is littered with phrases such as "will normally be expected" and "may be asked." Further,
the policy states

"the evaluation may indicate that the proposed basement would destroy a large amount of important deposits. In this situation, the proposal would be considered on its merits, weighing the importance of preserving archaeological deposits against all other material considerations." (YCC: page 35)

As a result of these kinds of statements, the individuals interviewed were asked if they are concerned about politics affecting the manner in which the policy is implemented.

Cliff Curruthers explained that if a development was going to destroy a significant amount of archaeology, but it was an important investment in the city and had the potential of generating a large number of jobs, or if the development was of a politically sensitive nature such as social housing, then politicians would naturally have to make a political decision. The concern is obviously that the archaeological heritage will always "lose" out to more tangible assets that can be easily translated into votes. He stated, however, that he feels the archaeological policy is robust enough to overcome most concerns, and that he would find it difficult to envisage a situation where deposits would be completely sacrificed for a development.

This view was generally held by most of the individuals. The three politicians interviewed, regardless of political orientation, all stated the they did not feel that what the policy expected was so onerous that political decisions would have to be made. Henry Owen John, the local inspector from English Heritage, stated that in all the time he has been dealing with York, the representatives on council have upheld the 5% maximum destruction limit. Therefore, he felt the City has implemented the policy very effectively. He did temper his opinion, however, with the comment that the policy will always be subject to external pressures.

The only concerns came predictably from the archaeologists. In general, most supported the above viewpoint, but qualified it based upon the trust they place in John Oxley. For example, Steve Roskams, an instructor
in the Department of Archaeology at the University of York, stated that he felt John Oxley is "very sharp, as well as being open," so everyone respects him and listens to his advice. The fear expressed was that the City Council could become "fed up" and easily install someone as a "puppet". Jane Grenville, an instructor in the Archaeological Heritage Management program at the University of York, believed that "if you have a rather supine person in that post (Principal Archaeologist) you could have problems."

Richard Morris, Director of the Council for British Archaeology, also expressed his concern regarding discretionary decision making in local government. His general concern was based upon information he had received from Rescue, an archaeological lobby group, describing cases in other authorities where politics was intruding in the way in which archaeological policies were being carried out. He suggested that it was the "invisibility" of sub-surface deposits that allowed politicians to "get away with archaeologically unfavourable decisions."

6.2.4 Monitoring and Updating

Monitoring the work undertaken in response to the policy is proving to be difficult with current staffing levels. To reiterate, the policy states that a developer is expected to provide the City with a mitigation strategy which sets out the operating methods on site. The purpose of this information is to ensure that archaeological deposits are not subject to unnecessary damage. As Peter Addyman explained, however, this is often not the case.

Dr. Addyman described a situation where the York Archaeological Trust was hired to conduct excavations of the sewage trenches on a site where the Roman legionary bathhouse is believed to be located. As required by the mitigation strategy for the site, the trenches were excavated and filled with crushed limestone to protect the remains. A few weeks later, however, Dr. Addyman returned to the site to find a large hole being dug on
part of the site where a hole had never been discussed. When he approached the workmen, they indicated that the sewers needed to be refit. As Dr. Addyman described the conversation, "they said they knew the sewer was done there somewhere and they were digging holes until they found it."

Dr. Addyman suggested that this kind of situation occurs frequently. He recounted a similar incident where an on-site problem occurred with the contractors work. Unfortunately John Oxley was unavailable, and there was no one else to deal with the situation. By the time John Oxley had returned the damaged had been done. Dr. Addyman suggested that what is required is more staff to monitor the on-site work. "If you are dependent on one person doing the follow through on maybe 10-15 developments during peak times, it is impossible to monitor them all (Peter Addyman interview)."

In terms of assessing and updating the policy, the only formal mechanism adopted has been the aforementioned research forum. As previously discussed, this forum has only met once, and its future is doubtful. It is difficult, therefore, to assess how effective the forum will be in ensuring that the City maintains a robust research agenda. All of the individuals interviewed that were familiar with the forum and its mandate, support the concept of the forum, and hope that it will be able to overcome the current difficulties that plague its operation.

Beyond the research forum, however, there are no other mechanisms for assessing and updating the City's policies. Bob Fletcher, Councillor and head of the City of York's current planning committee, explained that on occasion the City Council has commissioned across the board opinion polls. The purpose of these polls is to determine if citizens are satisfied with the policies currently being implemented by the City. However, Cliff Curruthers explained that these opinion polls are rare, and that it is generally through experience that a policy will be updated. He stated that by dealing with each proposal as it comes along, over time John Oxley will identify any particular
problems that are arising. This information will then be fed back into the policy making process at a later date.

6.3 Implications of the Policy

6.3.1 Development

The most significant implications of the policy for development are the costs that developers must absorb for evaluations, watching briefs, and any other archaeological work deemed necessary, as well as the engineering requirements. The individuals interviewed from the private sector all agreed that the costs for the necessary documentation is worth the "piece of mind" they provide. Archaeological considerations are now viewed as "just one more thing to contend with" (Nigel Perry interview). This means that the costs can be factored in at the beginning of a proposal, rather than having a situation where sub-surface deposits are not considered during the planning stage and occur later in the development process which can cause lengthy delays and significant financial costs.

Two situations were identified, however, that illustrated the negative effects that these new costs can have for development. John Edmonds, an architect, described a situation that occurred shortly after the policy was adopted. One of his clients was considering selling his property but wanted to have it rezoned office or residential to increase the value prior to listing. An archaeological evaluation was required, but at that time the lowest bid for the archaeological work was in excess of ten thousand pounds. Moreover, the required archaeological work would have caused a significant disruption in the daily operation of his client's business. Consequently, the land has not yet been sold. Mr. Edmonds indicated that he and his client annually review the costs for the archaeological evaluation and each year the costs have decreased. At present the work is estimated at approximately five thousand pounds, and Mr. Edmonds is confident that the site eventually will be
Another example cited where the costs of the documentation had a negative impact on a development proposal, was on a large site with a high potential for significant archaeological deposits. The estimates that were received for the archaeological evaluation alone were in excess of one hundred thousand pounds. Without the insurance that planning permission would be given, the developer felt that the costs were too great and withdrew the application for development (Nigel Perry interview).

