



Cotswolds Visual Impact Provision (VIP) Cotswolds National Landscape

Archaeological Statement



Report prepared for: National Grid

CA Project: CR1378

CA Report: CR1378_2

June 2024



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prepared by	Richard Morton, Principal Heritage Consultant
date	June 2024
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date	June 2024
issue	2

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SUMMARY

Project Name: Cotswolds Visual Impact Provision (VIP)

Location: Cotswold District and Tewkesbury District

NGR: N/A (Various)

This report comprises an Archaeological Statement for areas of the Cotswold VIP scheme which are the subject of planning applications to Cotswold District Council and Tewkesbury Borough Council. The report is informed by desk-based archaeological research and geophysical survey, which has been carried out in ongoing consultation with GCC Archaeology Service and Historic England. This work has provided a good level of information on the likely character and significance of archaeological remains within the planning application areas. In order to fully inform determination of the planning application, however, archaeological evaluation trenching is proposed within these areas, detailed in the Evaluation WSI comprising Appendix 1.

This Archaeological Statement has considered any contribution that the areas which are subject of the planning applications make to the 'setting' and heritage significance of heritage assets in the wider environs, and any effects upon this significance from the proposals. No adverse effects upon the heritage significance of any designated heritage assets from the planning application proposals have been identified. It has been noted that the wider Cotswold VIP scheme will likely lead to heritage benefits to various designated heritage assets along that route due to the removal of existing pylons and overhead lines.

A single minor adverse effect upon the significance of a heritage asset which may be considered a 'non-designated heritage asset' (Upper Mill paper mill) has been identified, from the construction of the CSEC compound south-east of the mill (given the later development of buildings at the mill site, their low topographic situation, and the surrounding mature trees, this effect is no more than very limited). Upper Mill is not a listed building, and there is not a current Tewkesbury list of buildings of 'local importance'. If the wider Cotswold VIP scheme is considered, the removal of the existing pylons and overhead lines to the south of Upper Mill would comprise a heritage benefit, which would likely balance against the minor adverse effect of the compound.

This report specifically addresses the areas of the Cotswold VIP scheme which require planning permission. However, it is noted that the overall Cotswold VIP scheme will lead to

notable heritage benefits to a number of heritage assets in the area, due to the removal of the current pylons and overhead power cables.

1. INTRODUCTION

Glossary of terms

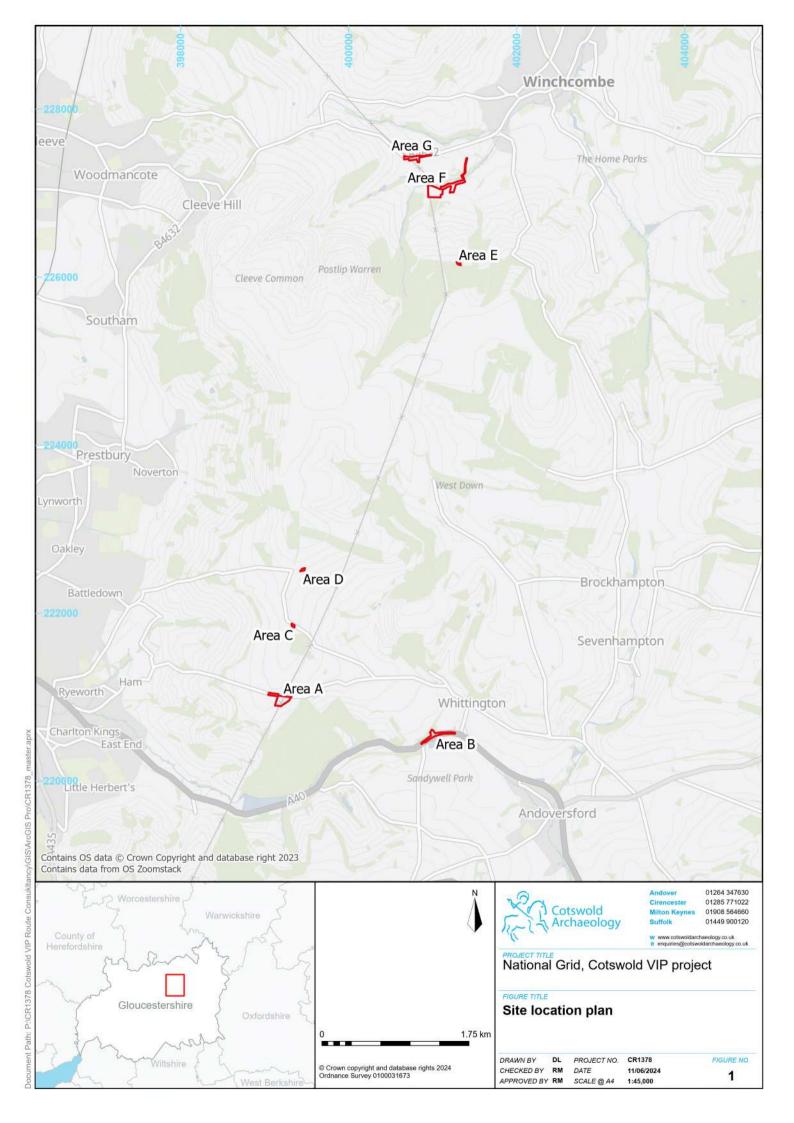
- CA Cotswold Archaeology
- ClfA Chartered Institute for Archaeologists
- 'Cotswold VIP' the 'Cotswolds Visual Impact Provision'. This refers to the overall project for undergrounding of the electric cables, including the Proposed Project planning application areas
- CSECs cable sealing end compounds. This is required where a section of cable is terminated and the circuit continues on to an overhead line.
- GCC Gloucestershire County Council
- OHLs overhead lines
- 'Proposed Project' the 'Proposed Project' in this report refers to the planning application areas and works in Cotswold District and Tewkesbury District
- SM Scheduled Monument
- SSSI Site of Special Scientific Interest

Key supporting appendices

- 1.1. This Archaeological Statement includes the following appendix:
 - Appendix 1: WSI for Archaeological Evaluation Trenching

The Cotswolds VIP project

- 1.2. The section of National Grid transmission line planned for relocation underground is approximately 7km long. The wider project is located immediately south of the B4632 and from Breakheart Plantation, runs in a south-westerly direction to the east of Cleeve Common Site of Special Scientific Interest (SSSI), past Wontley, Drypool and Wood Farms, towards Dowdeswell Wood.
- 1.3. The wider project as a whole will comprise:
 - The removal of a section of overhead lines (OHL), including the permanent removal of 16 pylons (18 pylons will be removed in total, however, two will be replaced under Permitted Development)
 - Underground cabling of approximately 7km in length
 - Two new cable sealing end compounds (CSECs) at each end (north and south) and associated replacement terminal pylons (as mentioned above), to



connect the new underground cables to the remaining existing overhead line. The compounds house support structures for the cable the terminations/sealing ends, post insulators, earth switches, defined by palisade fences. The infrastructure for these purposes will be to a height of approximately 15m. Plans of the CSEC layouts are provided in Appendix 2. The terminal pylons for the route (which provide the downlead from the overhead route to the sealing compound, and the underground route) are located outside of the planning application areas and comprise Permitted Development

- Associated temporary works to facilitate construction, including temporary/permanent access junctions and roads, a temporary haul road, construction compounds, material storage and welfare facilities
- Ancillary off-site infrastructure (including installation of arcing horns and shunt reactor installation/connection)
- 1.4. The majority of the works will be undertaken using Permitted Development rights. The CSECs require planning permission, and are the subject of this Archaeological Statement.

Consultation

- 1.5. The archaeological scope and requirements for the overall Cotswolds VIP scheme has been carried out in consultation with Historic England and Gloucestershire County Council Archaeology Service.
- 1.6. The WSIs for the geophysical surveys were approved by both Historic England and GCC Archaeology Service.

The Proposed Project planning application areas

1.7. The Proposed Project works which are subject of the planning applications are within Cotswold District and Tewkesbury District, and are illustrated on the site location plan comprising Fig. 1. The works within each area may be summarised as follows.

Cotswold District: Areas A-D

- 1.8. The Proposed Project within Cotswold District is for the construction of a CSEC at Whittington to facilitate the connection between new underground cables and the existing OHL and the associated permanent access road (and bell-mouth) to the CSEC, in addition to two temporary bell-mouths created to support the cable construction along classified roads.
- 1.9. The proposed works within the Whittington CSEC redline comprise:
 - CSEC infrastructure
 - Underground cabling from the Whittington CSEC towards the Winchcombe CSEC (note: this is Permitted Development)
 - A permanent access road to the CSEC, including a bell-mouth with Ham Road and a turning area
 - A hardstanding area where the overhead line meets with the new underground cables
 - New screening comprising native trees, woodland and scrub planting
 - Temporary bell-mouths on two classified roads to facilitate construction
- 1.10. The terminal pylon for the Whittington CSEC is located outside the CSEC redline (and is Permitted Development).

Tewkesbury District: Areas E-G

- 1.11. The Proposed Project within Tewkesbury District is for the construction of a CSEC at Winchcombe to facilitate the connection between new underground cables and the existing OHL and the associated permanent access road (and bell-mouth) to the CSEC, in addition to temporary bell-mouths created to support the cable construction along classified roads.
- 1.12. The proposed works within the Winchcombe CSEC redline comprise:
 - Installation of a terminal pylon to connect the new underground cables to the remaining existing overhead line (note: the pylon is Permitted Development)
 - CSEC infrastructure
 - Underground cabling from the Winchcombe CSEC towards the Whittington CSEC (note: this is Permitted Development)
 - A permanent access road to the CSEC, including a bell-mouth and turning area

- A hardstanding area where the overhead line meets with the new underground cables
- A retaining wall (as the CSEC will be lower than the surrounding ground level towards its northwest corner)
- New screening comprising native trees, woodland and scrub planting
- Temporary bell-mouths with the B4632 and a classified road to facilitate construction

2. HERITAGE STATUTE, POLICY AND BEST-PRACTICE GUIDANCE

National Heritage Statute and Policy

- 2.1. A summary of key national heritage statute, policy and best-practice is provided in Table 1.1, below.
- 2.2. Key national heritage statute includes the provisions of the Ancient Monuments and Archaeological Areas Act (1979); and the Planning (Listed Buildings and Conservation Areas) Act 1990. The NPPF (Chapter 16) provides key national heritage policy, along with definitions of terms in Annex 2, and the accompanying Planning Practice Guide.

Statute	Description
Ancient Monuments and Archaeological Areas Act (1979)	Act of Parliament providing for the maintenance of a schedule of archaeological remains of the highest significance, affording them statutory protection.
Planning (Listed Buildings and Conservation Areas) Act (1990)	Act of Parliament placing a duty upon the Local Planning Authority (or, as the case may be, the Secretary of State) to afford due consideration to the preservation of Listed Buildings and their settings (under Section 66(1)), and Conservation Areas (under Section 72(2)), in determining planning applications.
National Heritage Act 1983 (amended 2002)	One of four Acts of Parliament providing for the protection and management of the historic environment, including the establishment of the Historic Monuments & Buildings Commission, now Historic England.
National Planning Policy Framework (2023)	Provides the English government's national planning policies and describes how these are expected to be applied within the planning system. Heritage is subject of Chapter 16.
Conservation Principles (Historic England 2008) Guidance for assessing heritage significance, with reference contributing heritage values, in particular: evidential (archaethistorical (illustrative and associative), aesthetic, and communal.	
Good Practice Advice in Planning: Note 2 (GPA2): Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015)	Provides useful information on assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.
Good Practice Advice in Planning: Note 3 (GPA3): The Setting of Heritage Assets, Second Edition (Historic England, 2017)	Provides guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.

Statute	Description
Historic England Advice Note 12 (HEAN12) Statements of Heritage Significance: Analysing Significance in Heritage Assets (2023)	This advice note covers the National Planning Policy Framework requirement for applicants for heritage and other consents to describe heritage significance to help local planning authorities to make decisions on the impact of proposals for change to heritage assets. The advice note explores the assessment of significance and describes the relationship with between archaeological desk-based assessments and field evaluations, as well as Design and Access Statements.
Hedgerows Regulations (1997)	Provides protection for 'important' hedgerows within the countryside, controlling their alteration and removal by means of a system of statutory notification.

Table 1.1 Key national statute, policy, and guidance

2.3. This Archaeological Statement has been undertaken within the key statute, policy and guidance context presented within Table 1.1.

Cotswold District Local Plan: Heritage Policy

- 2.4. Local heritage policy is set out in the Cotswold District Local Plan 2011-2031 (adopted 3 August 2018). Key heritage policies comprise:
 - Policy EN10 Historic Environment: Designated Heritage Assets
 - Policy EN11 Historic Environment: Designated Heritage assets –
 Conservation Areas
 - Policy EN12 Historic Environment: Non-Designated Heritage Assets
- 2.5. Policy EN12 Table 6 provides 'criteria for deciding whether a building / site / structure should be considered as a non-designated heritage asset. With regards to archaeological remains, Table 6 notes that: 'Within the District the clarification provided by the PPG as to what can be considered as a non-designated site of archaeological interest will be followed. These non-designated sites may be included in the Gloucestershire Historic Environment Record'.
- 2.6. The NPPF Annex 2 defines a heritage asset as 'a building, monument site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions'. The PPG (NPPF Planning Practice Guide) provides guidance on the importance of archaeological remains under 'What are non-designated heritage assets of archaeological interest and how important are they?'. These may include remains which are demonstrably of equivalent significance to Scheduled Monuments, and a much larger category of lesser heritage significance. Such remains are still subject to conservation objectives set out in the NPPF, and decision-

making regarding such assets requires a proportionate response by local planning authorities.

Tewkesbury Development Plan

- 2.7. Heritage policies in the Tewkesbury Borough Plan 2011-2031 include the following:
 - Policy HER1 Conservation Areas
 - Policy HER2 Listed Buildings
 - Policy HER3 Historic Parks and Gardens
 - Policy HER4 Archaeological Sites and Scheduled Monuments
 - Policy HER5 Non-Designated Heritage Assets
 - Policy HER6 Tewkesbury (1471) Historic Battlefield
- 2.8. Regarding 'non-designated heritage assets' Policy HER4 notes that these include archaeological remains which also make a valuable contribution to the area's heritage. The Policy states that 'Proposals for new development should to [sic] preserve these where possible and, where appropriate, provision should be made for excavation and recording with an appropriate assessment and evaluation in line with Policy HER4'.
- 2.9. The Joint Core Strategy 2011-2031 was adopted in December 2017. The Council has also published the 'Tewkesbury Borough Council Heritage Strategy' (April 2022).

Assessment of heritage significance

2.10. The significance of known and potential heritage assets within the Site, and any beyond the Site which may be affected by the proposed development, has been assessed and described, in accordance with paragraph 200 of the NPPF (2023), the NPPF Planning Practice Guide (PPG), guidance issued by ClfA (2020), Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England 2019) and Advice Note 17: Planning and Archaeology (Historic England 2022). NPPF Annex 2 defines the 'significance' of a heritage asset as 'the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic'.

Assessment of potential development effects (benefit and harm)

2.11. With regard to potential effects upon the significance of designated heritage assets, the considerations set out in Table 2.2 are of relevance.

Level of effect	Description	Applicable statute & policy
Heritage benefit	The proposals would better enhance or reveal the heritage significance of the heritage asset.	Enhancing or better revealing the significance of a heritage asset is a desirable development outcome in respect of heritage. It is consistent with key policy and guidance, including the NPPF paragraphs 196 and 212.
No harm	The proposals would preserve the significance of the heritage asset.	Preserving a Listed building and its setting is consistent with s66 of the Planning (Listed Buildings and Conservation Areas) Act (1990). Preserving or enhancing the character or appearance of a Conservation Area is consistent with s72 of the Act.
		Sustaining the significance of a heritage asset is consistent with paragraph 196 of the NPPF, and should be at the core of any material local planning policies in respect of heritage.
Less than substantial harm (lower end)	The proposals would be anticipated to result in a restricted level of harm to the significance of the heritage asset, such that the asset's contributing heritage values would be	In determining an application, this level of harm should be weighed against the public benefits of the proposals, as per paragraph 208 of the NPPF. Proposals involving change to a Listed
Less than substantial harm (upper end)	The proposals would lead to a notable level of harm to the significance of the heritage asset. A reduced, but appreciable, degree of its heritage significance would remain.	building or its setting, or any features of special architectural or historic interest which it possesses, or change to the character or appearance of Conservation Areas, must also be considered within the context of Sections 7, 66(1) and 72(2) of the 1990 Act. The provisions of the Act do not apply to the setting of Conservation Areas. Proposals with the potential to physically affect a Scheduled Monument (including the ground beneath that monument) will be subject to the provisions of the Ancient Monuments and Archaeological Areas Act (1979); these provisions do not apply to proposals involving changes to the setting of Scheduled Monuments.
Substantial harm	The proposals would very much reduce the heritage asset's significance or vitiate that significance altogether.	Paragraphs 205 - 208 of the NPPF would apply. Sections 7, 66(1) and 72(2) of the Planning Act (1990), and the Ancient Monuments and Archaeological Areas Act (1979), may also apply.

Table 2.2 Summary of level of effect categories (benefit and harm) referred to in this report in relation to designated heritage assets, and the applicable statute and policy.

2.12. With regard to non-designated heritage assets, key consideration includes paragraph 209 of the NPPF which requires that the significance of a heritage asset affected, and the scale of harm or loss which may occur need to be considered.

