WRITTEN SCHEME OF INVESTIGATION FOR HISTORIC BUILDING RECORDING AND ARCHAEOLOGICAL WATCHING BRIEF

'BUILDING L' MANOR FARM SWINDON VILLAGE GLOUCESTERSHIRE

22/02177/COU

PREPARED ON BEHALF OF COUNTY TO COUNTY

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1 INTRODUCTION

- 1.1 This archaeological Written Scheme of Investigation (WSI) has been prepared by GHC Archaeology & Heritage (GHC) on behalf of County to County Property Group Ltd (the client) and details the programme of historic building recording and archaeological watching brief. The WSI is in response to a planning condition attached to the consent for the conversion of a barn (henceforth referred to as Building L) at Manor Farm to residential use (22/02177/COU).
- 1.2 An earlier application for redevelopment of land and Manor Farm (20/00749/FUL) excluded Building L, which was to be retained within that scheme. Archaeological and building recording works associated with that development are ongoing and covered by a separate WSI (GHC 2022).

Site Location and Description

- 1.3 Swindon Village is located immediately to the north-west of the town of Cheltenham within Gloucestershire. The village falls within the administrative area of Cheltenham Borough Council (CBC). The site is located in a residential area on the southern fringes of Swindon Village, to the south of Church Road. It is accessed via a no through road which leads to St Lawrence Court.
- 1.4 The development area is centred on National Grid Reference (NGR) SO 93484 24824 and is approximately *c*. 485 m² in extent (Figure 1). The residence of Manor Farm is located immediately to the east of the current redline area and four new dwellings are currently under construction to the south and east of Building L (as permitted by 20/00749/FUL).
- 1.5 The new development of St Lawrence Court is located to the west and residential gardens associated with new builds in the former grounds of Swindon Hall are located further to the east. The Manor Farm site is bounded to the south-west by Wyman's Brook, a tributary of the River Swilgate, with the land beyond occupied by the Shaftesbury Industrial Estate.
- 1.6 The wider Manor Farm site formerly comprised the farmhouse and a range of barns and outbuildings, with an area of paddocks to the south. The main farmyard area to the south and west of the farmhouse contained eight outbuildings, seven of which have recently been demolished and are being replaced by a small-scale development of residential dwellings.
- 1.7 The original agricultural structures are referenced and briefly described, as Buildings F-M, in previous studies of the site (CA 2019). Building L is located to the west of the former farm yard alongside a footpath which extends southward from Church Road to the a footbridge across Wyman's Brook (Figure 2). The farmyard buildings were tentatively dated as between early-19th and mid-20th century in date. Review of the available evidence would indicate at least one building may have foundations of an earlier origin.

- 1.8 In terms of topography, the site slopes gently to the south-west towards the Wyman's Brook. The highest point within the site is near the entrance, to the northwest, at *c*. 44m above Ordnance Datum (aOD), with the southern part, nearest the river at *c*. 41m aOD. The land continues to rise to the north, with the church of St Lawrence, located *c*. 50m to the north-west of the site entrance, occupying the highest land at *c*. 45m aOD.
- 1.9 The site is positioned on underlying solid geology consisting of Charmouth Formation Mudstone, overlain by alluvial deposits in the southern part of the site and by Cheltenham Sand and Gravel immediately to the north of the site (BGS 2022).

Planning Background

1.10 Planning permission to convert a barn at Manor Farm to residential use has been granted by Cheltenham Borough Council (22/02177/COU) subject to a number of conditions. Condition 23, attached to the decision notice (dated 7th of June 2023), states:

> Prior to the commencement of development (other than development or works required by this condition), a programme of archaeological works shall be carried out in accordance with a Written Scheme of Investigation, details of which shall have first been submitted to and approved in writing by the Local Planning Authority.

> Reason: To ensure that archaeological remains and features are preserved in situ or, if this is not feasible, to enable a record of the remains of archaeological interest to be made prior to their disturbance, having regard to adopted policy HE2 of the Cheltenham Plan (2020) and Historic Environment Good Practice Advice Note 2. Approval is required upfront because archaeological remains and features could otherwise be permanently lost.

- 1.11 The Gloucestershire County Council Archaeologist, acting as advisor to Cheltenham Borough Council, has advised that a basic level of building recording (equivalent to Level 2) should be included in the programme of archaeological works followed by archaeological monitoring of any archaeologically intrusive construction works. The final report should provide a synthesis on the origins and development of the site along with any other archaeological remains revealed during the archaeological monitoring.
- 1.12 This Written Scheme of Investigation (WSI) has been prepared on behalf of County to County Property Group by Ben Barker of GHC Archaeology & Heritage in response to the archaeological condition and is subject to approval by Cheltenham Borough Council.