The individuals interviewed from the City were asked if this negative impact on development was a concern, and if there had been any studies undertaken to investigate the issue further. The general opinion was that such studies would be of little use, since the "whole purpose behind PPG 16 was to ensure that development was not impeded by archaeological considerations (Cliff Curruthers interview)." Thus, the opinion was that these few casualties of the policy were very much the exception rather than the rule, and that the policy was facilitating development rather than deterring it.

Some of the archaeologists voiced the opinion that the only reason there have been no challenges from the development community is that the stakes to date have not been substantial enough. David Brinklow, an archaeologist and Chairperson of the York Architectural and Yorkshire Archaeological Society, stated that some developers have expressed the opinion that they should not have to pay for any archaeological work and believe that they could successfully challenge the policy in court. He hypothesized that if a riverside site came up for development and the proposal included double basements, the costs for the archaeological work would be such that the developer may decide that it is worth the time and money to challenge the policy. He proposed this scenario based upon the fact, that at this point in time developers are expected to pay for a rescue
excavation if their development cannot conform to the 5% destruction maximum. Thus, in this hypothetical case the costs for such an excavation would be considerable. It is worthwhile to mention that although at this time there is no provision for financial compensation, if a situation such as the one proposed above were to occur, it is not unreasonable to suggest that English Heritage may be willing to contribute to the costs of the excavation in order to avoid litigation.

In terms of the engineering requirements, again those interviewed from the private sector had few difficulties with this aspect of the policy. From a engineering point of view piling is accepted as a technically sound alternative, it is simply more expensive. The overall opinion, however, was that even though piling a site is a more expensive option, as long as it is a requirement that is known and understood at the onset of a proposal it is a cost that can be factored into the budget.

Overall, the representatives interviewed from the private sector indicated that costs related to archaeological considerations have to be weighed against the fact that York is "a nice place to be (John Edmonds interview)." They all felt that one of the reasons most people would prefer to live and work in York, rather than in other towns, is the historic fabric of the city. Therefore, the "odd costs" that have to be factored in for archaeological considerations are reasonable when balance against the fact that history does have a comparative advantage.

6.3.2 Archaeology

The first archaeological implication of the policy, is its wholesale acceptance of piling as an appropriate engineering solution for the preservation of the sub-surface resource. On one level, the argument against piling is based upon the fact that in order to answer certain archaeological questions the deposits need to be completely coherent, and therefore any
destruction from piling is unacceptable (Steve Roskams interview). On another level, the concern focuses on the impact that piling has on a site. Many in the archaeological community are skeptical about piling, particularly the piling of deeply stratified waterlogged sites. They often site Norwegian practice which regards piling as inherently destructive. A statement from the Norwegian State Antiquary's office states:

"Piling is considered a bad thing for archaeological sites. The present position in Norway is, that if a contractor wants to pile an archaeological site, we demand a total excavation. The reason for this is the following:

-the piles tend to bend down the layers as they are hammered down through the layers

-by hammering down the piles oxygen is brought into the layers which had previously been oxygen-free. This oxygen starts the process of breaking down the layers

-the piles puncture the layers and the water drains away, thus starting the deterioration.

We do not therefore consider cultural layers on piled sites preserved. This is based on experience. Some years ago in Bergen we excavated a site after it had been piled. Even though the excavation was only some months after the piling, we could see the "air pockets" in the layers and the deterioration caused by this. We could also see very clearly the layers being bent down. In this case we allowed the piling because we intended to excavate the site in any case and because we wanted to see how piling affected the cultural layers (Biddle: page 8)."

Dry sites can also be damaged by piling. One case in Worcester has documented the damage a dry site can suffer when piled.

"... the distortion cause by the piles driven through the archaeological deposits was observed, the distortion being up to 0.30m on either side of the pile and over 0.30m vertically. During post-excavation analysis medieval and post-medieval pottery was identified from deposits dated to the Roman period and sealed beneath a thick layer of post-Roman soil. It is probable that the piling operation transported this post-Roman material into earlier deposits....The stratigraphy showed that apart from the area of the pile itself a further area adjacent to the pile was disturbed (Biddle: page 13)."
As a result of such information, an attempt has been made by the City of York to gather more information regarding the effects of piling sites. On one site in the centre of York, instruments have been incorporated into the foundation which will record data on acidity levels and changes in hydrology. It will be a number of years, however, before enough data has been gathered to produce a definitive answer on the effects of piling on York's archaeological layers, and yet piling is used unreservedly throughout the city.

A second and perhaps more obvious implication of the policy, is its effect on archaeological excavations. As long as developers can adhere to the 5% destruction maximum there is no need for archaeological excavations to take place. As aforementioned, excavations are critical as context is the key to the advancement of understanding through the practice of archaeology. The only excavations that are taking place at the present are along sewage trenches, and other invasive structures.

Although most of the individuals interviewed would not want to return to the pre-PPG 16 years when rescue archaeology was rampant and indiscriminate, they all agreed that the pendulum has swung too far in the opposite direction. As Jane Grenville stated "in my view now we've got too little excavation and I'm not prepared to hold with the view that we should not be excavating at all." Peter Addyman added "now ....we develop a mitigation strategy to design a building that won't destroy the archaeology which means that we have a wonderful legacy for posterity but we no longer have the opportunities that came from salvage and rescue archaeology to extend the existing base of knowledge."