Limitations of the assessment

2.13. This assessment is informed by 'desk-based' archaeological assessment, and geophysical survey. Additional information on archaeological remains will be provided by the proposed archaeological evaluation, the scope of which is set out in the Evaluation WSI in Appendix 1.

THE SETTING OF HERITAGE ASSETS

Heritage significance and 'setting'

- 2.14. The NPPF defines the 'setting' of a heritage assets as 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.
- 2.15. Guidance on assessing the contribution of setting to the significance of a heritage asset is provided in the Historic England guidance 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)' (Historic England 2017; commonly referred to as 'GPA3').
- 2.16. GPA3 clarifies that 'setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated....Its importance lies in what it contributes to the significance of the heritage asset or the ability to appreciate that significance' (HE 2017, 4). As well as visible heritage assets such as buildings, monuments and settlements, buried archaeological remains may have a setting. GPA3 notes that this may particularly be so if such remains are reflected in elements of the current landscape such as historic street or field boundary patterns, their relationship with other heritage assets or specific topographical features, or a continuity in specific forms of landuse (*ibid*, 5).
- 2.17. Many heritage assets, such as large houses and parks and gardens, have settings that have been specifically designed, or include elements of the landscape beyond in designed views (such as Picturesque 'borrowed' landscapes). GPA3 also notes five

forms of views which may contribute more to understanding the significance of heritage assets, namely:

- those where the composition within the view was a fundamental aspect of the design or function of the heritage asset
- those where town- or village-scape reveals views with unplanned or unintended beauty
- those with historical associations, including viewing points and the topography
 of battlefields
- those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected
- those where relationships between the asset and other heritage assets or natural features or phenomena such as solar or lunar events are particularly relevant

Enhancements to setting and significance

- 2.18. Change within the 'setting' of a heritage asset may harm its significance if it adversely effects specific elements contributing to significance. Change within setting may also not affect significance, or it may bring a beneficial effect by removing or altering an existing element in the landscape which is actively leading to harm. GPA3 notes that heritage benefits can be achieved by:
 - Removing or re-modelling an intrusive building or feature
 - Replacement of a detrimental feature by a new and more harmonious one
 - Introducing new views (including glimpses or better-framed views) that add to the public experience of the asset
 - Improving public access to, or interpretation of, the asset including its setting

Temporary and long-term effects upon setting and significance

2.19. Effects upon the significance of a heritage asset, through change in its setting, may be in the short term such as during construction phase. As well as visual effects from construction activity, such effects may include non-visual factors such as potential noise, vibration, traffic movement and smells (HE 2017, 11). GPA3 notes that whether an effect is temporary or long-term is a consideration in judging effects upon 'setting' (HE 29017, 12-13).

3. METHODOLOGY AND INFORMATION SOURCES

- 3.1. A phased approach to archaeological research and investigation for the Cotswold VIP scheme has been taken in accordance with industry best-practice. The current report is issued following archaeological research and geophysical survey, the interim results of which are provided below. The approach to the next stages of survey and mitigation will be informed by the results of these works, and discussion with statutory archaeological consultees.
- 3.2. The work completed to date includes the following:
 - Phase 1 Desk-Based Survey (Cotswold archaeology 2021)
 - Additional Phase 1 data collection conducted by Cotswold Archaeology in September 2023 following changes to the Priority Zones comprising trhe Study Area (including review of available information on Waltham Villa and its landscape)
 - Geophysical Survey conducted by SUMO Surveys (the northern half of the study area) and Magnitude Surveys (the southern half of the study area)
- 3.3. The results of these previous investigations are summarised below, with reference to full reports where available.

DESK-BASED ASSESSMENT

- 3.4. Initial 'Phase 1' desk-based assessment was carried out in 2021 by Cotswolds Archaeology which considered a provisional route. The assessment addressed a 'study area' of 2km width, centred on a provisional route option.
- 3.5. The assessment was informed by the information sources summarised in Table 2.1 below. This information was then collated into a single project database with categories to inform project considerations (including, for example, designated status, potential significance, information sources, related entries, etc).

Source	Data
National Heritage List for	Current information relating to designated heritage
England (NHLE)	assets, and heritage assets considered to be 'at risk'.
Gloucestershire Historic	Heritage sites and events records, Historic Landscape
Environment Record (HER)	Characterisation (HLC) data, and other spatial data
	supplied in digital format (shapefiles) and hardcopy.
Historic England Archives	Additional sites and events records, supplied in digital
(EHA)	and hardcopy formats.

Historic England's Aerial	Vertical and oblique aerial photography
Photograph Research Unit	
Environment Agency website	LiDAR imagery and point cloud data, available
	from the Environment Agency website.
Genealogist, Envirocheck,	Historic (Ordnance Survey and Tithe) mapping
Know your Place & other	in digital format.
cartographic websites	

Table 2.1 Key data sources used in the 2021 Phase 1 Assessment

- 3.6. The Phase 1 Assessment identified a number of designated and non-designated heritage assets within the study area and recorded the landscape character and hedgerows defined as 'important' under the Hedgerows Regulations 1997.
- 3.7. The Gloucestershire Historic Landscape Characterisation project (Hoyle 2006) includes numerous defined historic landscape types, which are discussed in the present report in regard to the Areas under consideration.

Updated desk-based information

- 3.8. In October 2023, the area under consideration for the scheme was revised, and expanded. In order to update and enhance the original Phase 1 Assessment information, revised and updated desk-based research was carried out.
- 3.9. For areas within the previous Phase 1 Assessment area, revised searches of the Gloucestershire Historic Environment Record and Historic England Archives were carried out, and any new information (subsequent to the 2021 assessment) added to the project database. Additional areas outside of the former Phase 1 Assessment area
- 3.10. For areas outside of the previous Phase 1 Assessment area, the full data sources set out in Table 2.1 which informed the Phase 1 Assessment were examined, and the data also added.

Informing route options: High, Medium and Low Priority Zones

3.11. As part of the ongoing wider Cotswold VIP scheme route options assessment, areas of land along and around potential route options was identified as either 'High', 'Medium', or 'Low' Priority Zones, depending on the likely requirement for inclusion of that land within the eventual Cotswolds VIP scheme works. Areas identified as 'High' and 'Medium' Priority were the focus of the geophysical survey.

2023-2024 GEOPHYSICAL SURVEY

- 3.12. The geophysical survey of the Cotswolds VIP scheme was undertaken by SUMO Surveys, who covered the northern zone (broadly corresponding with Tewkesbury District), and Magnitude Survey who covered the southern zone (broadly corresponding to Cotswold District). The survey reports (SUMO Survey 2023; Magnitude Surveys 2024) inform this Archaeological Statement.
- 3.13. The results of the geophysical survey inform the discussion of each of the Areas below, and the proposed further evaluation works (summarised below and detailed in the Appendix 1 Evaluation WSI).

4. ARCHAEOLOGICAL STRATEGY

Informing information and proposed evaluation strategy

- 4.1. The following discussion of the archaeological resource of each of the planning application areas is based upon the desk-based research and geophysical survey information, as described in Chapter 3 above.
- 4.2. The NPPF (para 200) states that, with regard to information on heritage assets informing planning applications, 'the level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the impact of the proposal on their significance'. It further states that, 'where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation'. As described above, desk-based assessment and geophysical survey have been carried out for the planning applications, and also the wider Cotswold VIP scheme (subject to Permitted Development). These works provide a good level of information on the anticipated archaeological resource of the planning application areas, and the wider undergrounding route.
- 4.3. In order to provide a detailed level of information on archaeological remains and to facilitate an informed archaeological mitigation and management strategy, archaeological evaluation trenches will also be carried out prior to determination of the two planning applications which are the subject of this report. The scope and methodology of the evaluation work is set out in the Evaluation WSI in Appendix 1. The present chapter summarises the archaeological resource of each planning application Area, based on the completed information, and briefly summarises the additional evaluation trench work which will be carried out to inform determination of the application.
- 4.4. The archaeological evaluation works for the planning application areas, carried out in the determination period, will enhance the information base provided by the desk-based research and geophysical survey.
- 4.5. Following these works, suitable further survey and mitigation measures will be discussed and agreed with GCC Archaeology Service and Historic England. Additional agreed works will form two key phases:

- Pre-commencement archaeological excavation
- Construction phase archaeological monitoring and recording
- 4.6. The overall project objective has been to carry out necessary archaeological works in advance of the construction phase as far as possible through the informed staged survey work.

Overall approach to the evaluation strategy for the planning application Areas

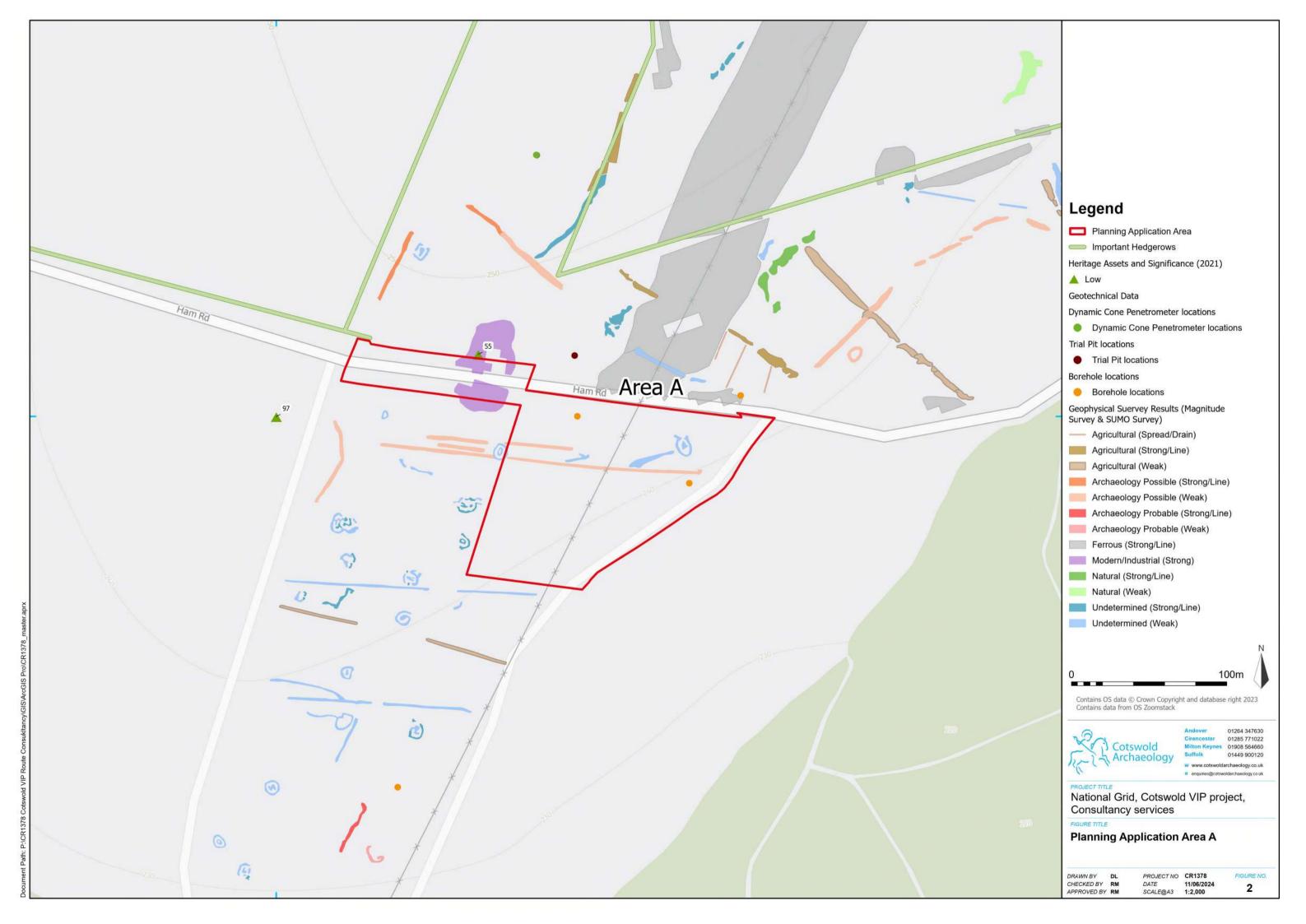
- 4.7. With regard to each of the planning application Areas, the proposed trench locations are informed by:
 - Magnetic anomalies identified by the geophysics (including probable and possible archaeological remains, and 'uncertain' responses')
 - The phase 1 'desk-based' assessment work
 - Use of the trenches to sample a percentage of the site areas, including areas where magnetic anomalies were not recorded
 - A minimum 2% sample rate was considered appropriate, and the sample rates summarised below and set out in the Evaluation WSI (Appendix 1) are all over 2%
 - An additional contingency availability of additional trenches to be put in reserve and utilised if additional information is required to successfully characterise and assess the value of the archaeological remains

5. BASELINE INFORMATION, ARCHAEOLOGICAL IMPACTS AND EVALUATION SUMMARY

COTSWOLD DISTRICT

Area A

- 5.1. Area A (Fig. 2) comprises an area of c. 1.9ha north-west of Dowdeswell Woods, on the Ham Road (which runs from Whittington to Ham and thence Charlton Kings).
- 5.2. Neolithic to Bronze Age worked flints have previously been found in the field to the west (Fig. 2, 97). A Roman settlement site was discovered during clearing of 'Whittington Wood' (now known as 'Arle Grove'), to the north of Whittington (HER Ref: 5456, outside of the area on Fig. 2). The earthwork remains of a 19th-century quarry are visible on the northside of Ham Road bordering this Area, which was further delineated by the geophysical survey (identified in pink as a 'modern/industrial' response on Fig. 2).
- 5.3. The geophysical survey identified several closely=spaced linear trends adjacent to and (two) within the Area, identified as 'possible archaeology'. The closely-spaced and straight nature of these is in fact suggestive of more recent activity such as post-medieval drainage or 'ridge and furrow'; which would be of insufficient archaeological interest to comprise a 'heritage asset'. On present information, the works in Area A would not impact any archaeological remains known to comprise 'heritage assets'.
- 5.4. However, evaluation trenches are proposed to test the character of these features further, and also to test further parts of this Area for which the desk-based research and geophysical survey have not identified potential archaeological features. The proposed sample comprises three 50m x 1.8m trenches and three 30m x 1.8m trenches (see Appendix 1). This comprises a 2.3% sample of Area A.
- 5.5. The requirement for any additional trenches, used as part of a contingency, will be discussed and agreed if required following the initial results of the evaluation, with GCC Archaeology Service and Historic England.
- 5.6. The results of the evaluation will, along with the current information base, inform conditions for pre-commencement or construction phase mitigation measures for agreement with GCC Archaeology Service and Historic England.



- 5.7. The northern and eastern boundaries of Area A are illustrated on the 'Plan of the Parish of Whittington in the County of Gloucester' of 1838, and the hedgerows on these boundaries will comprise 'important' hedgerows under the criteria for 'archaeology and history' of the Hedgerows Regulations 1997. No ridge and furrow earthworks are observable within Area A on LiDAR imagery, and the geophysical survey did not record likely below-ground remnants of medieval furrows. Area A lies within Historic Landscape Characterisation type A3, which comprises regular organised enclosure not based upon former unenclosed cultivation patterns (this does not comprise a 'heritage asset' in and of itself).
- Area A lies 600m south of the Scheduled Monument bowl barrow (north-west of Wood Farm). The barrow is located on the edge of the escarpment (at a height of between 250m-255m aOD) with extensive views across the lower lands to the west (now largely comprising the extensive settlement of Cheltenham) and south. Area A lies at a slightly lower height than the barrow (c. 245m aOD) with two large enclosed fields and hedged boundaries between, plus the course of the Cotswold Way and Ham Road. The hedgerows bordering Ham Road comprise mature vegetation. There is little inter-visibility between Area A and the barrow, and it is not anticipated that the infrastructure within Area A would be clearly appreciable in these wider views. If elements were glimpsed, they would not interrupt views from the barrow, and would be some 600m away within a much wider and extensive view south. Thus, it is not anticipated that the works for Area A would adversely affect the archaeological interest of the Scheduled barrow.
- 5.9. Area A lies c. 1.2km west-south-west of the Grade II listed buildings at Whalley Farm, which date from the 17th and 18th centuries. There is no clear inter-visibility between the listed buildings and Area A. The Area forms a relatively small part of the much wider setting of these designated heritage assets, and does not make a specific contribution to their architectural or historical interest. Thus, it is not anticipated that the works for Area A would adversely affect the architectural or historical special interest of the listed buildings.
- 5.10. Whilst construction activity in the short-term may potentially be visible from these heritage assets, this would be temporary, and would not be anticipated to harm an element of their setting which specifically contributes to their special interest.