Historical Background

1.13 The wider site of Manor Farm site has previously been subject to a Heritage Assessment (CA 2019a), followed by an Impact Assessment (CA 2020) that specifically related to the area of permitted development. Two phases of archaeological evaluation (CA 2014b & WSI for Historic Building Recording and Watching Brief: Building L, Manor Farm, Swindon Village

2019a) have also been undertaken on the adjacent plot, now developed as St Lawrence Court, which was once part of the wider Manor Farm site. These reports should be consulted for full details.

- 1.14 In summary, no prehistoric or Roman remains was recorded within the site, although there is well documented evidence for settlement and other associated features of these periods within the general area (CA 2019a).
- 1.15 The ongoing watching brief on the groundworks within the wider site (associated with planning application 20/00749/FUL) has not revealed any significant archaeological remains and the building recording undertaken prior to the demolition of the surrounding buildings has yet to be reported on (Archaeology Warwickshire, forthcoming).
- 1.16 An archaeological evaluation at Elms Park identified evidence for Iron Age to late Roman activity, comprising a dense area of ditched enclosures *c*. 750m to the north-west and a smaller area of ditched enclosures *c*. 200m to the west of the current site (*ibid*.).
- 1.17 A single archaeological trial trench was excavated in on the land immediately to the west of the site in 2019 but this did not identify any features or deposits of archaeological interest (CA 2019b). No archaeological features or deposits were identified during the 2014 evaluation of the same site, although a single sherd of 1st to 2nd century AD pottery was recovered from an alluvial deposit close to the Swilgate River (CA 2014b).
- 1.18 Swindon Village which is likely to have Saxon origins (CBC 2007). The site is located less than 100m to the south-west of the 11th century church of St Lawrence which is likely to have been located at the historic core of the medieval settlement. It is also positioned between the manorial sites of Swindon Manor, *c.* 60m to the west, and Swindon Hall *c.* 85m to the east of the site (CA 2019a)
- 1.19 The southern part of the site has been enclosure from the post-medieval period through to the late 20th century, and the 1841 Tithe Map shows that the northern part has been occupied by a barn and yard since at least the mid-19th century (*ibid*.)
- 1.20 The heritage assessment (CA 2019a) identified most of the buildings at Manor Farm as being 19th or 20th century in date based on the buildings not being shown on an enclosure map of 1808 yet being shown in the tithe map of 1841. However, the particular enclosure map consulted did not actually cover the site but was for a part of Cheltenham approximately 2.5km to the south-east of the site.
- 1.21 Buildings J and K, identified in the CA report are actually parts of a single structure marked as 'Homestead' on the 1841 tithe map, which comprises a substantial structure constructed of timber framing (only the eastern portion of which survives) on an ashlar plinth (the full circuit of which appears to survive). Building L is also shown on the 1841 mapping and may also have earlier origins.

2 **RESEARCH DESIGN**

Building Recording Aims and Objectives

- 2.1 The primary aim of the historic building survey is to record all surviving evidence for the original use and subsequent historical form, function and development of building L prior to its conversion to a domestic dwelling. This will be achieved through the production of a record in line with Historic England Level 2 historic building survey standards (Historic England 2016).
- 2.2 The status and recording strategy to be adopted with respect to the buildings within the wider development area, as identified and provisionally dated by the Cotswolds Archaeology (2019a) Heritage Assessment (Figure 2), is summarised in the table below:

Building	Description	Extant	Notes	HBR Required?
F	Modern timber shed	No	Modern - no apparent heritage value	No
G	Modern concrete block garage	No	Modern - no apparent heritage value	No
н	Modern timber framed store	No	Modern - no apparent heritage value	No
I	Shelter with corrugated iron roof	No	Modern - no apparent heritage value	No
J	Early C19 timber framed store	No	Likely earlier than 19 th century and part of a house rather than a barn.	No -previously subject to a Level 2 survey prior to demolition
К	Pre 1940s, roof lost	No	Within original footprint of J	No -previously subject to a Level 2 survey (as part of J) prior to demolition
L	Early C19 brick and timber barn	Yes	Subject of this WSI	Level 2
М	Modern hay/Dutch barn	No	Largely modern but earlier adjacent stone boundary wall of potential earlier date	No – adjacent stone boundary wall previously recorded

2.3 As the only extant structure within the current development area, Building L is the only remaining structure of heritage interest that requires Historic Building Recording. All other structures of potential interest within the wider development area were surveyed in line with a previous WSI (GHC 2022) as part of planning application 20/00749/FUL.