The major contention is that without excavations research is brought to a complete halt. Some of the individuals interviewed felt that archaeologists should not be too "precious" about excavations, and that a great deal of archaeological information can be gleaned from the evaluation
process (Henry Owen John interview). Further, it was suggested that there are other techniques that archaeologists could employ to carry out research. Such techniques include ground probing radar, aerial photography, magnetometry, and resistivity. When asked about these techniques the archaeologists interviewed unequivocally answered that none can be used effectively in an urban context. For example, radar has been employed on a few sites in York, but because the deposits are so deep and so complex, most of the information recorded is nothing more than "echoes and reflections (David Brinklow interview)." Similarly, aerial photography, which is extremely helpful on rural sites, requires the deposits to be shallow in order for them to be recorded on film. Thus, although most of the archaeologists agreed that cumulatively evaluations will provide useful information, all believe that excavations, even on a limited basis, remain critical if knowledge is to continue to advance.

Some of the archaeologists are optimistic that with the inclusion of the research agenda in York's archaeological policy, research excavations will at some point take place. Most, however, agreed with the opinion expressed by Peter Addyman who explained, "in my experience developers aren't really interested in archaeology. They may take a passing interest but their main objective is to develop a site and make a profit.....so nowadays they will do the basic amount of archaeology that is required. I have yet to meet a developer who wants to do a major research excavation."

To reiterate, the policy reads "if the evaluation indicates that the site has the potential to meet the criteria contained in the Research Framework, York City Council will advise the developers that they have the option of offering the site to the archaeological community..." (YCC: page 38). Thus, the decision to undertake a research excavation is left to the discretion of the developer. As Cliff Curruthers explained, the City Council could not insist on a research excavation taking place because in planning terms
"we're are looking at things that are material to the proposal....we can only deal with issues that physically appear on the ground....we can suggest they consider an excavation but we could not refuse an application on those grounds." The central problem concerns the legal concept of "reasonableness." The underlying presumption of the British planning system is that development should be allowed to proceed with little interference (Jane Grenville interview). Therefore, if a local authority refused an application on the grounds of a research excavation, it is likely that a court would find these terms unreasonable, and overturn the decision.

An example of the improbability of a research excavation willingly being undertaken by a developer was demonstrated by a site located on St. Andrewgate site in York. The site is situated in zone two of the research agenda and meets the necessary criteria for a research excavation (see Chapter Five). Moreover, the developers of the site, Sheppard Homes, are from York and are described as being "as conscious as anybody could be of the heritage of their city (Peter Addyman interview)." Dr. Martin Carver, professor of Archaeology at the University of York, approached the managing director, Peter Sheppard, and presented him with a proposal to excavate the site that included a plan for funding the excavation from a consortium of sources. Peter Sheppard agreed to the proposal, even to the extent of suggesting that Sheppard's would build a viewing grandstand. Moreover, there was to be no time constraints as Sheppard's was in no hurry to build on the site. Problems arose, however, when Sheppard's approached the City for planning gain, in the form of higher density on the site, in exchange for allowing the research excavation to take place. The City refused to bargain archaeology for higher density, and Sheppard's withdrew their consent for an excavation to take place. Thus, as this example illustrates, there is "no muscle" supporting the research excavation provision of the policy, and
unless a developer with a keen interest in archaeology is involved, it would appear unlikely that a research excavation will be undertaken.

In all fairness, it is not only developers that would have a difficult time justifying an archaeological excavation. To reiterate, local authorities, while wishing to provide cultural leadership, also want the economic benefits that derive from development such as employment opportunities, and an increased tax base. These issues are particularly salient given the current economic position of York. As will be discussed in the following section, York in the last 5 years has lost many jobs due to plant shut-downs, and technological dislocation. Therefore, one reason the policy has "no muscle" to support excavations is because the City of York does not want to be viewed as impeding development.

All of the archaeologists interviewed expressed a concern about the negative impact that the cessation of excavations will have on public support for archaeology. Most believe that one of the results of the policy is to make archaeology increasingly more technical, and therefore more uninteresting to a lay audience. As Richard Morris stated, "there is nothing more magnetic than a hole in the ground." All the archaeologists recounted examples of people approaching a site during an excavation and being very keen to ask questions, and see the archaeologists in action. Further, without excavations it will be virtually impossible to include amateur enthusiasts in the archaeological experience.

The most obvious long-term ramification of losing public support, is the impact that this loss would have on overall government support. Without a constituency to appeal to, the archaeological community will find it difficult to lobby the government for changes in legislation or increased funding. As Richard Morris explained it is important "to have large well informed public with a sense of enthusiasm....that would make everything so much easier...public funding, government support, everything else would
6.3.3 Economic-Tourism

In the last fifteen years archaeology has played a significant role in the tourism industry in York. In this sense the so-called "heritage industry" has been beneficial for the promotion of archaeology. As there is an attempt to capitalize on England's history and heritage, innovative initiatives that incorporate archaeological remains into attractions are finding increasing support.

An example of the significant role that archaeology has played in the economy in York is the Jorvik Viking Centre. In the early 1980s the York Archaeological Trust with the help of a local entrepreneur successfully put in a bid to incorporate a museum within a development that was slated to be built over a major Viking Age excavation that had taken place in the centre of York. An independent consulting group has calculated that the Jorvik Viking Centre has over 650,000 visitors a year and generates twenty million pounds worth of business in York every year (Peter Addyman interview). On any given day during tourist season the wait in the queue for the Jorvik Viking Centre can exceed 2 hours.

Until recently, however, tourism was viewed by the citizens of York, and therefore the City Council, as a necessary evil, something to be managed but not encouraged. Now in the wake of findings from a recent tourism report commissioned by the City Council, council members and citizens are seeing this industry in a more favourable light.

The traditional economic base of York is manufacturing and industry. In the last 5 years, however, thousands of jobs in these sectors have been lost due to plant closures and technological dislocation. York for the first time is dealing with large scale unemployment, which means that councillors and citizens alike are beginning to appreciate the 10,500 jobs
and 257 million pounds that are generated in York by the tourist industry (Tourism Strategy Group 1995: page 3). As a result of this new outlook the City Council has set up the York Tourism Strategy Group. The mandate of this group is to try and find ways to consolidate and promote the traditional interests of York. Since most visitors come to York to experience and explore the city's history, the Tourism Strategy Group is attempting the find new opportunities within this framework.