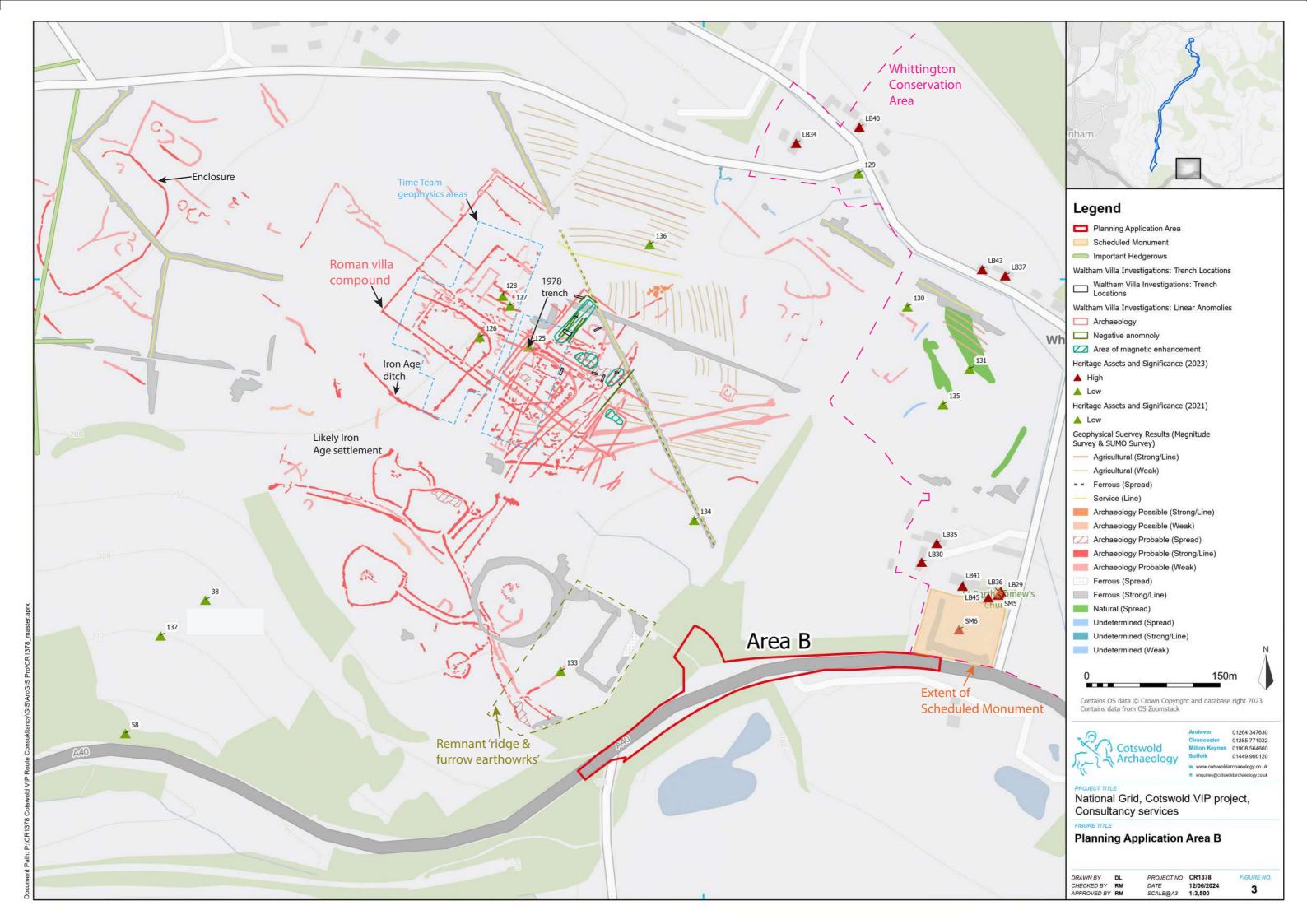
5.11. It may be noted that the wider Cotswolds VIP scheme will very likely lead to enhancement to heritage assets in the area, due to the removal of the current pylons and overhead lines. This would include the Scheduled barrow, which the current pylons and overhead lines pass close to moving north.

Area B

5.12. Area B comprises an area of c. 1.3ha, and comprises an area of works required to facilitate access to the southern connector road for the wider Cotswold VIP scheme. The majority of this area includes the course of the A40 south of Whittington, and the northern part (which will form the beginning of the connector road here) comprises woodland. There are no recorded archaeological features within the Area. The easternmost extent of Area B lies adjacent to the designated Scheduled Monument of Whittington Moated site (HE List Entry: 1341326). The moat lies on the south side of the manor house, which has 16th-century origins, and is a Grade I listed building (Fig. 3). The Grade II* listed Church of St Bartholomew lies immediately east of the manor house, and the churchyard cross in the churchyard is also a Scheduled Monument and Grade II listed building. A group of five Grade II listed tomb monuments also lies in the churchyard.

Waltham Roman Villa: 1970s trench

- 5.13. The site of Waltham Roman Villa is illustrated in Fig. 3, to the north of Area B. In the 1970s abraded sherds of Roman pottery were found in the field known locally as 'Waltham' some 600m north-west of the Scheduled Whittington Court Roman Villa. In late August to early October 1978 an archaeological trial trench was dug by local archaeologist Mr Wilf Cox. The trench was 7m in length and 2m wide, and was excavated at right angles to the hedgerow (Fig. 3, 125, and annotated).
- 5.14. The results of the 1978 trial trench investigation are reported in the issue of *Glevensis* for 1979 (No. 13; Cox 1979). The trench recorded intact masonry walls surviving to heights of some four courses (c. 0.45m high and 0.50-57m wide), and stone layers interpreted as possible make-up material for internal or external floors. Thick layers of demolition material (c. 0.50-60m thick) including stone, wall plaster, mortar, flue tile, and floor and roof tile were recorded above the likely former floor levels. These remains of in-situ buildings and their demolition material were cut by a number of later pits (which possibly retrieved building material for re-use). The upper levels also gave indications of later surfaces having been created on top of the demolition material.



5.15. The trench recorded the natural brown clay deposits from c. 0.75m below present ground levels (i.e. below the surface of the field). The uppermost part of the surviving remains of the intact walls were found from as shallow as 0.25m below present ground surface. The lower course of the wall was cuit into the natural brown clay (the full depth of the wall foundation was not excavated below that). Mixed deposits of demolition material, with evidence of later surface use at upper levels, lay adjacent to the surviving wall courses, also from depths as shallow as 0.25m below present ground level. The results indicated that the former villa surfaces may have been situated at around 0.60m below present ground level, beneath the demolition material.

2000 Time Team trial trench and geophysical survey investigations

- 5.16. In 2000 an investigation was conducted by Time Team with the aim of placing the previous investigation within a wider context. The 2000 investigation work included a magnetometer and a resistivity geophysical survey in two fields, illustrated on Fig. 3. Following the completion of the geophysical survey, nine trenches were excavated to test the results of the survey and provide dating evidence. The location of the geophysical survey works and the trial trenches are provided on Fig. 3.
- 5.17. Three trenches were excavated in the area where the 1978 trench had identified buildings (the three trenches immediately north of ref: 125 on Fig. 3), and these confirmed the presence of walls and identified evidence of an *opus signinum* floor. Six trenches were excavated in the field to the west, where the villa compound continues. The trenches identified remains of internal and exterior walls, floor surfaces, and an oven structure. A further trench tested a ditch *c.* 5m in width which appeared on a different alignment to the Roman ditches, suggesting an Iron Age origin. A trench was placed over this ditch feature (the trench nearest ref: 126 on Fig. 3) and confirmed an Iron Age date.
- 5.18. The trenches recovered in total some 602 pottery sherds which primarily dated from the 2nd and 3rd centuries, suggesting increased activity in these centuries. Evidence for 4th century occupation was scant (as opposed to the late 4th century pottery found at Whittington Villa to the south-east). Whilst opus signinum was identified across the trenches, only a small number of tesserae were identified, suggesting that any such floors present in the buildings were robbed out and reused. This would be consistent with the evidence for later pits for building material suggested in the 1978 trench discussed above.

- 5.19. The work in 2000 by Time Team initially identified a curving boundary ditch in Field S60 which appeared likely to be of late Iron Age date. The present 2023-4 geophysical survey has further defined this feature, which lies partially under the later rectangular Roman villa complex. The enclosure is approximately 120m across, north-east to south-west, and comprises three sides; that on the west side appearing to be open. This enclosure is similar in form to a second enclosure to the west (Fig. 3), which is some 150m across. Although more rounded in character, it also displays an open western side.
- 5.20. The newly identified features here seem very likely to also be of Iron Age date, comprising a long trackway or road, with narrow tracks running from that to smaller enclosures (often referred to as 'banjo enclosures'). The results give an indication of potential internal features, which may represent a large settlement site. The element of the Iron Age ditch excavated as part of the 2000 Time Team works was found cut into the natural clays from c. 0.40m below present ground level. Malvernian pottery was recovered, which dates from the 1st century B.C. to the 1st century A.D. (Holbrook 2008).

Discussion

- 5.21. It appears likely that the Iron Age settlement north-west of Area B was replaced in the 1st century A.D. when the Waltham Roman Villa was constructed, with at least three phases of buildings. The results of previous works discussed above provide evidence of a substantial building to the north. The lower courses of walls were cut into the natural clays, and the uppermost parts of walls have been found from around 0.40m below ground level. Floor levels have been recorded at around 0.53m below ground level. There are extensive demolition deposits overlying these remnant structural features, which include rubble, wall plaster, tile and pottery, which appear to occur from depths of c. 0.20m below ground level (beneath the developed topsoil deposit).
- 5.22. A potential first century A.D. origin for the villa is suggested by the presence of terra nigra pottery, and occupation seems to have finished by the end of the third century at the latest (*ibid*). Holbrook has noted the nearby villa site at Withington (excavated by Lysons in 1811) which also overlay a Late Iron Age curvilinear enclosure (*ibid*). A potential second century origin has also been suggested for Whittington Court villa, to the south-east, although the evidence remains limited. In the wider context of the Cotswolds, the evidence for both first and second century villas remains very limited.

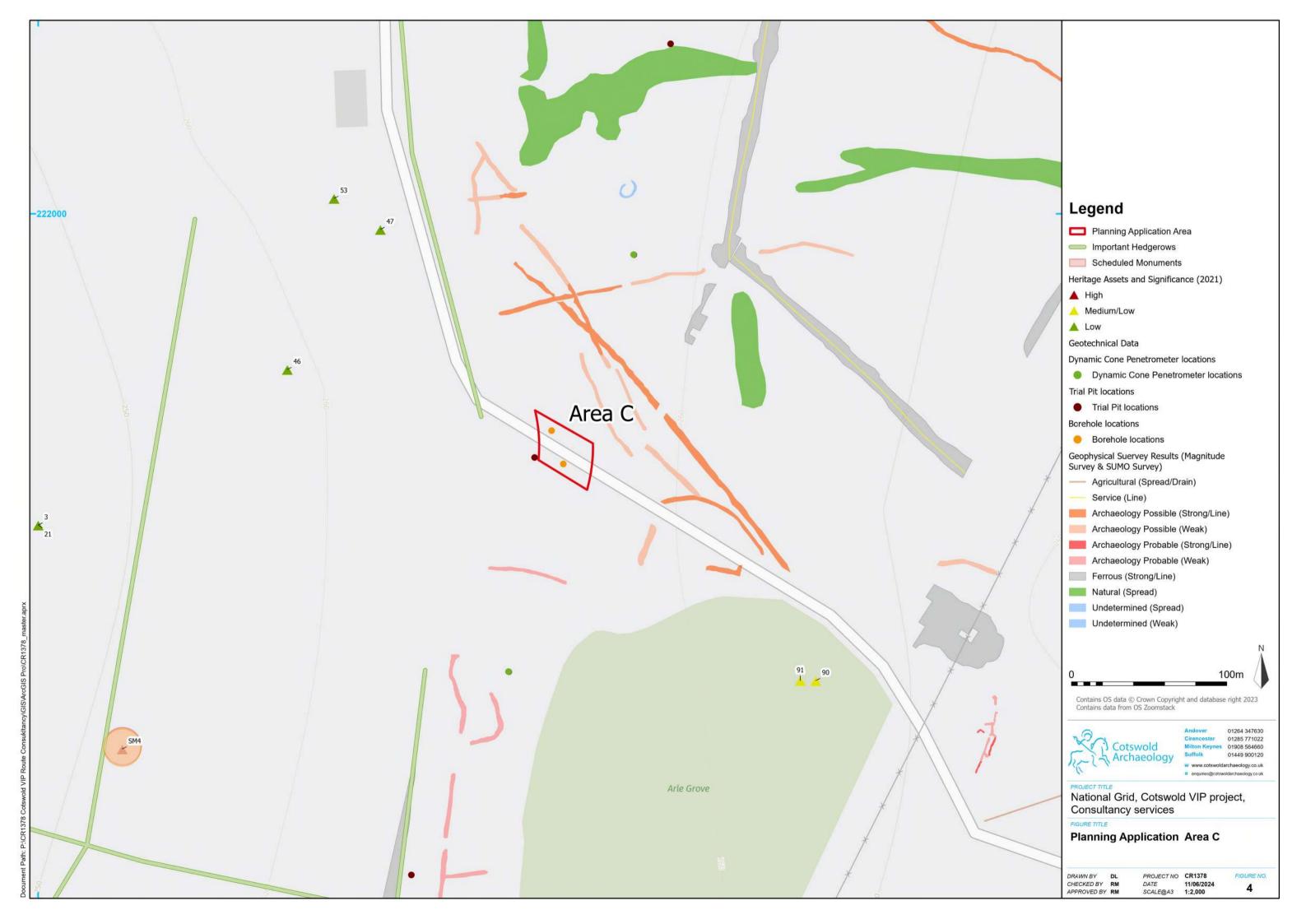
Whittington Court Scheduled Moat

- 5.23. As noted above, the easternmost extent of Area B lies adjacent to the designated Scheduled Monument of Whittington Moated site (HE List Entry: 1341326). The moat lies on the south side of the manor house, which has 16th-century origins, and is a Grade I listed building (Fig. 3). The Grade II* listed Church of St Bartholomew lies immediately east of the manor house, and the churchyard cross in the churchyard is also a Scheduled Monument and Grade II listed building. A group of five Grade II listed tomb monuments also lies in the churchyard. The area of the Scheduled moat lies between these listed buildings of Whittington Court, and the northern side of the A40 (Fig. 3). Two 'L'-shaped arms of the moat survive up to around 10m wide (orientated 58m north-east, and 72m south-east), under heavy tree cover and undergrowth (the internal area is more open, and comprises the lawns on the southern side of the house). On the western side, the bank of the moat has been incorporated into the garden of Whittington Court.
- 5.24. The redline area of Area B lies immediately adjacent to, but not within, the defined Scheduled Monument as mapped on the Historic England National Heritage List website.
- 5.25. Area B lies immediately to the south-east of the remains associated with Waltham Roman Villa and adjacent Iron Age settlement. The A40 is likely to have at least medieval origins as a road course, but, as far as is known, post-dates the Iron Age and Roman periods. It is likely that its construction and subsequent repairs/surfacing have significantly impacted upon any former earlier remains on its course.
- 5.26. Given the current road use and woodland cover of this Area, no additional evaluation trenching is proposed prior to determination of the application.
- 5.27. It is proposed that conditions for pre-commencement or construction phase mitigation measures are agreed with GCC Archaeology Service and Historic England.
- 5.28. The boundaries of the A40 are illustrated on the 'Plan of the Parish of Whittington in the County of Gloucester' of 1838, but the woodland on these boundaries is notably wider than that normally considered as a hedgerow. Given the landuse of Area B, no ridge and furrow earthworks are observable within it from LiDAR imagery. Area A lies within Historic Landscape Characterisation type A4, which comprises less regular organised enclosure partly reflecting former unenclosed cultivation patterns. This does not comprise a 'heritage asset' in and of itself.

5.29. In the short term, there is likely to be works traffic carrying out the necessary works at this junction, and the use of the connector road for works traffic during the construction phase. Although this is likely to be seen and heard from the Scheduled Monuments and listed buildings at Whittington Court, it is noted that the A40 already forms a busy 'A' road, and that there are many mature trees around the edge of the moated site and adjacent to the western side of the house. Thus, these shorter-term effects would not be considered likely to adversely affect the architectural or historical special interest of the heritage assets here. No long-term effects are identified.