Watching Brief Aims and Objectives

- 2.4 The overall aim of the programme of archaeological works will be to record and advance understanding of any archaeological remains within the development site prior to their destruction.
- 2.5 This will be realised through the achievement of the following objectives:

- To determine the location, extent, date, character, condition and significance of any archaeological remains disturbed by the demolition process, excavation of foundation trenches, service trenches, general ground reduction or landscaping activity
- To excavate and record identified archaeological features and deposits to a level appropriate to their extent and significance
- To recover environmental evidence where appropriate
- To undertake sufficient post-excavation assessment to confidently interpret identified archaeological features
- To report the results of the watching brief and place them in their local and regional context
- To produce a site archive for deposition with an appropriate museum and to provide information for the local HER to ensure the long-term survival of the excavated data.

3 Research Framework

3.1 The programme of archaeological investigation has the potential to contribute to research priorities identified in the *South West Archaeological Research Framework* (Webster 2008). These may include, but are not limited to the following themes identified in the Research Agenda:

7a: Recording buildings, which should embrace recording evidence and analysis of current and earlier active use of space. There needs to be a greater understanding of different kinds of structure and the detail to be recorded.

15c: The [Post-Medieval to Modern] period is characterised by a growing diversity of rural settlement and activities within that rural settlement. More systematic studies of vernacular architecture as applied to both housing and other rural buildings are required, particularly at the humbler end of the scale. Little work has been done to examine the archaeological evidence of agricultural improvement apart from a few specific examples of landscape.

31c: The origins of the parish, the manor or township, the hundred, the monastic estate and the shire occur in the transition period between Early Medieval times and the end of the 11th century and are a key area for further research.

33a: The transition from the Early Medieval period into the pre-Conquest period is one of the main research areas for rural settlement studies in the region. The origin of villages and their field systems in some areas (notably in the east of the region), is thought to date from the 10th century in this area but further detailed investigation, analysis and dating is urgently needed. Further work needs to be addressed by wider landscape studies and the careful targeting of fieldwork/excavation. There is a particular need to explore the origins and development of landscapes characterised by dispersed settlement patterns in the west of the region.

3.2 The investigations will also take account of the national research programmes outlined in the English Heritage (now Historic England) Strategic Framework for historic Environment Activities and Programmes in Historic England (SHAPE), first published in 2008.

Standards and Guidance

- 3.3 All historic building recording and subsequent reporting will be undertaken to fully meet the requirements of a Level 2 historic building record as defined by Historic England in *Understanding Historic Buildings* (2016). The archaeological watching brief will be undertaken in accordance with the Chartered Institute for Archaeology's *Standard and guidance for an archaeological watching brief* (CIfA 2020b).
- 3.4 This specification conforms to the requirements of the National Planning Policy Framework (MCHLG 2019) (NPPF), the Historic England Historic Environment Good Practice Advice in Planning: 2, Managing Significance in Decision-Taking in the Historic Environment (March 2015). It has been designed in accordance with current best archaeological practice and the appropriate national standards and guidelines including:
 - Code of Conduct (Chartered Institute for Archaeologists 2021)
 - Management of Research Projects in the Historic Environment (Historic England 2015)
 - British Standard BS7913:2013 Guide to the Conservation of Historic Buildings
 - Standard and guidance for the archaeological investigation and recording of standing buildings or structures (Chartered Institute for Archaeologists 2020a)
 - Understanding Historic Buildings. A Guide to Good Recording Practice (Historic England 2016)
 - Standard and guidance for an archaeological watching brief (CIfA 2020b)
 - Standard and guidance for the creation, compilation, transfer and deposition of archaeological archives (CIFA 2020c)
 - Selection, retention and dispersal of archaeological collections (SMA 1993)
 - Gloucestershire Archaeological Archive Standards (SWMDP 2018)
- 3.5 In order that the investigation supplies information of the required quality, all work will be undertaken in accordance with the Code of Conduct and the Standards and Guidance issued by the Chartered Institute for Archaeologists (CIFA 2021).

4 METHODOLOGY

Historic Building - Plans and Drawings

4.1 Annotated measured drawings (to scale or fully dimensioned) of the buildings showing the position and direction of key reference photographs and include floor plans. If required, sections through the building will also be drawn.

- 4.2 All plans will show the form and location of structural features of historic significance, such as blocked doorways, windows and fireplaces, masonry joints, ceiling beams, changes in floor and ceiling levels, and any evidence for fixtures of significance.
- 4.3 Large scale and detailed drawings and plans will be only be produced where individual structural, architectural and ornamental elements of the buildings, internally or externally, warrant recording at a higher level of detail, and where it is safe to do so.