Peter Addyman, one of the members of the Tourism Strategy Group, indicated that archaeology is one area that has been under exploited. John Oxley agreed that it is within this context that a large archaeological excavation could take place, particularly if it was allied to a large scale development in the city centre, similar to the Coppergate excavation that spawned the Jorvik Viking Centre. It is worthwhile to stress that the information in this section was derived solely from the interviews for this thesis, and therefore at the present time there are no existing linkages for the possible spinoffs derived from archaeology.

It is hoped, however, that the Tourism Strategy Group will be given funds to undertake a detailed study on the relationship between archaeology and tourism in York. As Peter Addyman stated, the "Vikings were only a short period in York's history... there is 1750 years of history to play with. It just requires an imaginative approach to develop another icon for the city and archaeology could be that icon."

6.4 Reactions to the Policy

6.4.1 Government and Archaeology

All the individuals interviewed were asked if they believe that local government is the authority best able to manage the archeological heritage. All the respondents felt that local government is the best place to deal with archaeological considerations, since it is at the local level that decisions are
made which directly impact on the cultural layers. Bob Fletcher, however, did express a concern that with the devolution of decision making to the local level there is a responsibility for local authorities to act in a constructive and sensible manner with regards to their new area of power, and he was not confident that this is the case in all jurisdictions.

Although everyone agreed that local government is able to conserve the archaeological heritage, they all envisage a guiding role for central government in establishing and funding a national research agenda. David Brinklow stated that central government is the only actor that has enough money to support projects that have academic meaning. John Oxley added that he believes that research archaeology has to be paid for by the state. He felt that a landowner could not be asked legitimately to bear the costs involved in delays in the name of research simply because that individual happens to own a site with important archaeological deposits. He further stated that, "if we as a society are interested in archaeology then we as a society collectively have to bear the costs of undertaking whatever work is considered necessary." Peter Addyman suggested that the country should establish a fund which would be administered by an archaeological research council. Then based upon regional and local research agendas, which would be referenced against a national agenda, archaeologists could make bids to the research council for funding. This funding could potentially include purchasing sites before they were developed, and then selling them after the excavations took place; thus, avoiding any time constraints based upon development agendas. Although initiatives such as these would require national leadership, in order for such programs and funding to be feasible, it is imperative that the archaeological community cultivate a well educated and enthusiastic public constituency.
6.4.2 Importance of the Policy

Everyone generally agreed that having a local policy and management framework is important. Some indicated, however, that in authorities where similar policy frameworks do not exist, essentially the same process occurs as the local planners simply apply the guidance laid out in PPG 16. Although this means that sub-surface deposits may be treated the same in the end, those individuals interviewed from the private sector expressed a preference for working with a more detailed policy like the one adopted in York. Mr. Parkinson, Managing Director of Wainhomes Ltd., explained that it makes the planning process much more efficient when a local authority has adopted a detailed framework. He pointed out that after an evaluation has indicated a site has significant archaeological deposits, some authorities do not know how they wish to approach development on the site. He said that he will often take the York policy to other authorities in order to make the decision making process more efficient.

Richard Morris stated that he felt policy frameworks such a York's should not be underestimated. He explained that the effectiveness of archaeology and development in the planning system relies on the greater detail provided in local policies. In fact, the Council for British Archaeology spends a considerable amount of time reviewing local plans and policies, and providing local authorities with advice. "These documents are the pivots around which everything depends (Richard Morris interview)." Further, Richard Morris stated that in his view the weakness of the planning system is the "perversity" of elected members; therefore, local policies act like insurance policies by providing frameworks within which elected members are encourage to think and conduct themselves.

In general, everyone interviewed was content with the policy. The archaeologists would obviously like to see the concomitant research agenda strengthened, but realize that the powers currently devolved to local
government do not supply them with the necessary authority. As John Oxley, the author of the policy, stated

"there are a lot of new developments taking place around the city, and I can sleep at night because I am happy that we are doing what we say we are going to on the majority of the sites; that is, we are preserving the deposits. The main problem is how do you move to the next stage because preservation is not an end in itself."
CHAPTER SEVEN

CONCLUSION AND RECOMMENDATIONS

7.1 "Conservation Policies for York: Archaeology"

In conclusion, Conservation Policies for York: Archaeology is neither revolutionary nor unique. The City Council of York has simply fulfilled its obligation as required by the current planning policy guidance, and has followed the advice set out in this guidance. The policy is, however, clearly written, and well formulated. The underlying aims and objectives of the policy are clear and reasonable, and the City Council has incorporated mechanisms to implement the policy's intended initiatives. Moreover, the policy appears at present to be working to everyone's general satisfaction. In particular, those who rely on the document, namely bureaucrats, politicians, and members of the development community, find the policy and its framework straightforward and efficient.

In terms of archaeology the policy is lacking. However, the document does what it is able to do given the current legislative basis for archaeology in England. In the wake of the rescue archaeology era in England, the prevailing position is preservation in situ, and the policy is in accord with this viewpoint. As John Oxley stated, however, preservation is not an end in itself. Consequently, he and the City Council should be acknowledged for attempting to move beyond simple preservation by including a research agenda in the document. It is hoped that by exposing developers to the concept of archaeological research, at some point in the near future a collaborative project may be undertaken that will include a research excavation within the context of a large scale development.
7.2 Planning Implications

Although the archaeological policy has been incorporated into the planning system in York to the degree that most of the aims and objectives of the policy are being met, the policy still appears to be operating outside the overall planning domain. Beyond the need to take the archaeological policy into consideration when assessing planning applications, the research suggests that the planners in York do not carry out any other planning responsibilities that would normally be expected in order to comprehensively integrate a policy into the sphere of local government planning. They seem to defer the majority of the responsibility for the operation of the policy to John Oxley, the City's Principal Archaeologist. It was suggested that this lack of involvement by the planners in York may be attributed to the relative "newness" of the policy, or perhaps that the planners maintain the opinion that the management of the archaeology heritage, including public consultation and analysis, is the responsibility of the in-house "expert".