Area C

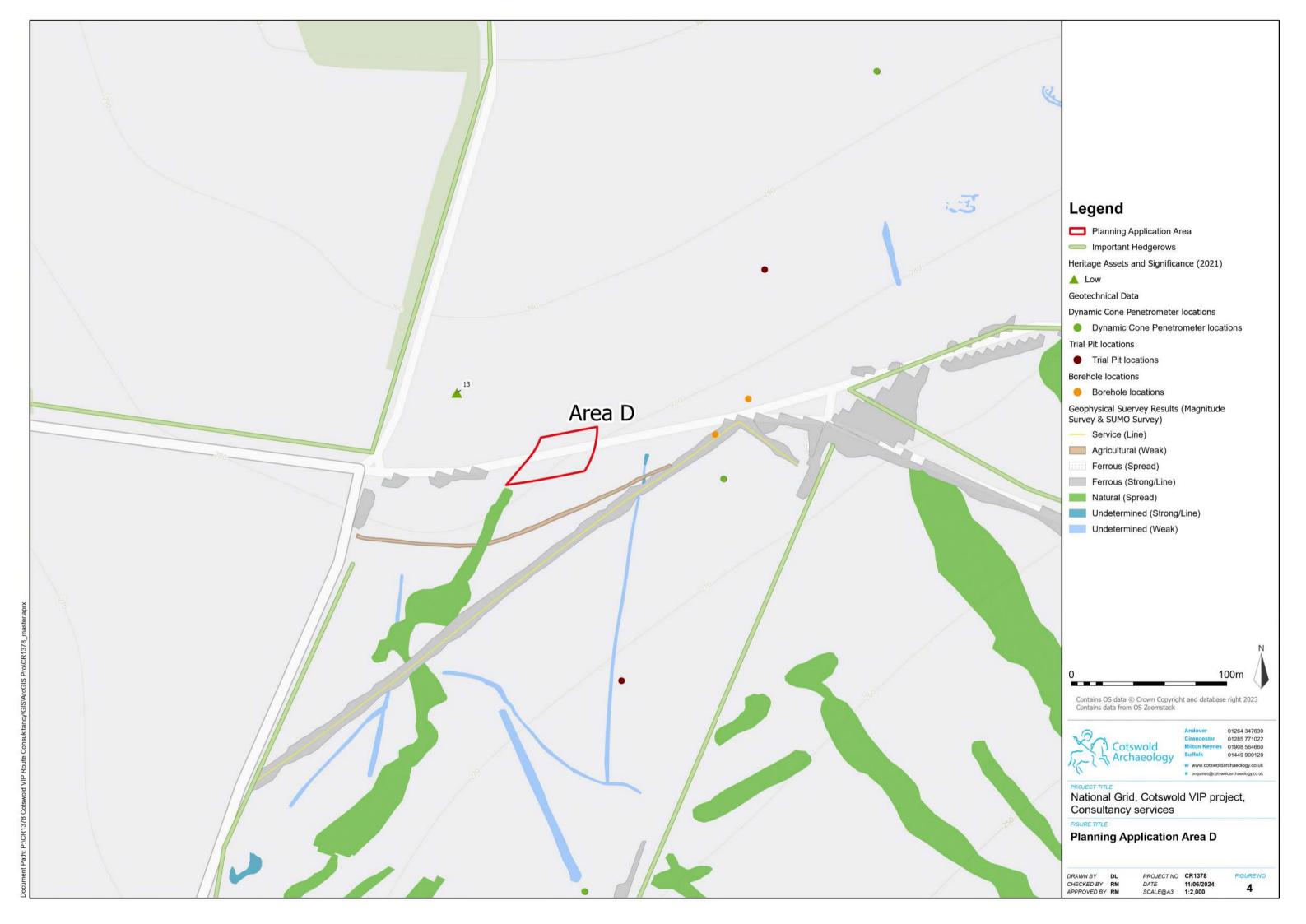
- 5.30. Area C comprises an area of c. 0.1ha, and comprises an area of works where the wider undergrounding scheme is required to cross the road. It lies to the west of the Arle Grove Nature Reserve. A Scheduled Bronze Age round barrow (north-west of Wood Farm: Historic England Ref: 1017336) lies around 320m to the south-west of Area C (Fig. 3), and two further bowl barrows of the same broad period are situated in Arle Grove, some 180m to the south-east (Fig. 3, 90 and 91). A long linear feature was identified as 'possible archaeology' in the geophysical survey to the north of this Area, plus several weaker linear anomalies, although no anomalies indicative of archaeological remains were identified within the Area itself.
- 5.31. Evaluation trenches are proposed to test the Area further. The proposed sample comprises two 15m x 1.8m trenches (see Appendix 1). This comprises a 5.4% sample of Area C.
- 5.32. The requirement for any additional trenches, used as part of a contingency, will be discussed and agreed if required following the initial results of the evaluation, with GCC Archaeology Service and Historic England.
- 5.33. The results of the evaluation will, along with the current information base, inform conditions for pre-commencement or construction phase mitigation measures for agreement with GCC Archaeology Service and Historic England.
- 5.34. The hedgerows bordering the road on both sides are illustrated on the 'Plan of the Parish of Whittington in the County of Gloucester' of 1838 and these boundaries will comprise 'important' hedgerows under the criteria for 'archaeology and history' of the Hedgerows Regulations 1997. No ridge and furrow earthworks are observable within Area C on LiDAR imagery, or recorded as below-ground furrows in the geophysical survey. The southern part of Area C comprises historic landscape type C2 (early



- woodland cleared in the post-medieval period) and the northern part type A3 (regular organised enclosure, not reflecting earlier unenclosed cultivation patterns). Neither of these historic landscape types comprises a 'heritage asset' in and of itself.
- 5.35. Extensive views are available from the Scheduled barrow to the south and west, from the edge of the escarpment. In the short term, there is likely to be construction traffic carrying out the necessary works at this crossing. Although this is likely to be seen and heard from the Scheduled Monument, this will be a temporary effect, and would not block or render views from the barrow less intelligible, or reducing understanding of the barrow in its wider landscape. Thus, these shorter-term effects would not be considered likely to adversely affect the archaeological interest of the Scheduled Monument. In the long-term, the wider Cotswold VIP scheme will provide a heritage benefit, due to removal of the nearby pylons and overhead cables from the views east from the barrow. The non-Scheduled barrows to the south-east of Area C are within woodland, and no effects from the proposals would be anticipated.

Area D

- 5.36. Area D also comprises an area of c. 0.1ha, and comprises an area of works where the wider undergrounding scheme is required to cross the road. It lies north of the Arle Grove Nature Reserve, and east of Battledown. The Area lies 450m south of the Scheduled Bronze Age bowl barrow (south-east of Piccadily Farm; beyond the area shown on Fig. 4). A post-medieval quarry is visible as an earthwork immediately to the north of the Area, within an uncultivated part of the arable field to the north of the road. No magnetic anomalies of archaeological remains were identified within Area D itself in the geophysical survey.
- 5.37. Evaluation trenches are proposed to test the Area further. The proposed sample comprises two 15m x 1.8m trenches (see Appendix 1). This comprises a 5.4% sample of Area D.
- 5.38. The requirement for any additional trenches, used as part of a contingency, will be discussed and agreed if required following the initial results of the evaluation, with GCC Archaeology Service and Historic England.
- 5.39. The results of the evaluation will, along with the current information base, inform conditions for pre-commencement or construction phase mitigation measures for agreement with GCC Archaeology Service and Historic England.



- 5.40. Area D lay within the parish of Sevenhampton. A tithe map for the parish has not been located for this assessment, and thus the hedgerows bordering the road have not been identified as 'important' under the criteria for archaeology and history in the 1997 Hedgerows Regulations. No ridge and furrow earthworks are observable within Area C on LiDAR imagery, or recorded as below-ground furrows in the geophysical survey. Area D lies within Historic Landscape Characterisation type A3, which comprises regular organised enclosure not based upon former unenclosed cultivation patterns (this does not comprise a 'heritage asset' in and of itself).
- 5.41. As noted above, Area D lies 450m south of the Scheduled Bronze Age bowl barrow (south-east of Piccadily Farm). In the short term, there is likely to be construction traffic carrying out the necessary works at this crossing. This may potentially be appreciated from the Scheduled Monument, but will be limited by the intervening distance and vegetation. Any such appreciation of the works will be a temporary effect, and would not block or render views from the barrow less intelligible, or reducing understanding of the barrow in its wider landscape. Thus, these shorter-term effects would not be considered likely to adversely affect the archaeological interest of the Scheduled Monument. In the long-term, the wider Cotswold VIP scheme will provide a heritage benefit, due to removal of the nearby pylons and overhead cables from the views east from the barrow.

TEWKESBURY DISTRICT

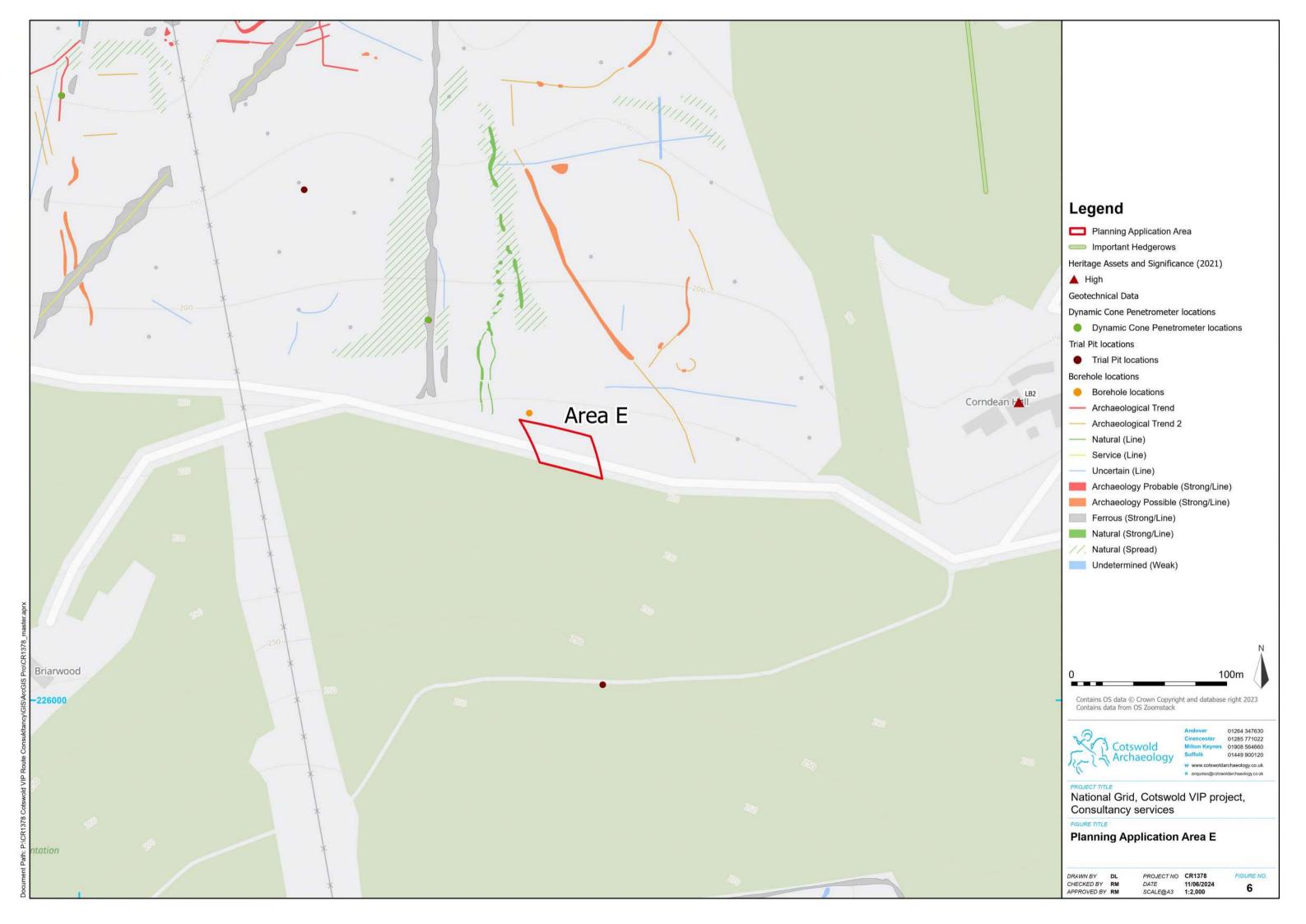
Planning Application Area E

- 5.42. Area E lies on the Cotswold Way on the northern edge of the woods, between Belas Knap Neolithic long barrow c. 970m to the south-east, and Postlip Hall Farm c. 1.5km to the north-west. The Grade II* listed building of Corndean Hall and its later 19th century coach house (Grade II listed) lies to its east (Fig. 6). The geophysical survey identified a likely prehistoric enclosure c. 300m to the north-west, the lower end of which is illustrated on Fig. 6.
- 5.43. The total area of Area E is c. 0.1ha. It comprises the road, and trees to the north and south, and is required for works in undergrounding the cables at the road. Given the landuse, evaluation trenches are not proposed.
- 5.44. It is proposed that conditions for pre-commencement or construction phase mitigation measures are agreed with GCC Archaeology Service and Historic England.

- 5.45. Area E is not annotated on the elements of Winchcombe parish recorded on the tithe map survey, including the 'Map of Lands in the Parish of Sudely Manor with parts of the Hamlets of Abbey-Demenses and Langley Sudely Tenements and Coates in the Parish of Winchcomb in the County of Gloucester' of 1848. Thus, the hedgerows bordering the road have not been identified as 'important' under the criteria for archaeology and history in the 1997 Hedgerows Regulations. No ridge and furrow earthworks are observable within Area E on LiDAR imagery, or recorded as belowground furrows in the geophysical survey. The northern part of Area E lies within historic landscape characterisation type A2 (less irregular enclosure partly reflecting former unenclosed cultivation patterns, and not a 'heritage asset' in and of itself) and the southern part in type C1 (surviving early woodland, which comprises part of Breakheart Plantation). This latter is of some heritage interest as an area of woodland established since at least the 19th century, and likely earlier, but is not a 'heritage asset' in and of itself.
- 5.46. The Grade II* listed early 19th-century house of Corndean Hall lies c. 260m east of Area E. Its Grade II listed late 19th-century coach house lies on the eastern side of the house. A belt of mature trees lies on the western side of the house, between it and Area E. The woods lie immediately to the south of the road. In the short term, there is likely to be works traffic carrying out the necessary works at this route connection. This use may potentially be seen and heard from the listed buildings and their close vicinity, but this short-term, temporary effect would not be considered likely to adversely affect the architectural or historical special interest of the buildings. In the longer term, the Cotswold VIP scheme will remove the existing pylons and overhead lines on the western side of the listed buildings, likely providing a heritage benefit.

Planning Application Area F

- 5.47. Area F lies at the northern end of the Cotswold VIP scheme and is illustrated on Fig. 7. It lies south of the B4632, which runs west from Winchcombe to Cleeve Hill. The Area lies c. 400m north of a potential prehistoric enclosure identified in the geophysical survey (beyond the area illustrated on Fig. 7). A further possible enclosure, defined by three sides, was identified by the geophysics c. 200m to the south (Fig. 7).
- 5.48. Area F lies south-east of Upper Mill (Fig. 7, 31), on the River Isbourne, and south of Middle Mill (Fig. 7, 33) in the hamlet of Coates. Upper Mill is thought to be the site of



the medieval corn mill, and from the 18th century was developed as a fulling mill (for the cleaning of woven cloth) and then a paper mill. The latter included the production of sheets of paper from a pulp of wood and other materials (including cloth), in a process which was industrially developed through the 18th and 19th centuries. A Victorian gas holder was also located at the site. Middle Mill, further east on the river, is known to have been in existence by 1728. The buildings are not listed.

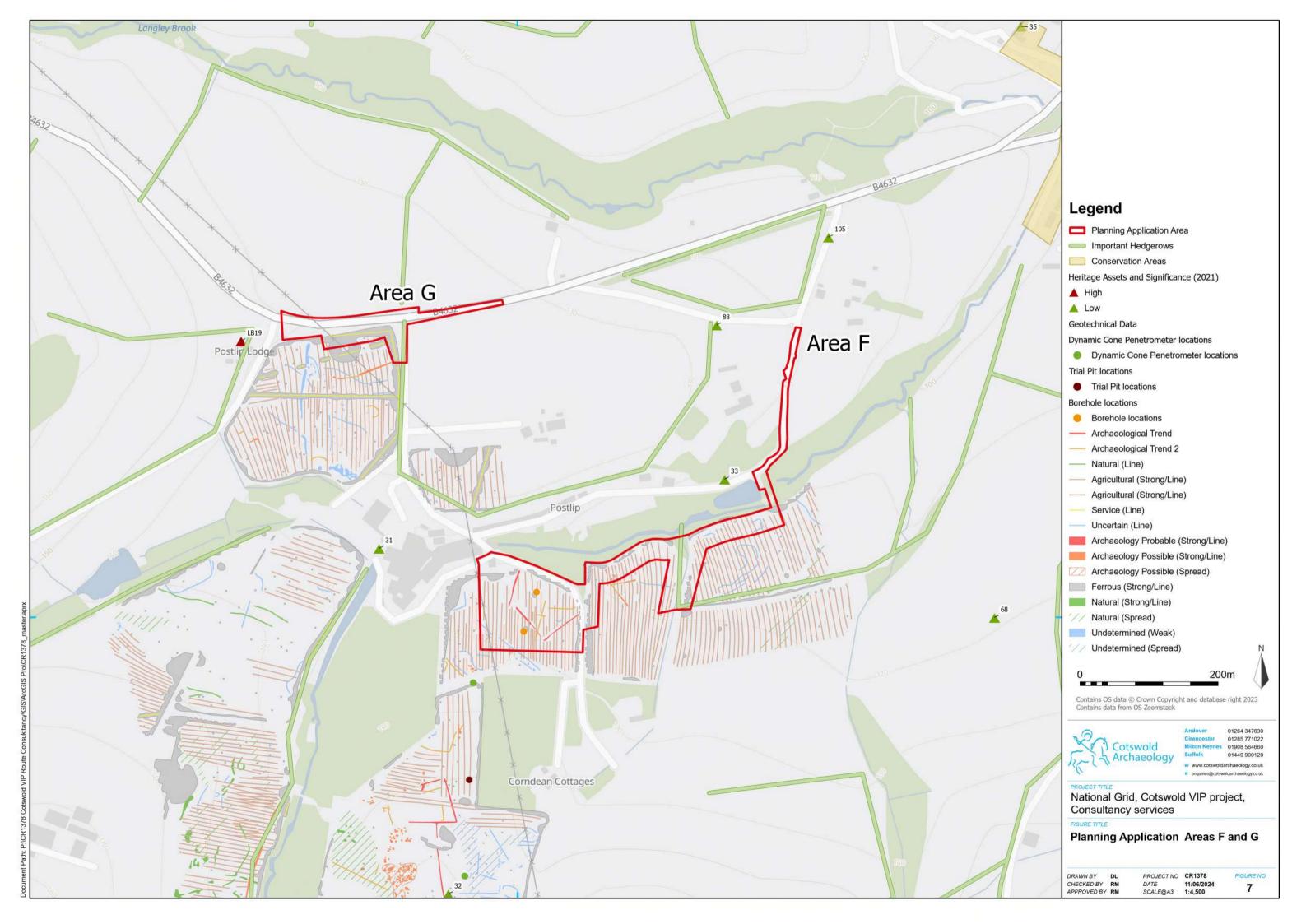
- 5.49. The geophysical survey identified several linear magnetic anomalies in the western part of Area F which may represent a further enclosure, possibly a pre-medieval field enclosure associated with the other nearby enclosures discussed above.
- 5.50. The Gloucestershire HER records that fields between Upper Mill and Breakheart Plantation, to the south, contain 'ridge and furrow' earthworks which were observed on aerial photographs. Review of LiDAR data illustrates that these earthworks are no longer extant, and have presumably been eroded by post-war ploughing. The geophysical survey records traces of the below-ground furrows in Area A (Fig. 7), which are in general consistent with former medieval ridges and furrows. As these are not intelligible above ground, the below-ground remnants are not of sufficient archaeological interest to comprise a 'heritage asset'. Area F is largely situated within historic landscape character type A2, which comprises less irregular enclosure partly reflecting former unenclosed cultivation patterns (and does not comprise a 'heritage asset' in and of itself). To the east, the connecting road area includes small parts of type A4 (less regular organised enclosure partly reflecting former unenclosed cultivation patterns). This type also does not comprise a 'heritage asset' in and of itself.
- 5.51. Area F is c. 3.5ha in size. The following evaluation strategy is proposed in the Evaluation WSI (Appendix 1):
 - Five 50m x 1.8m evaluation trenches
 - Six 30m x 1.8m évaluation trenches
- 5.52. This evaluation strategy provides a 2.2% sample of Area F.
- 5.53. The evaluation survey results will provide further information on the archaeological character and significance of the remains within Area F. The current information indicates that the remains may be of archaeological interest, although this is not anticipated to be of the highest level.