The overwhelming impression was that the policy is not considered "York's" policy. With the exception of John Oxley, who sees this document as only the first step, everyone else connected with the City felt that they had accomplished what the central government and English Heritage had expected them to do, and there was nothing else to be done. There was no mention of undertaking studies regarding the impact of the policy, reassessing the policy at a later date, or of taking the policy to the public. Thus, it would appear that on some levels this policy is not considered to be the City's responsibility.

7.3 Broader Implications

All of the participants interviewed for the research agreed that while the policy that has been developed in York is very good, it should not be
used as a model for other authorities. Everyone held the opinion that what is being done in York is very appropriate to York, but that it would be a mistake to apply it elsewhere. This is because every authority has different needs to take into consideration, as well as different archaeological resources. It was believed, however, that all planning authorities in the United Kingdom should go through the process of developing a policy and management framework that allows that local planning authority to deal with archaeological matters effectively and efficiently. As John Oxley stated, "once you accepted that you are going to do something about a particular subject and you see a problem, you need to have a framework to allow you to achieve whatever it is you want to achieve."

This advice, to develop effective and efficient policies and management frameworks for dealing with archaeological considerations, can and should be applied beyond the shores of England and the United Kingdom. The fact that this recommendation applies to most "Old World" cities is obvious. However, "New World" cities should not neglect the possibility that others have settled the area previously, and should therefore strive to protect any surviving cultural material.

7.4 Further Research

7.4.1 York

It would be extremely valuable to revisit York in 5 years and reassess the policy at that time. This will be particularly interesting as York and its immediate environs are being amalgamated into a unitary authority. This process has the implication that the archaeological policy, as well as other policies for York, may have to be rewritten in the face of this change. At the time that the research was done, none of the participants were able or willing to articulate the implications the new unitary structure would have on the policy.
In addition, it would be interesting to revisit the policy after the next general election, in particular if a Labour majority was to gain power. Many of the archaeologists interviewed expressed the hope that a Labour government would be more inclined to pass new archaeological legislation including amendments to the current Treasure Trove law. Thus, it would be of interest to reassess the policy in York in light of any new general legislation.

7.4.2 Elsewhere

Another potential area for research would be a comparative study of other archaeological policies in England and abroad. It would be interesting to assess the policy in York and its implementation in relation to other local planning authorities. In particular, it would be of interest to see if other planning departments have had more success integrating their archaeological policies into the general planning system, and involving their planners in all relevant areas of their implementation.

7.5 Recommendations

The following recommendations, for both the local and national level, encompass initiatives that are intended to strengthen and advance the current position of archaeology. These recommendations are based upon the premise that archaeology is considered to be an important and worthwhile pursuit.

1) Increased staffing levels: At the local level more staff is required to monitor the implementation of Conservation Policies for York: Archaeology. The fact that the archaeological record is currently being destroyed through both oversight in planning process, and on site working practices by contractors, should be considered intolerable if the City
Council is truly committed to preserving the cultural layers.

2) **Planners and the policy:** As mentioned throughout the case study it is important to enhance the role that planners play in relation to the policy. The first step may be to better educate planners about the importance of the policy and its mandate in order to foster a sense of commitment to the policy. This initiative would provide planners with a fuller understanding regarding archaeological issues, which in turn enable them to communicate this information to the public.

3) **More soil studies:** At the local level more sites need to utilize the technology for recording acidity and hydrology changes in the sub-surface deposits. Again, if the City Council is truly committed to preserving archaeology they must support this research by insisting that developers include this technology in their foundation structures. Further, it is reasonable to expect the City Council to help fund these experiments in conjunction with other sources, such as English Heritage, the University of York and perhaps the York Archaeological Trust, as well as other national archaeological organizations.

4) **Resolving current conflicts:** In order to advance archaeological programs in York, and to ensure that the research agenda in the City's archaeological policy is maintained, it is imperative that the archaeological community resolve the current institutional and personality difficulties.

5) **Increase public support:** At the local and national level, the archaeological community needs to cultivate a well informed and enthusiastic public constituency. To reiterate, without public support government funding and legislative changes will not be forthcoming.
6) **New legislation:** At the national level, legislation must be adopted to secure the position of archaeology. The current position of the archaeological resource is not satisfactory. If it is agreed that the advancement of knowledge is the desired goal, then preservation is not enough.

7) **New funding strategies:** The central government must change the current funding system. First, more financial resources must be made available to the archaeological community; and second, as Peter Addyman suggested, an archaeological research council should be convened to formulate a national research strategy, and to administer funding practices.
BIBLIOGRAPHY


APPENDIX A

QUESTIONNAIRE

1. What are the specific problems that arise from urban archaeology (development conflicts, traffic control, pedestrian access, noise and other externalities)?

2. How was archaeology done in York in the 1960s, 1970s, 1980s, 1990s?

3. What were the issues involved in developing the current policy in York? Specifically what went wrong with the Queen's Hotel site?

4. Do you believe that having a planning framework like the one outlined in the policy document is important? Why?

5. What are the specific roles for planners in the implementation of the policy? (issue identification, consultation, preparation of technical reports, liaison among agencies and stakeholders)

6. Who are the key stakeholders in relation to the archaeological policy? When the document was created was there sufficient consultation with all the stakeholders? Do you feel there are sufficient links with the key stakeholders, and that they are involved adequately on an ongoing basis in the process?

7. What was the scope of public involvement in the creation of this document, and in ongoing consultation?

8. Did local heritage bodies have a role to play in developing the policy?

9. What was the structure of inter-governmental involvement in the development of the policy? Is there any ongoing involvement?

10. What arrangements have been made for policy monitoring, evaluating and updating?
11. The current policy seems to be a serious compromise between development and archaeology, and seems to affect how both will be undertaken in the future. Do you feel this is an acceptable compromise?