- 5.54. The requirement for any additional trenches, used as part of a contingency, will be discussed and agreed if required following the initial results of the evaluation, with GCC Archaeology Service and Historic England.
- 5.55. The results of the evaluation will, along with the current information base, inform conditions for pre-commencement or construction phase mitigation measures.
- 5.56. Area F is not annotated on the elements of Winchcombe parish recorded on the tithe map survey, including the 'Map of Lands in the Parish of Sudely Manor with parts of the Hamlets of Abbey-Demenses and Langley Sudely Tenements and Coates in the Parish of Winchcomb in the County of Gloucester' of 1848. The Phase 1 research identified that the central north-south boundary of Area F is included on early maps, and may therefore comprise an 'important' hedgerow under the criteria for archaeology and history in the 1997 Hedgerows Regulations.
- 5.57. The Grade II listed 18th-century gates, gate piers and railings at the entrance to the drive of Postlip Hall lie c. 460m to the north-west of Area F. The listed buildings at Postlip Hall itself include the Grade I listed mainly 17th-century country house, and the Grade II listed coach house, stables, shelter and gate piers and walls near the house. This group of buildings lies from c. 870m to the west of Area F.
- 5.58. The land within Area F, including the site of the CSEC compound, does not specifically contribute to the architectural or historical special interest of the listed buildings at Postlip Hall. On the western side of Area F there is a thick belt of woodland, with the buildings of the paper mill on the northern side adjacent to the River Isbourne, and thus there is very little inter-visibility to and from the listed buildings. The CSEC compound is situated c. 850m south-west of the closest element of the Winchcombe Conservation Area, and again there is significant mature tree cover between the two. The closest part of Area F to the Conservation Area is 350m to its south-west, which comprises the required connection route to the CSEC compound. In the short term, there is likely to be works traffic carrying out the necessary works at this route connection. This use may potentially be seen and heard from the Conservation Area, but this short-term effect would not be considered likely to adversely affect the architectural or historical special interest of the designated area. No long-term effects are identified, although it is noted that the wider Cotswold VIP scheme will remove existing pylons and overhead lines from the landscape south and south-east of Winchcombe.

- 5.59. As noted above, Upper Mill (Fig. 7, 31) is a former medieval corn mill and an 18th-century paper mill, which lies c. 100m north-west of Area F, situated on the River Isbourne. Middle Mill, which lies to the north of Area F, was also a paper mill and may have been in existence by around 1728. Neither buildings are listed. There is not a current Tewkesbury list of buildings of local importance ('locally listed buildings'). Upper Mill and Middle Mill could likely be considered of equivalent value to 'non-designated heritage assets', as they have a degree of heritage interest. The older built elements are within a wider complex of later buildings which developed in the 20th century. The situation of the buildings on the river means that they are set at the base of the river valley, at a notably lower height than the CSEC compound field, with mature tree cover between.
- 5.60. The CSEC compound is on the western side of Area G, which is on lower land on the immediate south side of the river. There are mature trees on the south side of Upper Mill, although there are less trees in the location immediately adjacent to the Area. During the short-term, there will be temporary works traffic and construction for the CSEC compound, and its access, which is likely to be observable from the south side of the mill buildings. Given the temporary nature of this work, it is not anticipated to affect the historical interest of the mill complex. Although the CSEC compound is in relative proximity to the site of the older mill buildings, given the notable number of later buildings, the low topographic situation of the buildings, and the mature tree cover there is very limited intervisibility between the two. The more recent 20th-century structures of the paper mill are observed as one follows the footpath leading southeast from the mills towards Corndean, up the side of the escarpment, but there is little experience or intelligibility of the older structures. The CSEC compound will be seen in the foreground from these views. In the long-term the construction of the CSEC compound will slightly alter the wider evolved southern setting of Upper Mill, and can be considered to represent a minor adverse non-physical effect to a non-designated heritage asset. If the wider Cotswold VIP scheme is considered, the removal of the existing pylons and overhead lines to the south of Upper Mill would comprise a heritage benefit, which would likely balance against the minor adverse effect of the compound.

Planning Application Area G

5.61. Area G lies on the B4632, which runs west from Winchcombe to Cleeve Hill. It lies to the east of a Grade II listed pair of 18th-century gates at the entrance to the drive to



- Postlip Hall (Fig. 8). The majority of this area comprises the main road, as well as the verge and hedged field boundaries.
- 5.62. Area G is c. 1ha in size. Three 30m x 1.8m evaluation trenches are proposed to test the northern and eastern sides of the field (the southern side of this Area; which comprised high ferrous responses in the geophysical survey).
- 5.63. Area G is not annotated on the elements of Winchcombe parish recorded on the tithe map survey, including the 'Map of Lands in the Parish of Sudely Manor with parts of the Hamlets of Abbey-Demenses and Langley Sudely Tenements and Coates in the Parish of Winchcomb in the County of Gloucester' of 1848. The Phase 1 research identified that the short stretch of hedgeline on the central-southern side of the Area is included on early maps, and may therefore comprise an 'important' hedgerow under the criteria for archaeology and history in the 1997 Hedgerows Regulations.
- 5.64. No ridge and furrow earthworks are observable in Area G on LiDAR imagery. Below-ground traces of likely furrows were identified in the geophysical survey on the southern edge of Area G and the field continuing to the south. As these are not intelligible above ground, the below-ground remnants are not of sufficient archaeological interest to comprise a 'heritage asset'. Area G forms part of historic landscape characterisation type A4, which is less organised enclosure partly reflecting former unenclosed cultivation patterns. This type does not comprise a 'heritage asset' in and of itself.
- 5.65. Area G lies c. 50m to the east of the Grade II listed 18th-century gate piers at the entrance to the drive for Postlip Hall. The gate piers have a specific road-side setting, as well as framing the entrance to the key carriage-drive approach to the house and grounds. Works within Area G, which will be in the short term and temporary, are not anticipated to adversely effect the architectural or historical special interest of the gate piers.

6. CONCLUSIONS

- 6.1. The present Archaeological Statement and its appendix are informed by desk-based archaeological research and geophysical survey, which has been carried out in ongoing consultation with GCC Archaeology Service and Historic England. This work has provided a good level of information on the likely character and significance of archaeological remains within the planning application areas.
- 6.2. In order to fully inform determination of the planning application, however, archaeological evaluation trenching is proposed within these areas (excluding areas of road and trees). A summary of the proposed evaluation approach is provided in Chapter 5 above, and is detailed in the Evaluation WSI comprising Appendix 1.
- 6.3. The requirement for any additional trenches, used as part of a contingency during this determination-period evaluation trenching, will be discussed and agreed if required following the initial results of the evaluation, with GCC Archaeology Service and Historic England.
- 6.4. The results of the evaluation will, along with the current information base, inform conditions for pre-commencement or construction phase mitigation measures.

'Important' hedgerows and the historic landscape

- 6.5. Hedgerows which qualify as 'important' hedgerows under the 1997 Hedgerows Regulations are not 'designated heritage assets'. The hedgerows identified on the boundaries of the Areas considered in this report are largely associated with post-medieval planned or informal field enclosure, and are not of sufficient archaeological interest in and of themselves to comprise 'non-designated heritage assets'. The 1997 Hedgerows regulations require approval from the LPA prior to removal of 'important' hedgerows.
- 6.6. No parts of Areas A-G comprise historic landscape character types of a level of historic interest to comprise 'non-designated heritage assets'.

Non-physical effects: the 'setting' of heritage assets

6.7. This Archaeological Statement has considered any contribution that the areas which are subject of the planning applications make to the 'setting' and heritage significance of heritage assets in the wider environs, and any effects upon this significance from the proposals. No adverse effects upon the heritage significance of any designated

heritage assets from the planning application proposals have been identified. It has been noted that the wider Cotswold VIP scheme will likely lead to heritage benefits to various designated heritage assets along that route due to the removal of existing pylons and overhead lines.

- 6.8. A single minor adverse effect upon the significance of a heritage asset which may be considered a 'non-designated heritage asset' (Upper Mill paper mill) has been identified, from the construction of the CSEC compound south-east of the mill (given the later development of buildings at the mill site, their low topographic situation, and the surrounding mature trees, this effect is no more than very limited). Upper Mill is not a listed building, and there is not a current Tewkesbury list of buildings of 'local importance'. If the wider Cotswold VIP scheme is considered, the removal of the existing pylons and overhead lines to the south of Upper Mill would comprise a heritage benefit, which would likely balance against the minor adverse effect of the compound.
- 6.9. This report specifically addresses the areas of the Cotswold VIP scheme which require planning permission. However, it is noted that the overall Cotswold VIP scheme will lead to notable heritage benefits to a number of heritage assets in the area, due to the removal of the current pylons and overhead power cables.

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SUMO Survey 2023 Geophysical Survey report: National Grid, Cotswold VIP Project. DRAFT REPORT

APPENDIX 1: EVALUATION TRENCH WSI





Cotswolds Visual Impact Provision Project Gloucestershire

Written Scheme of Investigation for an Archaeological Evaluation



for: National Grid

CA Project: CR1378

June 2024



Cotswolds Visual Impact Provision Project Gloucestershire

Written Scheme of Investigation for an Archaeological Evaluation

CA Project: CR1378

Document Control Grid									
Revision	Date	Author	Checked by	Status	Reasons for revision	Approved by			
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В	12 June 2024	Alex Thomson	Richard Morton	Draft	Client comments	Richard Morton			

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1. INTRODUCTION

- 1.1. This document is a Written Scheme of Investigation (WSI) by Cotswold Archaeology (CA) for an archaeological evaluation of areas subject of planning applications of the Cotswolds Visual Impact Provision Project (the 'Cotswolds VIP Project'), Gloucestershire (centred at NGR: 399865 221401; Fig. 1). This WSI has been prepared for National Grid.
- 1.2. This WSI addresses areas of the Cotswolds VIP Project which are the subject of the planning applications only. The wider Cotswolds VIP Project will see a section of 400kV overhead electricity transmission lines transferred underground to mitigate the visual impact of existing electricity infrastructure through part of the Cotswolds National Landscape. Separate applications for Areas A-G, largely comprising proposals for facilities at either end of the route, will be submitted to Cotswold District Council (CDC; Areas A-D) and Tewkesbury Borough Council (TBC; Areas E-G). The majority of the undergrounding route and the associated works comprises Permitted Development and are not addressed by this WSI.
- 1.3. The scope of this evaluation has been defined by CA, following ongoing consultation with Gloucestershire County Council Archaeology Service (GCCAS), the archaeological advisors to TBC and CDC, and Historic England (HE). This WSI will be submitted to GCCAS and HE for review.
- 1.4. This WSI has been guided in its composition by:
 - Standard for archaeological field evaluation (ClfA 2023);
 - Universal guidance for archaeological field evaluation (ClfA 2023);
 - Management of Research Projects in the Historic Environment (MoRPHE)
 PPN 3: Archaeological Excavation (Historic England 2015); and
 - Management of Research Projects in the Historic Environment: The MoRPHE Project Managers' Guide (Historic England 2015).

The site

- 1.5. The Cotswolds VIP Project includes an approximately 7.5km long corridor, broadly running north/south from Winchcombe to Whittington, and generally comprises agricultural fields with areas of woodland.
- 1.6. The areas covered by this WSI (A-G) are located along the route of the proposed undergrounding corridor, as below:
 - Area A (centred at NGR: 399228 220979; Fig. 2) comprises an area measuring c. 1.9ha within part of a pasture field, located to the south of Ham Road. The area lies at approximately 241m AOD and is broadly level;
 - Area B (centred at NGR: 401007 220556) comprises parts of the A40 highway and a wooded area. Evaluation trenching could not be practically achieved in this area, and it is not included in this scope of work;
 - Area C (centred at NGR: 399340 221848; Fig. 3) comprises an area measuring c. 0.1ha within two agricultural fields either side of a minor road. The area lies at approximately 264m AOD and is broadly level;
 - Area D (centred at NGR: 399453 222520; Fig. 4) comprises an area measuring c. 0.1ha within two agricultural fields either side of a Puckham Scrubs Road. The area lies at approximately 282m AOD and is broadly level;
 - Area E (centred at NGR: 401294 226167;) comprises areas of woodland either side of a minor road. Evaluation trenching could not be practically achieved in this area, and it is not included in this scope of work;
 - Area F (centred at NGR: 401110 227037; Fig. 5) comprises an area measuring c. 3.5ha within parts of three agricultural fields to the south of the River Isbourne and adjacent premises at Postlip. The area lies at approximately 130m AOD and is broadly level;
 - Area G (centred at NGR: 400756 227401; Fig. 5) comprises an area measuring c. 1ha including and to the south of Cheltenham Road (B4632).
 The area lies at approximately 193m AOD and is broadly level;
- 1.7. The underlying bedrock geology of the route is variably mapped as limestone of the Birdlip Formation, siltstone and mudstone of the Dyram Formation, and mudstone of the Whitby Formation, all formed during the Jurassic Period (BGS 2024).

2. ARCHAEOLOGICAL BACKGROUND

2.1. The site has previously been subject to Archaeological Desk-Based Assessment and geophysical survey, the results of which are set out in the Archaeological Statement to which this WSI forms Appendix 1. It is not intended to fully reprise these reports here, but the following is a summary of their conclusions.

Overview

- 2.2. Evidence of prehistoric activity has been identified in the vicinity of the scheme, including two Scheduled bowl barrows and earthworks suggestive of further barrows (including earthworks of two round barrows located within Arle Grove). Cropmarks of a prehistoric or Roman field system are recorded in the area and evidence of Iron Age activity is known in the form of a possible Iron Age hillfort, Arle Grove Camp, located to the north-west of the scheme.
- 2.3. Roman activity is also recorded in the area. This includes a possible Roman villa known as Waltham Roman Villa, identified in 1978 when evidence of dressed stone, mortar, and roof tiles were identified (Cox 1979). The complex was interpreted as a possible villa with two or three phases of redevelopment (1st to 4th or early 5th century AD). Further evidence of Roman activity has also been identified in the immediate vicinity of the scheme, including two further villas: Whittington Roman Villa, and a likely Roman villa at Arle Grove.
- 2.4. Features of medieval date are limited, with boundary earthworks at Arle Grove and a Saxon boundary point located *c*. 950m south-east of the southernmost part of the scheme, near Lineover Wood, the only known sites.
- 2.5. Extensive evidence of post-medieval activity is known from the area. This includes Listed Buildings, extant ridge and furrow cultivation earthworks, and earthworks of post-medieval quarries and ponds.

Geophysical Survey

2.6. A gradiometer survey was undertaken along the route of the proposed scheme, covering *c.* 167.5ha (MS 2024). Archaeological activity was identified mostly within the south of the survey area in the form of three foci of activity. The first focus included a large sub-square enclosure containing dense concentrations of overlapping anomalies suggestive of multiphase activity and likely corresponding to a previously recorded Roman villa; a possible Romano-Celtic temple, and a possible round

barrow. A second focus of archaeological activity includes a complex of enclosures of likely Iron Age date, alongside a series of possible boundaries and/or routeways; while the third focus comprises a large sub-elliptical enclosure of uncertain date. Ridge and furrow cultivation and former mapped/unmapped field boundaries were identified, and modern agricultural activity was recorded as drains and ploughing trends. Natural variations were recorded and are likely attributed to transportation of sediments downslope, and to the dissolution of the limestone bedrock, infilled with contrasting sediment. Anomalies of an undetermined origin were also detected. Modern interference was limited to extant field boundaries, services and overhead cables.

Area A (Fig. 2)

- 2.7. Neolithic to Bronze Age worked flints have previously been found in the field to the west of Area A, and Area A lies 600m to the south of a Scheduled Monument bowl barrow (north-west of Wood Farm; Historic England Ref: 1017336); the barrow is located on the edge of the escarpment (at a height of between 250m-255m aOD) with extensive views across the lower lands to the west and south. A Roman settlement site was discovered during clearing of 'Whittington Wood' (now known as 'Arle Grove'), to the north of Whittington. The earthwork remains of a 19th-century quarry are visible on the northern side of Ham Road bordering this Area, which was further delineated by the geophysical survey.
- 2.8. The geophysical survey identified several closely spaced linear trends adjacent to and within the Area, identified as 'possible archaeology'. The closely spaced and straight nature of these is in fact suggestive of more recent activity such as postmedieval drainage or ridge and furrow cultivation evidence.
- 2.9. The northern and eastern boundaries of Area A are illustrated on the 'Plan of the Parish of Whittington in the County of Gloucester' of 1838 and have remained relatively unchanged since the early 19th century.