12. Preservation not excavation is central to this document. Patrick Ottaway states that area excavation is much more useful for studying the interrelationship of buildings, streets, yards and so forth, and that this approach is much more rewarding. The current policy framework, however, changes the nature of archaeological excavation in York from one of large scale excavation to one of limited evaluation excavations. How will this affect archaeology in the future? What will the nature of the "finds" be like? What are the consequences of the changes likely to be? How will this affect public support and tourism?

13. It is believed that the new more selective approach to excavation will demand more theoretical approaches such as remote sensing. However, some experts believe that methods such as remote sensing are of little value on urban sites because of the difficulty of coping with the great depth of superimposed strata, and are better suited to rural sites. Do you agree? If so, then what does this mean for urban archaeology?

14. In section 7.0 of the policy it sets out the framework for development on archaeological sensitive sites by the use of piles. In the Council for British Archaeology's Erosion of History piles are said to be more destructive than is generally thought. This report stated that the upper 3 feet of a site will often be disturbed by service trenches and linear excavations for pile caps and foundation beams. Therefore, sites on which buildings are to be constructed on pile foundations will be seriously damaged from an archaeological point of view. Is this a valid statement? If so, what are the alternatives? How has this concern been addressed in York?

15. The onus to foot the costs of archaeological evaluations and excavations have fallen increasingly on the shoulders of developers. How has this been received by the development community? What have the impacts been?

16. While the document is comprehensive, there is a great deal of discretionary decision making written into it. Is this a problem? Does
politics affect the process?

17. In his book Patrick Ottaway states that the prevailing opinion in central government is that local planning arrangements are sufficient to safeguard the interests of archaeology. Do you agree with this statement? What role do you envision for central government in the protection of the country's archaeological heritage?

18. Does the policy and its process work? If not, what is the nature of the operational problems? What could/should be changed?

19. What lessons can be applied from the York experience to other jurisdictions?

20. Do you see archaeology as being critical to the economy of York over the last 25 years? Is archaeology part of the economic prerogatives of the York City Council?
APPENDIX B

LIST OF INDIVIDUALS INTERVIEWED
(listed alphabetically)

**Dr. Peter Addyman**-Director of the York Archaeological Trust.

**Ken Beaven**-Councillor, York City Council (Conservative party); member of the current Planning Committee.

**David Brinklow**- Chairperson for the York Architectural and Yorkshire Archaeological Society; archaeologist with the York Archaeological Trust

**Dr. Martin Carver**-Professor of Archaeology, University of York.

**Cliff Curruthers**-Development Control Manager, City of York.

**John Edmonds**-architect with the firm Crease, Edmonds, Strickland.

**Bob Fletcher**- Councillor, York City Council (Labour party); Chairperson of the current Planning Committee.

**Jane Grenville**-Instructor in the graduate program in Heritage Management, University of York.

**John Hampshire**-Chairperson York Archaeological Forum; member of the Yorkshire Philosophical Society.

**Dr. Richard Morris**-Director of the Council for British Archaeology.

**Henry Owen-John**-English Heritage inspector for York region.

**Mr. Parkinson**-Managing Director of Wainhomes Ltd.

**Nigel Perry**-planning consultant with planning firm Nathaniel Litchfield.
John Oxley—Principal Archaeologist, City of York.

Dr. Julian Richards—Instructor in the Department of Archaeology, University of York.

Steve Roskams—Instructor in the Department of Archaeology, University of York.

Ian Tempest—York Enterprise Centre.

David Wilde—Councillor, York City Council (Labour party); member of current Planning Committee; past Mayor of the City of York.
APPENDIX C

CITY OF YORK
ARCHAEOLOGICAL SPECIFICATION

SCOTTISH HERITABLE TRUST SITE, SKELDERGATE
ARCHAEOLOGICAL EVALUATION SPECIFICATION

CONTENTS

1 Introduction
2 Site Description
3 Summary Archaeological Description
4 Summary of Previous Archaeological Work
5 The Deposit Model
6 Evaluation Programme
7 Summary

Appendix 1
Standard Scope of Work

Appendix 2
Amendment to Archaeological Evaluation Specification

Directorate of Development Services
Planning and Building Control Group
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July 1990
1.0 INTRODUCTION

1.1 The Scottish Heritable Trust site is a very important waterfront site in the centre of York. This document sets out details of the archaeological evaluation work that York City Council considers necessary.

1.2 The results of this archaeological evaluation will be used to determine what mitigation strategy will be necessary for any future development of this site.

2.0 SITE DESCRIPTION

2.1 The site lies on the south-west bank of the Ouse close to the Ouse Bridge. The site is bounded on the west by Skeldergate, on the north by Queens Staith Road, on the East by Queens Staith and the River Ouse, and on the south by buildings.

2.2 The site is currently occupied by a single building on the north-west corner of the site. The majority of the site is vacant.

3.0 SUMMARY ARCHAEOLOGICAL DESCRIPTION

3.1 The site lies within the Roman *colonia*. It probably includes within its boundaries part of the Roman riverfront and its associated structures. However, the exact position of the Roman waterfront is not known.

3.2 At some point during the post-Roman period, but before the tenth century, the main crossing-point over the Ouse had shifted from the Toft Green/Tanner Row alignment to the present site of the Ouse Bridge. The date of the shift is not known.

3.3 By the ninth century the Ouse Bridge crossing had probably, therefore, been established. As has been stated for the Roman riverfront (3.1 above), it is not known where exactly the Anglian and Anglo-Scandinavian river frontage was located.

3.4 In the medieval period Skeldergate was an important riverside street.
In the late thirteenth century Skeldergate was after Micklegate the most important street on the south-west bank of the Ouse. This site will, therefore, contain significant evidence of medieval commercial activities and reclamation work.

3.5 It would appear that by the fourteenth century the commercial importance of the south-west bank of the Ouse had begun to fade.

3.6 In the post-medieval period, Queens Staith was constructed and subsequently extended and enlarged. This activity points to the commercial importance of this part of the river frontage this period.

4.0 SUMMARY OF PREVIOUS WORK

4.1 Trial investigations have been undertaken on the Queens Staith site on the north side of Queens Staith Road. The trial holes and boreholes indicate the presence of extensive archaeological deposits dating from the post-medieval period back to at least the Anglo-Scandinavian period. They begin at between 8.5m OD and 6.6m OD and extend down to between 2.5m OD and -3m OD. The latter reading might have come from a borehole through a deep archaeological feature such as a pit or a well.

4.2 Excavations have been undertaken at the Queens Hotel site (1-9 Micklegate, YAT 1988/9.17 site archive), at Albion Wharf (23-28 Skeldergate YAT 1989.1), and at 58-9 Skeldergate (YAT 1973-75.14 see also AY 4/1.1-29; AY 8/1.37-52).

4.2.1 At the Queens Hotel site, where work was not extensive, excavations revealed a complex stratigraphic sequence. This included well preserved Anglo-Scandinavian organic deposits and the massive walls of a major Roman building. The sequence comprised at least 8m of stratified material.

4.2.2 At Albion Wharf a deep, 3m square shaft was excavated which located a medieval river-wall, Anglo-Scandinavian, Anglian, and Roman deposits extending to a height of 1m OD.

4.2.3 At 58-9 Skeldergate excavation of a large open area produced evidence
for medieval occupation, four pre-conquest timber buildings, and extensive Roman deposits including series of road surfaces and a deep, timber-lined well. This amounted to a stratigraphic sequence some 4m in depth.

5.0 THE DEPOSIT MODEL

5.1 The site occupies a significant location with regard to the development of the river regime, the river frontage, river crossing, and the post-Roman street system. There is also the probability that a well-preserved sequence of archaeological deposits with waterlogged preservation exists on the site. The site, therefore, offers the potential to explore both the spatial and sequential development of this area.

5.2 The general model gives ground sloping downwards south-west to north-east with the following levels (mOD):

<table>
<thead>
<tr>
<th>Level</th>
<th>Depth</th>
</tr>
</thead>
<tbody>
<tr>
<td>Modern</td>
<td>9.3</td>
</tr>
<tr>
<td>Medieval</td>
<td>8.1</td>
</tr>
<tr>
<td>Anglo-Scandinavian</td>
<td>9.0-6.0</td>
</tr>
<tr>
<td>Roman</td>
<td>9.0-6.0</td>
</tr>
<tr>
<td>Natural</td>
<td>9.0-6.0</td>
</tr>
</tbody>
</table>

5.3 The broad prediction is one metre of post-medieval deposits over two metres of medieval deposits (including waterfront deposits) over 3 or more metres of Roman deposits.

6.0 EVALUATION PROGRAMME

6.1 The following details need to be established:

6.1.1 the natural profile from Skeldergate to Queens Staith;

6.1.2 the total depth of deposit along this profile;

6.1.3 the depth of anoxically preserved, wet, and dry deposits along this profile;
6.1.4 an assessment of the quality and preservation of those deposits;

6.1.5 the foundation and cellar penetration by existing or previous buildings;

6.1.6 a deposit prediction for the entire site;

6.1.7 the development of the site as can be established from a survey of printed historical sources and maps;

6.2 The exact details of the implementation of the evaluation programme on-site should be the subject of discussion between the client, York City Council, the archaeological contractor. However, it is suggested that the on-site evaluation should consist of the following items:

6.3.1 an analysis of existing geotechnical information relating to this area;

6.3.2 a borehole survey of the site;

6.3.3 excavation of a series of 3m by 3m trenches across the site as indicated on the accompanying plan; excavation through medieval deposits should continue only in those trenches so indicated on the plan to determine the nature of any underlying deposits.

6.4 The following methodologies must be used:

6.4.1 All operations should wherever possible be non-destructive.

6.4.2 Where the examination of trenches is necessary:

6.4.3 all appropriate records must be made and kept;

6.4.4 all archaeological deposits must be sampled;

6.4.5 all records must be indexed, ordered, quantified, and checked for consistency;

6.4.6 all artifacts and ecofacts recovered and retained from the evaluation
must be packed and stored in the appropriate materials and conditions to ensure that no deterioration takes place and that all their associated record are complete;

6.4.7 in addition to this basic work to complete the records to Level 2, the environmental samples must be processed and assessed;

6.4.8 the rest of the material archive must be assessed;

6.4.9 and the stratigraphic sequence assessed.

6.5 The details and process outlined above will produce the following output as a concise report;

6.5.1 plan of site showing positions of trench and previous boreholes;

6.5.2 portfolio of drawn sections and trench plans;

6.5.3 interpretation of the structural sequence;

6.5.4 interpretation of the archaeological and research potential of the remainder of the site.

6.6 All the original material and paper archive must be prepared for deposition with the Yorkshire Museum. This will ensure that if the main project fails to occur, the archive for the evaluation will be complete. Copies of the report must be deposited with York City Council no later than six weeks after the end of the work on site.

7.0 SUMMARY

7.1 This document sets out the background to and outlines a programme for the archaeological evaluation which York City Council considers is reasonable and necessary on this site.

7.2 It is intended that this document is sent to the York Archaeological Trust so that they can provide an estimate for the cost of this evaluation.
AY  Addyman PV (ed) The Archaeology of York

4  The Colonia:

8  Anglo-Scandinavian York (AD 876-1066):


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APPENDIX 1

Standard Scope of Work for Archaeological Site Evaluations

A standard scope of work for archaeological site evaluation is set out below.