Area C (Fig. 3)

2.10. The Scheduled barrow north-west of Wood Farm lies around 320m to the south-west of Area C, and two further bowl barrows of the same broad period are situated in Arle Grove, *c.* 180m to the south-east.

2.11. A long linear feature was identified as 'possible archaeology' in the geophysical survey to the north of this Area, plus several weaker linear anomalies, although no anomalies indicative of archaeological remains were identified within the Area itself.

Area D (Fig. 4)

2.12. Area D lies 450m to the south of a Scheduled Bronze Age bowl barrow (south-east of Piccadily Farm). A post-medieval quarry is visible as an earthwork immediately to the north of the Area, within an uncultivated part of the arable field to the north of the road. No magnetic anomalies of archaeological remains were identified within Area D itself in the geophysical survey.

Area F and G (Fig. 5)

- 2.13. Area F lies c. 400m north of a potential prehistoric enclosure identified in the geophysical survey, and a further possible enclosure, defined by three sides, was identified by the survey c. 200m to the south. Area F lies south of Middle Mill paper mill in the hamlet of Coates, located on the north side of the River Isbourne, which was probably in existence by the early 18th century.
- 2.14. The geophysical survey also identified several linear magnetic anomalies in the western part of Area F which may represent a further enclosure, possibly a premedieval field enclosure associated with the other nearby enclosures discussed above. Area G contained high ferrous responses in the geophysical survey.
- 2.15. Area F is not annotated on the elements of Winchcombe parish recorded on the tithe map survey, including the 'Map of Lands in the Parish of Sudely Manor with parts of the Hamlets of Abbey-Demenses and Langley Sudely Tenements and Coates in the Parish of Winchcomb in the County of Gloucester' of 1848. Desk-based research identified that the central north/south boundary of Area F is included on early maps.
- 2.16. The Upper Mill is a former medieval corn mill and an 18th-century paper mill, which lies c. 100m north-west of Area F, situated on the River Isbourne. Middle Mill, which lies to the north of Area F, was also a paper mill and may have been in existence by around 1728.

3. AIMS AND OBJECTIVES

- 3.1. The general objective of the evaluation is to provide further information on the likely archaeological resource within the site, including its presence/absence, character, extent, date and state of preservation. This information will enable GCCAS and HE to identify and assess the particular significance of any archaeological heritage assets within the site, consider the impact of the proposed development upon that significance and, if appropriate, develop strategies to avoid or minimise conflict between heritage asset conservation and the development proposal, in line with the *National Planning Policy Framework* (Department for Levelling Up, Housing and Communities 2023).
- 3.2. A further objective of the project is to compile a stable, ordered, accessible project archive (see Section 5).
- 3.3. If significant archaeological remains are identified, the evaluation report will make reference to the South-West Archaeological Research Framework (SWARF; Grove & Croft 2012) so that the remains can, if possible, be placed within their local and regional contexts. The specific objectives of the evaluation are outlined below, some of which relate to specific Research Aims (RA) with the SWARF and are informed by the Archaeological Background outlined above. These objectives are:
 - To investigate the potential features recorded by the geophysical survey (Magnitude 2024) and to investigate blank areas to ensure that currently unknown archaeological features not susceptible to magnetometer survey are discovered and evaluated in advance of construction. Specific geophysical anomalies to be targeted include:
 - Linear anomalies of 'possible' archaeological origin in Area A;
 - Linear anomalies in Area F, possibly representing an enclosure;
 - Magnetic interference in Area G, which may be masking underlying features;
 - To investigate Bronze Age and Iron Age activity in the area of scheme, as evidenced by nearby barrows and likely Iron Age settlement north-west of Area B, including detailed assessment of material cultural remains (where identified), relating to RA14 "Widen our understanding of Later Bronze Age and Iron Age material culture"; assessment of Bronze Age and Iron Age agricultural development via RA21a "Development of field systems and

- intensification of agriculture in the Bronze and Iron Ages" and RA40 : "Improve understanding of agricultural intensification and diversification in later prehistory"; and identification and assessment of funerary monuments and settlement activity, such as related to the known Bronze Age barrows and Iron Age settlement north-west of Area B;
- To investigate and characterise Roman settlement activity suggested within the vicinity of the evaluation area as identified by geophysical survey and previous nearby works (at Waltham Villa, for example). This relates to RA29 – "Improve understanding of non-Villa Roman rural settlement" (for elements not relating to Waltham Villa itself) – and RA41 – "Assess the impact of the Roman Empire on farming";
- To identify, investigate and characterise any Roman funerary activity related to potential areas of settlement in the site's vicinity. This relates to RA58 (55)
 "Widen our understanding of Roman burial traditions";
- To investigate evidence of any post-Roman or early medieval activity within the scheme, related to RA26 – "Post-Roman to early medieval landscape changes" – and RA30 – "Develop and test methodologies to identify early medieval rural settlement";
- To investigate and characterise environmental potential within features of all dates to inform further environmental sampling strategies for any future mitigation work. This will include:
 - Assessment of suitability for features of all dates to be subject to radiocarbon dating (relating to RAs16c, d, f and h – "Scientific dating in development control projects");
 - Assessment of how future environmental sampling strategies can improve standards and techniques of environmental data recovery, especially for key periods, relating to RA17 "Improving standards and techniques of environmental data" and RA18a "High resolution environmental analysis and dating for key periods";
 - Analysis and assessment of colluvial and alluvial sequences in an archaeological context, relating to RA18d – "Analysis of colluvial and alluvial sequences".

4. METHODOLOGY

- 4.1. The evaluation will comprise the excavation of a total of 24 trenches (locations shown on the attached plans; Figs. 2-5). Trenches by area include:
 - Area A: 3no. 50m x 1.8m trenches and 3no. 30m x 1.8m trenches;
 - Area C: 2no. 15m x 1.8m trenches;
 - Area D: 2no. 15m x 1.8m trenches;
 - Area F: 5no. 50m x 1.8m trenches and 6no. 30m x 1.8m trenches; and
 - Area G: 3no. 30m x 1.8m trenches.
- 4.2. In all areas, the trenches have been located to test geophysical anomalies and to provide a representative sample of the remainder of the site. All areas are proposed to be subject to at least a 2% sample.
- 4.3. A further 2% contingency allowance has been made to be utilised if additional information is required to successfully characterise and assess the value of the archaeological remains. It is also possible that further evaluation may be required at a later date to further examine and understand features exposed in this phase of evaluation.
- 4.4. Trenches will be set out on OS National Grid co-ordinates using Leica GPS. They will be scanned for live services by trained CA staff using CAT and genny equipment, in accordance with the CA Safe System of Work for avoiding underground services. The positions of the trenches may be adjusted on site to account for services or other constraints, with the approval of GCCAS.
- 4.5. Overburden will be stripped from the trenches by a mechanical excavator fitted with a toothless grading bucket. All machining will be conducted under archaeological supervision and will cease when the first significant archaeological horizon or natural substrate is revealed (whichever is encountered first). Topsoil and subsoil will be stored separately adjacent to each trench.
- 4.6. Following machining, any archaeological features present will be investigated, planned and recorded in accordance with *CA Technical Manual 1: Fieldwork Recording Manual*. Each context will be recorded by written and measured description. Records will be entered directly into the CA Digital Recording System (DRS) and/or onto pro-forma site recording sheets. Hand-drawn sections of

excavated archaeological features will be prepared (scale 1:10 or 1:20, as appropriate). Features/deposits will be recorded in plan using Leica GPS or Total Station (as appropriate), in accordance with *CA Technical Manual 4: Survey Manual*. Photographs (digital colour) will be taken as appropriate.

- 4.7. Metal detecting of the excavated topsoil/subsoil, and the surface of the exposed features, will be undertaken in order to identify metal finds.
- 4.8. Sample excavation of archaeological deposits will be sufficient to achieve the aims and objectives identified in Section 3 (above). At the evaluation stage, there is no requirement to sample all archaeological features encountered. Excavation (where undertaken) will not compromise the integrity of the archaeological record and will be carried out in such a way as to allow for the subsequent protection of remains, either for conservation or to allow more detailed investigations to be conducted at a later date.
- 4.9. Upon completion of the evaluation, all trenches will be backfilled by a mechanical excavator under archaeological supervision. Highly significant deposits will be covered with protective material prior to backfilling.

Artefacts

4.10. Artefacts will be recovered and retained for processing and analysis in accordance with CA Technical Manual 3: Treatment of Finds Immediately after Excavation. Artefacts will be collected and bagged by context. Artefacts from topsoil, subsoil and unstratified contexts will normally be noted but not retained unless they are of intrinsic interest. All artefacts from stratified excavated contexts will be collected, except for large assemblages of post-medieval or modern material. Such material may be noted and not retained or, if appropriate, a representative sample may be collected and retained.

Environmental remains

4.11. The selection, collection and processing of environmental samples will follow the guidelines outlined in *Environmental Archaeology: A guide to the Theory and Practice of Methods, from Sampling and Recovery to Post-excavation* (English Heritage 2011) and CA Technical Manual 2: The Taking and Processing of Environmental and Other Samples from Archaeological Sites.

- 4.12. Due care will be taken to identify deposits which may have environmental potential and, where appropriate, a programme of environmental sampling will be initiated. The sampling strategy will be adapted for the specific circumstances of the site, in close consultation with the CA Environmental Officer, GCCAS and HE's Science Advisor, but will follow the general selection parameters set out in the following paragraphs. It will also be reviewed and revised if this is required in order to meet original or revised research aims or to accommodate unavoidable logistical constraints. Site visits by the CA Environmental Officer, GCCAS and HE's Science Advisor, or other specialists, may be required to tailor the environmental sampling strategy during the course of the fieldwork.
- 4.13. The appraisal of nearby archaeological sites to the scheme (as outlined in Section 2 above) suggests that there is potential to encounter Neolithic, Bronze Age, Iron Age, Roman, early medieval, medieval and post-medieval features and deposits within the proposed evaluation trenches. Secure, phased deposits, especially those related to settlement activity, structures and/or funerary activity, will be considered for sampling for the recovery of charred plant remains, charcoal and mineralised remains. Samples should be taken to inform the Aims and Objectives outlined in Section 3 above, namely to assess the quality of environmental assemblages from features of all periods in order to inform future strategies for environmental sampling and analysis, and to further the characterisation of features and surrounding activities.
- 4.14. This would provide an opportunity to assess the preservation and potential of the environmental remains from the different phases of activity within the scheme. These results may also hint at the status of the different sites within the wider scheme and the activities taking place in the immediate vicinity for each of these areas. Furthermore, these would assist in determining a targeted environmental sampling strategy if further work was deemed appropriate on the site as a result of this evaluation work.
- 4.15. The preservation, in terms of both quantity and quality, of the environmental remains to be potentially recovered from the site is currently unknown. It is anticipated that the richest assemblages will be those from settlement-related features of all dates (such as ditch and pit fills), whilst those from peripheral agricultural activities may be poorer. A sample size of 20 litres from richer deposits is suggested and 40-60 litres from Roman and any earlier deposits would be appropriate for this site.

- 4.16. Any cremation-related deposits (where excavated; see *Human remains*, below) will be sampled appropriately for the recovery of cremated human bone and charred remains. If any evidence of *in situ* metal working is found, suitable samples will be taken for the recovery of slag and hammerscale. Neolithic and Bronze Age flint works has been recovered in the vicinity of the scheme (see *Archaeological Background*, above) and should deposits of flint debitage, etc. be recovered a suitable sampling strategy will be devised in consultation with the relevant specialist and HE prior to the evaluation of these deposits.
- 4.17. The need for more specialist samples (such as OSL, archaeomagnetic dating and dendrochronology) will be evaluated on site. If required, any such samples will be taken in consultation with the relevant specialists, although the requirement for these is not anticipated. The requirement for radiocarbon dating will be considered while on site but it is not anticipated that there would need for many, if any, dates at the evaluation stage of work, although the results of the wider environmental assessment of deposits will inform the potential for radiocarbon dating of features during any future work.
- 4.18. The identification and assessment of possible colluvial deposits from valley slopes and particularly valley bottoms will be undertaken during the evaluation, although these are unlikely to be present within Areas A-G. These deposits, if present, could be masking prehistoric archaeology and locally waterlogged deposits with archaeological and palaeoenvironmental potential that would require specialist evaluation and sampling. Should such deposits be encountered a geoarchaeological specialist will be consulted to devise a suitable sampling strategy (such as monolith sampling) in conjunction with CA's Environmental Officer, GCCAS and HE's Science Advisor, visiting site as necessary.
- 4.19. Where sealed waterlogged deposits are encountered, samples will be considered for the recovery of waterlogged remains (including insects, molluscs and pollen) and any charred remains. The taking of sequences of samples for the recovery of molluscs and/or waterlogged remains will be considered through any suitable deposits, such as deep enclosure ditches, barrow ditches, palaeochannels, or buried soils. Monolith samples may also be taken from suitable deposits as appropriate to allow soil and sediment description/interpretation, as well as sub-sampling for pollen and other micro/macrofossils such as diatoms, foraminifera and ostracods, in conjunction with

CA's Environmental Officer, GCCAS and HE's Science Advisor, visiting site as necessary.

4.20. The processing of the samples will be done in conjunction with the relevant specialist following the Historic England general environmental processing guidelines (English Heritage 2011). Flotation or wet sieve samples will be processed to 0.25mm. The residues are routinely bucket floated once removed from the flotation tank to ensure that the environmental material has floated. All of the bulk sediment samples taken for flotation will be floated. Additionally, if any residues are found to still contain ecofacts once dry due to the nature of the sediments, these are then refloated. Other specialist samples, such as those for pollen, will be prepared by the relevant specialists.

Treasure

4.21. Upon discovery of treasure, CA will notify National Grid, GGCAS and HE immediately. CA will comply fully with the provisions of the Treasure Act 1996 and the Code of Practice referred to therein. CA will also comply with the Treasure (Designation) (Amendment) Order 2023. Findings will be reported to the Coroner within 14 days.

Human remains

- 4.22. Any human remains (skeletal or cremated) will be treated with due decency and respect at all times.
- 4.23. Small slots will be hand-excavated across any suspected burial features (inhumations or cremated bone deposits) in order to confirm the presence and condition of any human bone. Once confirmed as human, the buried remains will not normally be disturbed through any further investigation at the evaluation stage, and will be left in situ where possible.
- 4.24. Where further disturbance is unavoidable, or where full exhumation of the remains is deemed necessary, exhumation will be conducted following the provisions of the Coroner's Unit in the Ministry of Justice. All excavation of human remains and associated post-excavation processes will be in accordance with the standards set out in Updated Guidelines to the Standards for Recording Human Remains (CIfA 2017), The Role of the Human Osteologist in an Archaeological Fieldwork Project (Historic England 2018) and Guidance for Best Practice for the Treatment of Human

Remains Excavated from Christian Burial Grounds in England (Advisory Panel on the Archaeology of Burials in England 2017).

5. POST-EXCAVATION, REPORTING AND ARCHIVING

Reporting

- 5.1. An illustrated typescript report will be compiled on the evaluation results. This report will include:
 - an abstract preceding the main body of the report, containing the essential elements of the results:
 - a summary of the project's background;
 - a description and illustration of the site location;
 - a methodology of the works undertaken;
 - integration of, or cross-reference to, appropriate cartographic and documentary evidence and the results of other research undertaken, where relevant to the interpretation of the evaluation results;
 - a description of the evaluation results;
 - an interpretation of the evaluation results, including a consideration of the results within their wider local/regional context;
 - a site location plan at an appropriate scale on an Ordnance Survey (or equivalent) base-map;
 - a plan showing the locations of the trenches in relation to the site boundaries;
 - plans of each trench, or part of trench, in which archaeological features were recorded. These plans will be at an appropriate scale to allow the nature of the features to be shown and understood. Plans will show the orientation of trenches in relation to north. Section drawing locations will also be shown on these plans. Archaeologically sterile areas will not normally be illustrated;
 - appropriate section drawings of trenches and archaeological features. These
 drawings will include OD heights and will be at scales appropriate to the
 stratigraphic detail being represented. Drawings will show orientation in
 relation to north/south/east/west;
 - photographs showing significant archaeological features and deposits that are referred to in the text. All photographs will contain appropriate scales, the size of which will be noted in the photograph captions;
 - summary tables of the recorded contexts and recovered artefacts;

- a summary of the contents of the project archive and details of its location;
- specialist assessment or analysis reports (where undertaken). Specialist artefact and palaeoenvironmental assessments will take into account the wider local/regional contexts and will include:
 - o specialist aims and objectives;
 - processing methodologies (where relevant);
 - any known biases in recovery, or problems of contamination/residuality;
 - quantities of material; types of material present; distribution of material;
 - for environmental material, a statement on abundance, diversity and preservation;
 - a summary and discussion of the results, to include significance in a local and regional context.
- 5.2. The draft evaluation report will be distributed to National Grid, GCCAS and HE for review prior to finalisation. All copies of the report (draft and final) will be issued in pdf format. A copy of the final report will be issued to the Gloucestershire HER along with any shapefiles for the areas investigated, if required.