1. All on-site operations should be non-destructive wherever possible.

2. A plan of the site at 1 to 500 showing major constructed features on maps or in documents.

3. The depth of foundations of major post-medieval constructions (in metres AOD).

4. The position and depth of all cellars and basements.

5. Recorded sections drawn at 1:20, using standard graphical conventions and accompanied by an interpretation at the same scale. Sections should be derived from non-destructive sources wherever possible (eg, by removing cellar walls). The sections should report the depth of:

   - The natural, Roman, Anglian, Anglo-Scandinavian, and medieval horizons.
   - The extant water table.
   - Anaerobic deposits.
   - All heights to be given in metres AOD.

6. A model of the deposits over the area affected.

7. The identification and recorded status of any standing structures.

8. An estimate of the potential for environmental sequence.

9. Environmental samples of deposits suspected of being pre-Roman, sub-Roman, Anglian or medieval dark earth.

10. Collection of samples of Roman to medieval industrial residues. At
data acquisition level D.

11. Collection of pottery assemblies, Roman to medieval at data acquisition level D.

12. Plan of alignment and position of any Roman structures, and positive or negative identification of any late Roman structures.

13. Any intervention requiring removal of deposits should be at data acquisition level D-E (Roman to medieval) or A-C (post-medieval).

14. The record should consist of at least:-

(a) Written and graphic descriptions of stratigraphic units stating data acquisition level and related to the National Grid.

(b) Inventory of finds.

(c) Plans showing where intervention was made, whether destructive or non-destructive, and methods used.

(d) Plan of any structures encountered, at 1:20.

(e) Drawn sections at 1:10 or 1:20.

(f) Profile at 1:100 through the area to be developed.

(g) Photographs of the site before intervention, during intervention and after intervention.

(h) Synthesis, assessment and recommendations.

A report incorporating the above output to be deposited with York City Council within 6 weeks of the end of the excavation. All original finds and records to be deposited with the Yorkshire Museum. For definition of data recovery levels see Carver, *Underneath English Towns*, 1987, p130.
APPENDIX 2

AMENDMENT TO ARCHAEOLOGICAL EVALUATION SPECIFICATION

1.0 Introduction

1.1 This amendment to the specification for the archaeological evaluation of this site is intended to be sent to archaeological contractors other than YAT.

1.2 It is designed to ensure that the level of expertise possessed by the YAT and the Environmental Archaeology Unit (EAU), University of York, is used in the areas specified below.

2.0 Amendments

2.1 The strategy for sampling archaeological deposits should be developed in consultation with the EAU. The subsequent on-site work and analysis of the processed samples should be undertaken either by or in consultation with the EAU.

2.2 All finds processing, conservation work and storage of finds from this site must be carried out in accordance with the standards agreed by the Yorkshire Museum, the Castle Museum, and YAT and those set by the UKIC. These standards form the basis of current practice in York and all contractors will be expected to base their estimates on the implementation of those standards (see section 3 below).

2.3 Contractors other than YAT must sub-contract the ceramic spot-dating programme either to YAT or to such other agency with can demonstrate levels of professional competence and technical expertise, and access to comparative material equal to that possessed by YAT.

2.4 Where the conservation of archeological objects is necessary, this work should be undertaken either by or in consultation with the Conservation Section of YAT.
3.0 Finds Processing Standards

3.1 All finds-processing standards are agreed with the Yorkshire Museum (acting for North Yorkshire) and the Castle Museum (acting for the City of York).

3.2 On-Site Finds Processing

3.2.1 All bulk material washed.

3.2.2 All bulk material except animal bone marked. Marking and labelling materials indelible and irremovable by abrasion.

3.2.3 All bulk finds appropriately boxed and recorded on computer.

3.2.4 Identification of stone-type and tile undertaken on site.

3.2.5 All the above to be completed within two months from the end of the excavation.

3.2.6 All small finds recorded both in the finds register and on computer.

3.2.7 Small find recording system compatible with Yorkshire Museum accessioning system.

3.2.8 All small finds appropriately packaged for optimum survival of data.

3.2.9 All the above to be completed within two days of the object having been excavated.

3.3 Off-Site Finds Processing

3.3.1 All small find and bulk find data off loaded from site systems to networked system available to finds researchers, conservators and curatorial staff.

3.3.2 Computer system used to monitor location of objects to allow instant access.
3.3.3 All material stored in optimum conditions to ensure survival of data includes the following:

- Controlled storage where appropriate
- Correct packaging with inert materials
- Regular checking of the condition of objects
- Immediate selection for conservation of vulnerable material

3.3.4 All material stored in buildings with appropriate security (see storage below).

3.4 Conservation

3.4.1 All metal objects x-rayed, then selected for conservation. Non-conserved material stored in controlled conditions.

3.4.2 All organic materials appropriately treated, including prior specialist recording for materials where there is possible information loss in the process of conservation.

3.4.3 Specialist advice available in-house for wood, leather, osseous material and textile conservation and research.

3.4.4 All other classes of material treated where appropriate.

3.4.5 Special packaging undertaken for all vulnerable objects. All textiles and painted glass stored in specially-designed systems. Coins stored in specialist system.

3.5 Storage

3.5.1 All objects stored in appropriate materials and storage conditions.

3.5.2 All objects stored to allow rapid access on demand.

3.5.3 All storage at appropriate security levels, eg:
Small finds in storage approved by National Security Adviser or Areas Museum Service.
Bulk finds in storage with lower security rating but still physically secure and alarmed.

3.5.4 Storage provided for all material between excavation and the deposition of the archive with the Yorkshire Museum.

3.6 Research

3.6.1 All small finds recorded and catalogued on computer database.

3.6.2 Particular sites or groups of artifacts selected for further research and publication at different levels.

3.6.3 In-house expertise embraces material from all periods encountered in York allowing rapid and effective assessment of the material and the devising of an appropriate research strategy.

4.0 Summary

4.1 Any contractor other than YAT must include in their quotations the work for with either the YAT or EAU will be responsible as detailed above.

4.2 All such work must be completed within the time-scale detailed in the main specification. This will ensure that the results of the evaluation are assessed quickly by YCC. The processing of any archaeological details for the planning applications can then be done without delay.

Source: YCC (York City Council) 1990.