Academic and public dissemination

- 5.3. It is anticipated that a short note on the evaluation results will be produced for inclusion within an appropriate local archaeological journal.
- 5.4. Subject to any contractual constraints, a summary of information from the project will be entered onto the OASIS online database of archaeological projects in Britain. This will include a digital (pdf) copy of the final report, which will also appear on the Archaeology Data Service (ADS) website once the OASIS record has been verified.
- 5.5. A digital (pdf) copy of the final report will also be made available for public viewing via CA's *Archaeological Reports Online* web page (http://reports.cotswoldarchaeology.co.uk).

Archive deposition

5.6. An ordered, indexed, and internally consistent site archive will be prepared in accordance with the relevant recipient museum guidelines. The archive will also be prepared in accordance with:

- Gloucestershire Archaeological Archive Standards (GCC 2018);
- Standard and guidance for the creation, compilation, transfer and deposition of archaeological archives (ClfA 2014; updated October 2020);
- Archaeological Archives: A Guide to Best Practice in Creation, Compilation,
 Transfer and Curation (Archaeological Archives Forum 2011);
- Standard and Guide to Best Practice for Archaeological Archiving in Europe:
 EAC Guidelines 1 (Europae Archaeologia Consilium 2019); and
- Toolkit for Selecting Archaeological Archives (ClfA/Historic England 2019; updated March 2022).
- 5.7. All artefacts and environmental samples will be processed, assessed, conserved and packaged in accordance with CA technical manuals and Corinium Museum guidelines.
- 5.8. Depending on the nature and scope of any subsequent programme of archaeological works at the site (if required), the evaluation archive may be combined with that for any subsequent works and deposited as a single archive. Confirmation of this will be included in any forthcoming WSI.
- 5.9. CA will make arrangements with Corinium Museum for the deposition of the site archive and, subject to agreement with the legal landowner(s), the artefact collection.

Selection strategy

- 5.10. As noted in para. 4.10, artefacts from topsoil, subsoil and unstratified contexts will normally be noted but not retained unless they are of intrinsic interest. All artefacts from stratified excavated contexts will be collected, except for large assemblages of post-medieval or modern material. Such material may be noted and not retained or, if appropriate, a representative sample may be collected and retained.
- 5.11. The site-selected material archive returned to the CA offices will be reviewed following analysis. Stakeholders will make selection decisions based on CA Finds Manager/Officer reports and selection recommendations. The selection will take place during archive compilation. After discussion with the relevant museum Curator and the CA Finds Managers/Officers, it is possible that no material post-dating AD 1800 will be retained for inclusion in the preserved archive.

Digital archive

5.12. A digital archive will be deposited with the Archaeology Data Service (ADS). This archive will be compiled in accordance with the *ADS Guidelines for Depositors*.

Data management

- 5.13. All born-digital and digitally-transferred project data created during fieldwork and post-excavation (other than duplicated files) will be stored by CA. Upon project completion and deposition, the data will be transferred to a secure external server. Data will be selected for inclusion in the final digital archive, as detailed below. It is proposed that data selection will occur following completion of post-excavation work.
- 5.14. Selected digital files will be transferred to Corinium Museum with the documentary and material archive and to the ADS, in line with the relevant guidance and standards for both organisations. In adherence to CA's *Guidelines for essential archive tasks and the preparation of archives*, it is proposed that the selected files will include final versions only. Digital photographs will be selected for inclusion in the archive in line with CA's *Guidelines for essential archive tasks and the preparation of archives* and *Digital Image Capture and File Storage: Guidelines for Best Practice* (Historic England 2015). Data produced by external specialists or sub-contractors will be granted under license to CA to allow inclusion in the digital archive as required.

6. PROGRAMME

- 6.1. It is anticipated that the project fieldwork will require three to four weeks. It is anticipated that fieldwork will need to be undertaken in phases to account for varying availability of access to each parcel of land. Therefore, it is not envisaged that all trenches will be excavated concurrently/consecutively.
- 6.2. It is anticipated that the draft report will be issued within six weeks of the completion of archaeological fieldwork.

7. PROJECT STAFF

7.1. This project will be under the management of Richard Young, MCIfA, Project Manager, CA. The Project Manager will direct the overall conduct of the evaluation during the period of fieldwork. Day-to-day responsibility will, however, rest with the Project Leader, who will be on-site throughout the project.

- 7.2. The field team will consist of a maximum of eight staff (e.g., one Project Officer, one Project Supervisor and six Archaeologists).
- 7.3. Specialists who may be invited to advise and report on specific aspects of the project as necessary are:
 - Ceramics: Ed McSloy BA (Hons) MCIfA (CA), Grace Jones BA MA PhD MCIfA (CA), Alejandra Gutierrez BA (Hons) PhD MCIfA (CA), Stephen Benfield BA (CA), Jacky Sommerville BSc MA PCIfA (CA), Peter Banks LLB LLM PCIfA (CA) and Alistair Barclay BSc PhD FSA MCIfA (CA)
 - Metalwork: Ed McSloy MCIfA (CA), Grace Jones BA MA PhD MCIfA (CA)
 - Flint: Jacky Sommerville PClfA (CA) and Pippa Bradley BA MPhil Dip Post-Ex MClfA (CA)
 - Animal bone: Andy Clarke BA ACIfA (Hons) MA (CA) and Matilda Holmes
 PhD BSc MSc ACIfA (freelance)
 - Human bone: Sharon Clough BA MSc MCIfA (CA)
 - Environmental remains: Sarah Wyles MCIfA (CA)
 - Conservation: Pieta Greeves BSc MSc ACR (Drakon Heritage and Conservation)
 - Geoarchaeology: Holly Rogers BA (Hons) MSc (CA), Keith Wilkinson PhD (ARCA)
 - **Building recording:** Peter Davenport MClfA FSA (freelance)
- 7.4. Depending on the nature of the deposits and artefacts encountered, it may be necessary to consult other specialists not listed here. A full list of specialists currently used by CA is given as Appendix A.

8. HEALTH, SAFETY AND ENVIRONMENT

8.1. CA will conduct all works in accordance with the Health and Safety at Work Act 1974 and all subsequent health and safety legislation, as well as the CA Health and Safety and Environmental policies and the CA Safety, Health and Environmental Management System (SHE). Any client/developer/Principal Contractor policies and/or procedures will also be followed. A site-specific Construction Phase Plan (form SHE 017) will be formulated prior to commencement of fieldwork.

9. INSURANCES

9.1. CA holds Public Liability Insurance to a limit of £15,000,000 and Professional Indemnity Insurance to a limit of £10,000,000.

10. MONITORING

10.1. Notification of the start of site works will be made to GCCAS so that there will be opportunities to visit the evaluation and check on the quality and progress of the work.

11. QUALITY ASSURANCE

- 11.1. CA is a Registered Organisation (RO) with the Chartered Institute for Archaeologists (RO Ref. No. 8). As a RO, CA endorses the Code of Conduct (ClfA 2019) and the Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment (ClfA 2014; updated October 2020). All CA Project Managers hold Member status within the ClfA.
- 11.2. CA operates an internal quality assurance system as follows: projects are overseen by a Project Manager, who is responsible for the quality of the project. The Project Manager reports to the Chief Executive, who bears ultimate responsibility for the conduct of all CA operations. Matters of policy and corporate strategy are determined by the Board of Directors and, in cases of dispute, recourse may be made to the Chairman of the Board.

12. PUBLIC ENGAGEMENT, PARTICIPATION AND BENEFIT

12.1. It is not anticipated that this evaluation will afford opportunities for public engagement or participation during the course of the fieldwork. However, the evaluation results will be made publicly available on the ADS and CA websites, as set out in Section 5.

13. STAFF TRAINING AND CPD

13.1. CA has a fully documented mandatory performance management system for all staff. This system reviews personal performance, identifies areas for improvement, sets targets and ensures the provision of appropriate training within CA's adopted training policy. In addition, CA has developed an award-winning career development programme for its staff. This ensures a consistent and high-quality approach to the development of appropriate skills.

13.2. As part of CA's requirement for continuing professional development, all members of staff are required to maintain a personal development plan and an associated log; these are reviewed within the performance management system.

14. REFERENCES

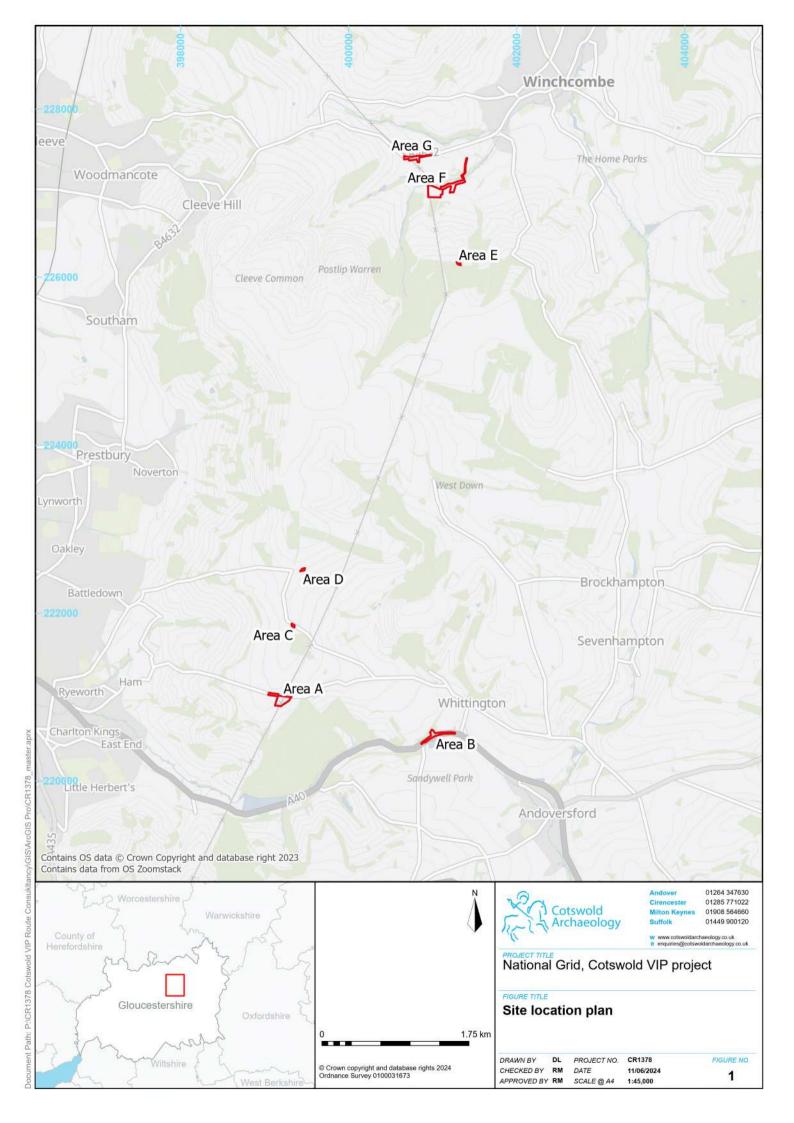
- BGS (British Geological Survey) 2024 BGS Geology Viewer https://www.bgs.ac.uk/map-viewers/bgs-geology-viewer/ Accessed 15 May 2024
- CA (Cotswold Archaeology) 2021 Cotswolds Visual Impact Provision Project,
 Gloucestershire: Phase 1 Archaeological Desk-Based Assessment, CA
 report no. CR0862_1
- CA 2024a Cotswolds Visual Impact Provision Project, Gloucestershire:

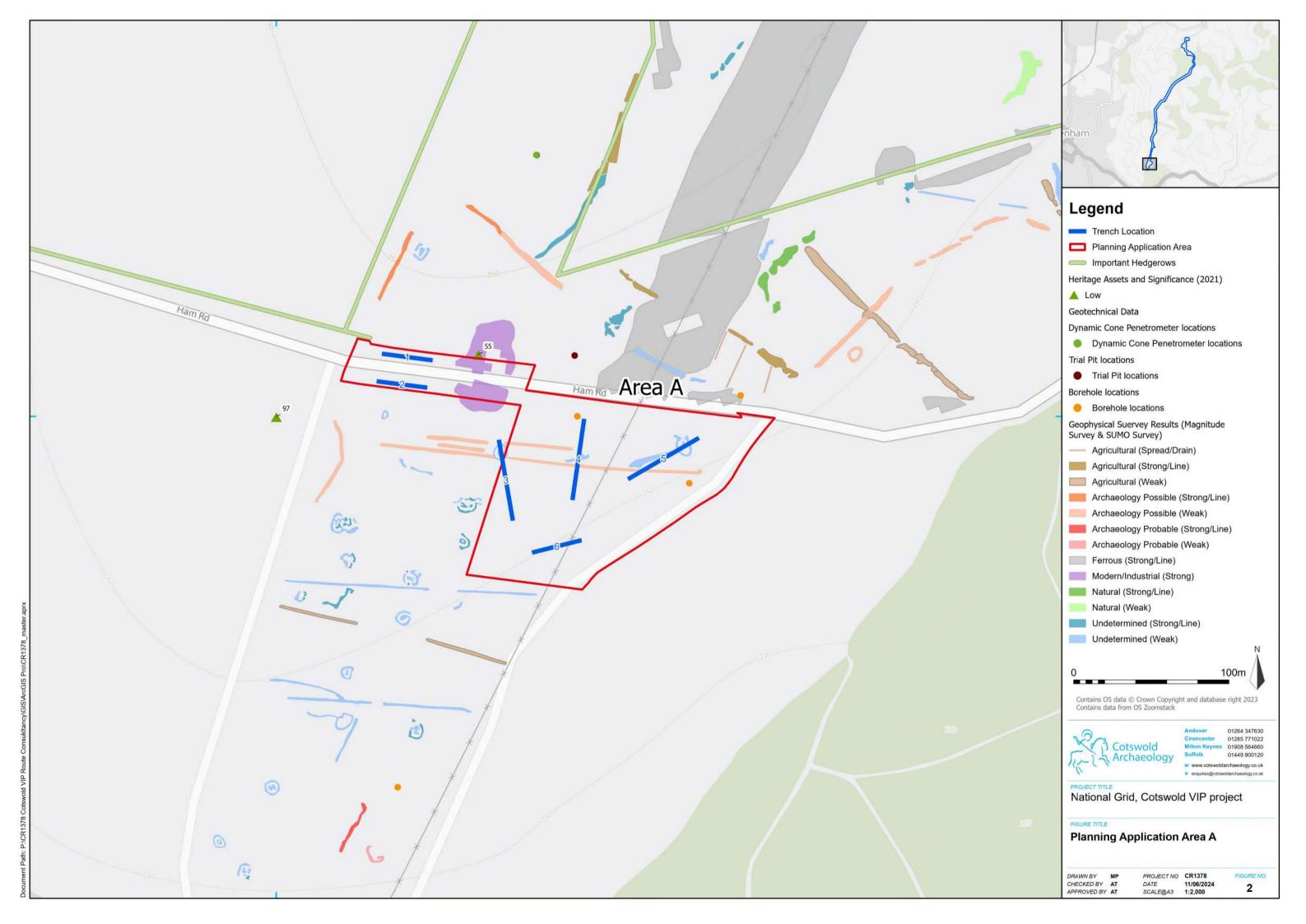
 Archaeological Management Strategy and Interim Report, CA report ref:

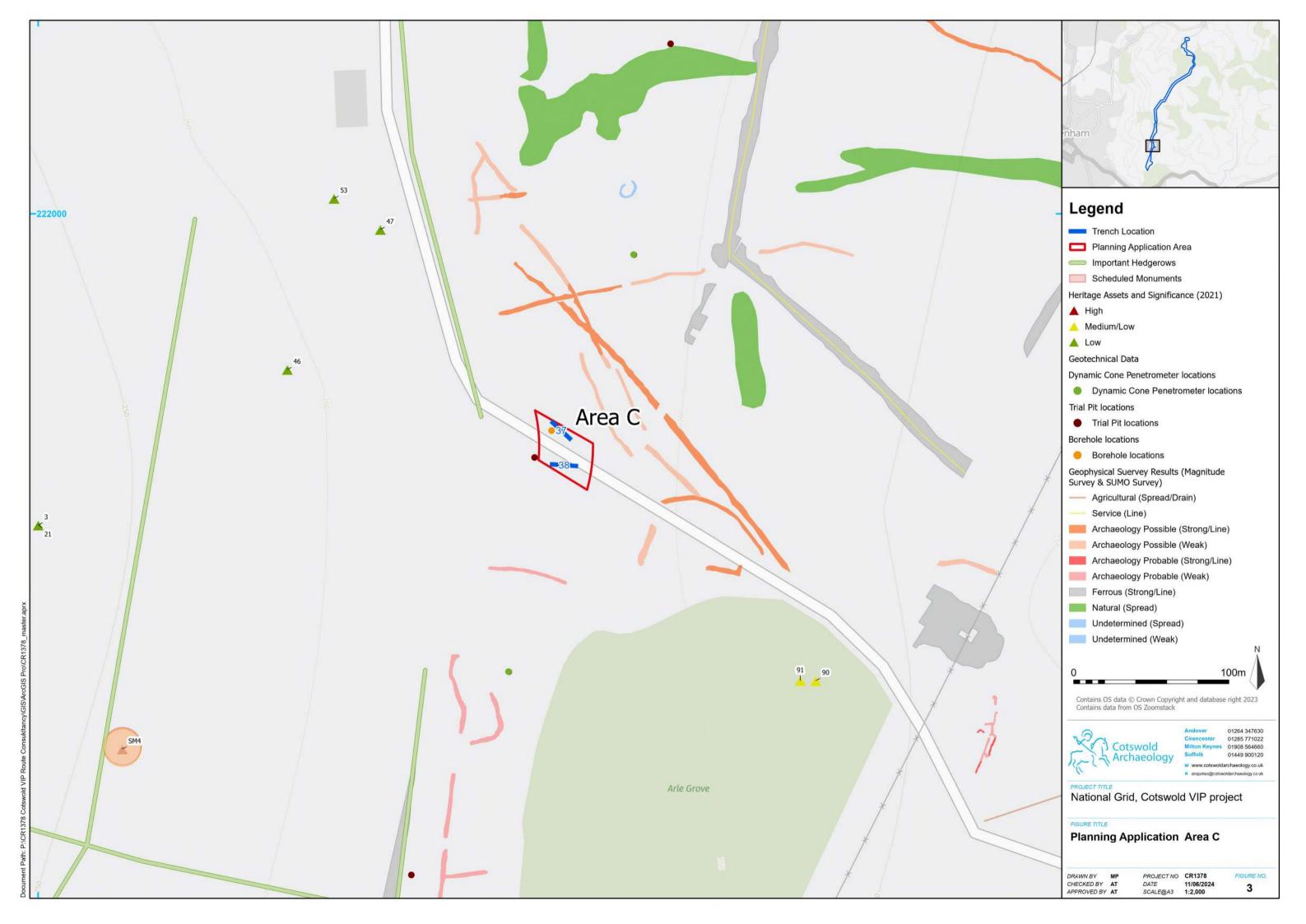
 CR1378_1a
- CA 2024b Cotswolds Visual Impact Provision (VIP), Cotswolds National Landscape:

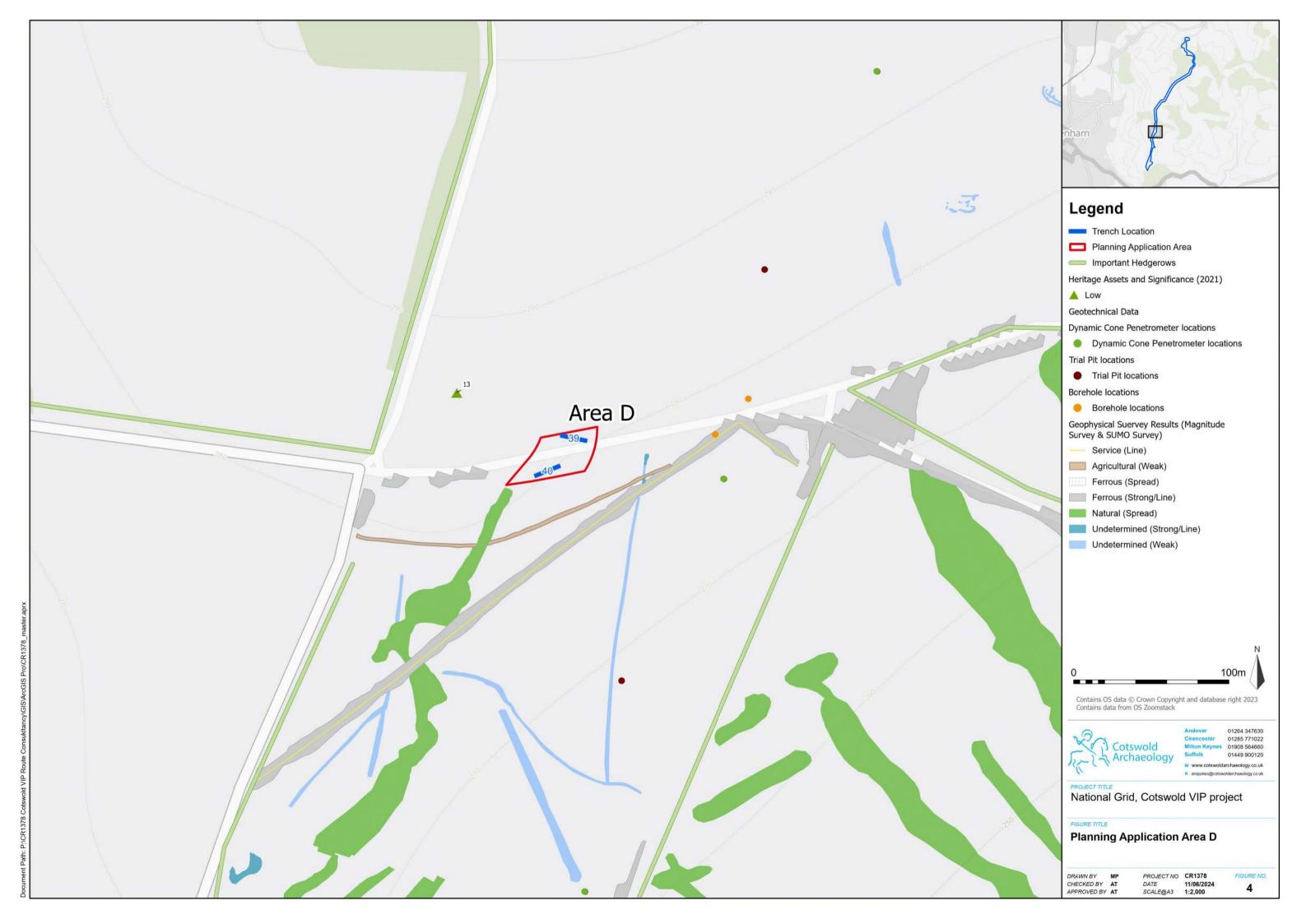
 Archaeological Statement, CA report ref: CR1378_1b
- Cox W 1979 'Exploratory Section across a Newly Discovered Roman Villa in Waltham Field (Whittington) SP 00802093', *Glevensis* 1979, **13**
- MS (Magnitude Surveys) 2024 Geophysical Survey Report: National Grid Cotswolds

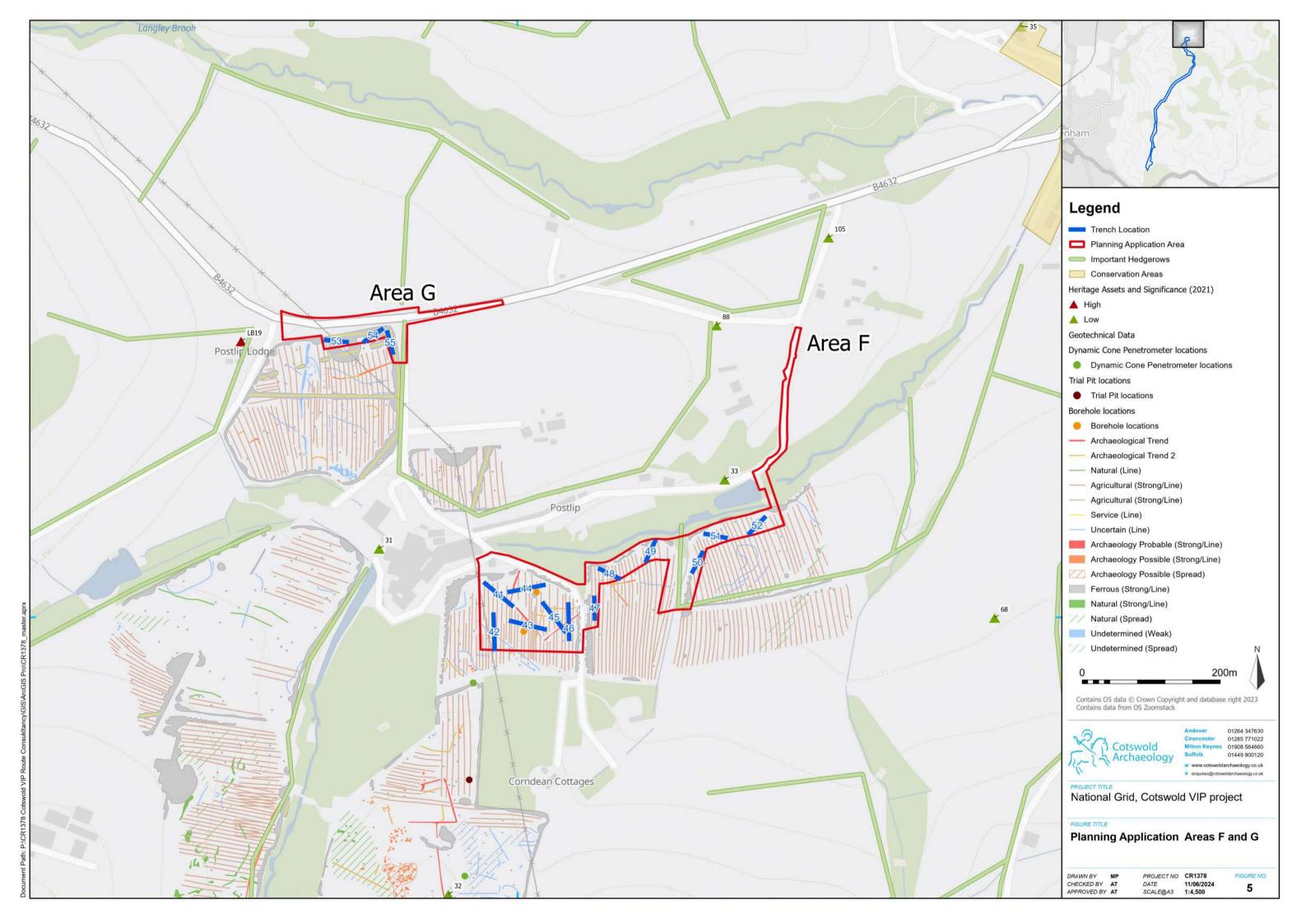
 AONB VIP, Cheltenham Gloucestershire, MS ref: MSSP1587











APPENDIX A: COTSWOLD ARCHAEOLOGY SPECIALISTS

Ceramics

Neolithic/Bronze Age Ed McSloy BA MCIfA (CA)

Alistair Barclay BSc PhD FSA MCIfA (CA) Grace Jones BA MA PhD MCIfA (CA) Jacky Sommerville BSc MA PCIfÀ (CA)

Elaine Morris BA PhD FSA MCIfA (University of Southampton)

Anna Doherty MA (Archaeology South-East) Sarah Percival MA MCIfA (freelance)

Steve Benfield BA (CA)

Ciar Boyle Gifford BA, MA (CA), Apprentice: Archaeological Specialist Level 7

Ed McSloy BA MCIfA (CA) Iron Age/Roman

Alistair Barclay BSc PhD FSA MCIfA (CA) Grace Jones BA MA Phd MCIfA (CA) Peter Banks LLB LLM PCIfA (CA) Jacky Sommerville BSc MA PCIfA (CA) Kayt Marter Brown BA MSc MCIfA (freelance)

Steve Benfield BA (CA)

Claire Collier Jones BA MA (CA)

Ciar Boyle Gifford BA, MA (CA), Apprentice: Archaeological Specialist Level 7 Laura Pearson BA, MA, PCIfA (CA), Apprentice: Archaeological Specialist Level 7

Gwladys Montell MA PhD (freelance) (Samian)

Steve Benfield BA (CA)

David Williams PhD FSA (freelance) (Amphorae stamps)

Alejandra Gutierrez BA (Hons) PHd MCIfA Anglo-Saxon

Alistair Barclay BSc PhD FSA MCIfA (CA) Grace Jones BA MA PhD MCIfA (CA) Jacky Sommerville BSc MA PCIfÀ (CA) Paul Blinkhorn BTech (freelance) Jane Timby BA PhD FSA MCIfA (freelance) Sue Anderson, M Phil, MCIfA, FSA (freelance)

Richenda Goffin BA MCIfA (freelance)

Medieval/post-medieval Alejandra Gutierrez BA (Hons) PhD MCIfA

Ed McSloy BA MCIfA (CA)

Alistair Barclay BSc PhD FSA MCIfA (CA) Grace Jones BA MA PhD MCIfA (CA) Jacky Sommerville BSc MA PCIfA (CA) Stephanie Ratkai BA (freelance) Paul Blinkhorn BTech (freelance) John Allan BA MPhil FSA (freelance) Richenda Goffin BA MCIfA (freelance) Sue Anderson M Phil, MCIfA, FSA (freelance)

South-West Henrietta Quinnell BA FSA MCIfA (University of Exeter)

Clay tobacco pipe Marek Lewcun (freelance)

Kieron Heard (freelance)

Richenda Goffin BA MCIfA (freelance)

Ceramic building material Ed McSloy MCIfA (CA)

Grace Jones BA MA PhD MCIfA (CA) Peter Banks LLB LLM PCIfA (CA) Claire Collier Jones BA MA (CA)

Laura Pearson BA, MA, PClfA (CA), Apprentice: Archaeological Specialist Level 7 Ciar Boyle Gifford BA, MA (CA), Apprentice: Archaeological Specialist Level 7 Richenda Goffin (Roman painted wall plaster) CBM, BA MCIfA (freelance)

Steve Benfield BA (CA) Peter Warry PhD (freelance)

Sue Anderson M Phil, MCIfÁ, FSA (freelance)

Other finds

Small finds Ed McSloy BA MCIfA (freelance)

Grace Jones BA MA PhD MClfA (CA) Claire Collier Jones BA MA (CA)

Richenda Goffin, (non-metalwork) BA MCIfA (CA)

Steve Benfield CA I Riddler PhD (freelance)

Alison Sheridan PhD (National Museum of Scotland)

Metal artefacts Ed McSloy BA MCIfA (CA)

Grace Jones BA MA PhD MCIfA (CA)

Alex Bliss BA, AlfA (CA) Claire Collier Jones BA MA (CA)

Jörn Schuster MA DPhil FSA MCIfA (freelance)

Hilary Cool BA PhD FSA (freelance)

I Riddler PhD (freelance)

Lithics Ed McSloy BA MCIfA (CA)

Jacky Sommerville BSc MA PClfA (CA)
Pippa Bradley BA MPhil Dip Post-Ex MClfA (CA)

Michael Green (CA) Sarah Bates BA (freelance)

(Palaeolithic) Francis Wenban-Smith BA MA PhD (University of Southampton)

Worked stone Ruth Shaffrey BA PhD MCIfA (freelance)

Kevin Hayward FSA BSc MSc PhD PCIfA (freelance)

Inscriptions Roger Tomlin MA DPhil, FSA (Oxford)

Glass Ed McSloy MCIfA (CA)

Hilary Cool BA PhD FSA (freelance) David Dungworth BA PhD (freelance) Sarah Paynter PhD (Historic England) Rachel Tyson PhD (freelance)

Hugh Wilmott PhD (University of Sheffield)

Coins Ed McSloy BA MCIfA (CA)

Alex Bliss (CA)

Peter Guest BA PhD FSA (Cardiff University) Richard Reece BSc PhD FSA (freelance)

Jude Plouviez (freelance)

Andrew Brown PhD (British Museum) Richard Kelleher PhD (Fitzwilliam Museum) Philip de Jersey PhD (Ashmolean Museum)

Leather Quita Mould MA FSA (freelance)

Textiles Penelope Walton Rogers FSA Dip Acc. (freelance)

Sue Harrington PhD (freelance)

Iron slag/metal technology Tim Young MA PhD (Cardiff University)

David Dungworth BA PhD (freelance)

David Starley BSc PhD Lynne Keys (freelance)

Worked wood Michael Bamforth BSc MCIfA (freelance)

Biological remains

Animal bone Clare Randall MClfA (CA)

Matilda Holmes BSc MSc PhD ACIfA (freelance)

Andrew Clarke ACIfA CA Julie Curl (freelance)

Human bone Sharon Clough BA MSc MCIfA (CA)

Frankie Wildmun (CA)

Sue Anderson M Phil, MCIfA, FSA (freelance)

Environmental sampling Sarah Wyles BA MCIfA (CA)

Sarah Cobain BSc MSc ACIfA (CA)

Anna West BSc (CA)

Keith Wilkinson BSc PhD MCIfA (ARCA)

Pollen Michael Grant BSc MSc PhD (University of Southampton)

Rob Batchelor BSc MSc PhD MCIfA (QUEST, University of Reading)

Diatoms Tom Hill BSc PhD CPLHE (Natural History Museum)

Nigel Cameron BSc MSc PhD (University College London)

Charred plant remains Sarah Wyles BA MCIfA (CA)

Sarah Cobain BSc MSc ACIfA (CA)

Anna West BSc (CA)

Wood/charcoal Sarah Cobain BSc MSc ACIfA(CA)

Dana Challinor MA (freelance) Sheils Bordman (freelance)

Insects Enid Allison BSc D.Phil (Canterbury Archaeological Trust)

Mollusca Sarah Wyles BA MCIfA (CA)

Keith Wilkinson BSc PhD MClfA (ARCA)

Ostracods and Foraminifera John Whittaker BSc PhD (freelance)

Geoarchaeology Holly Rogers BA (Hons) MSc (CA)

Keith Wilkinson BSc PhD MCIfA (ARCA)

Soil micromorphology Richard Macphail BSc MSc PhD (University College London)

Scientific dating

Dendrochronology Robert Howard BA (NTRDL Nottingham)

Radiocarbon dating Alistair Barclay BSc PhD FSA MCIfA (CA)

SUERC (East Kilbride, Scotland) Beta Analytic (Florida, USA)

Bayesian chronological

modelling

Derek Hamilton PhD (SUERC) Frances Healey PhD (freelance)

Professor John Hines (Cardiff University)

Archaeomagnetic dating Cathy Batt BSc PhD (University of Bradford)

TL/OSL Dating Phil Toms BSc PhD (University of Gloucestershire)

Conservation Karen Barker BSc (freelance)

Pieta Greaves BSc MSc ACR (Drakon Heritage and Conservation)

Julia Park-Newman (Conservation Services, freelance)



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