Historic Building - Photographic Record

- 4.4 An external photographic record will be made of all elevations of the Building L's from as near perpendicular to the elevation as possible within the constraints of the site.
- 4.5 A general external photographic record will also be made including a number of oblique views of the building from all accessible sides, showing their setting and to give an overall impression of size and shape.
- 4.6 An interior photographic record will be made of each room or internal space, to record the form, general appearance and manner of construction of each area. This may be limited by access restrictions and health and safety requirements due to the condition of the buildings.
- 4.7 Any external or internal detail, structural or decorative, which is relevant to the design, development and use of the buildings will be photographed, with a scale where appropriate.
- 4.8 Photographs will be taken of any dates or other inscriptions, signage, makers' plates or graffiti which contribute to an understanding of the building. A transcription will be made wherever characters are difficult to interpret. Any building contents which have a significant bearing on the building's history which are still present will also be photographed.
- 4.9 Photographs will be taken with a high resolution digital SLR camera and all photographs will include an appropriate scale where possible. All photography will conform to industry best practice (Historic England 2015c). Images will in TIFF format for archiving. All images will have accompanying metadata specifying; photo ID, capture device, converting software, colour space, bit depth, resolution, date of capture, photographer, caption, and any alterations made to the image.
- 4.10 A register of the location, direction and subject of each shot will accompany the photographic record, and the position and direction will be recorded on copies of the building and site plans.

Watching Brief - Observation, Recording and Investigation

4.11 The areas of investigation covered by this WSI will be confined to the area of the development red line, shown on Figure 1. The archaeological works will comprise archaeological observation, investigation and recording (watching brief) during any

WSI for Historic Building Recording and Watching Brief: Building L, Manor Farm, Swindon Village

development activity that may expose, disturb or destroy archaeological remains or deposits. Such activity is anticipated to include works associated with excavations in advance of the construction of an internal building slab, the installation of services and general ground reduction.

- 4.12 The scope of the watching brief will be subject to review as works progress and may be terminated with the formal agreement of Archaeological Advisor to Cheltenham Borough Council.
- 4.13 Reasonable notice (of at least 48 hours) will be provided to the Archaeological Contractor of any intrusive development works. These will be closely monitored by a suitably experienced archaeologist. Adequate time will be afforded to the Archaeological Contractor to allow for cleaning of the archaeological horizon (where encountered), archaeological excavation, and recording of archaeological deposits and of soil sections.
- 4.14 The archaeological investigation will provide a record of archaeological deposits that are damaged or removed by the works permitted by the current planning consent. Opportunity will be given to the Archaeological Contractor to hand excavate and record any archaeological features which appear during these works.
- 4.15 Should extensive areas of site be reduced in in plan, plant should not track across this until it has been adequately investigated and recorded. The Archaeological Advisor to Cheltenham Borough Council will be given the opportunity to inspect such areas and to agree an appropriate sampling strategy.
- 4.16 All archaeological features exposed will be planned at a scale of 1:20 of 1:50 on a plan showing the proposed layout of the development, depending on the complexity of the data to be recorded. Sections will be drawn at 1:10 or 1:20 depending on the complexity to be recorded.
- 4.17 A photographic record of the work will be made of any archaeological features, consisting of high-resolution digital images follow the requirements of Historic England guidance for digital image capture (Historic England 2015b).
- 4.18 All contexts will be numbered and finds recorded by context. All levels will relate to Ordnance Datum.
- 4.19 Archaeological contexts with potential to contain significant environmental evidence will, where possible, be sampled for palaeo-environmental remains. Allowance will be made for sampling of interpretable and datable archaeological deposits following Historic England Guidance (HE 2011).
- 4.20 All finds will be collected and processed (unless variations in this principle are agreed with LPA Archaeological Advisor during the course of the monitoring).

4.21 The data recording methods and conventions used will comply with CIfA Standard and guidance for an archaeological watching brief (CIfA 2020b) and will be subject to approval by the Archaeological Advisor to Cheltenham Borough Council.

Combined Historic Building and Watching Brief Report

- 4.22 The results of historic building recording will be combined with the reporting on the archaeological monitoring of the construction works. The final report will be provided by the archaeological contractor and will provide a synthesis on the origins and development of the site along with any other archaeological remains revealed during the archaeological monitoring.
- 4.23 If practicable, and subject to the timing of the works, the results will be integrated with those from the ongoing archaeological works being undertaken in accordance with the approved WSI (GHC 2022) relating planning application 20/00749/FUL (Figure 2). This approach to reporting would be subject to written confirmation from the Gloucestershire County Council Archaeologist on completion of the fieldwork.
- 4.24 The results of the historic building recording and watching brief will be presented in a fully illustrated descriptive report. The report contents will be partly determined by the results of the survey but is likely to include some, or all, of the following elements to meet the requirements of a Level 2 survey.
 - The precise location of the building as an address and a National Grid Reference
 - A note of any statutory designation (that is, listing, scheduling, Register of Historic Parks and Gardens, conservation area)
 - The date when the record was made, the name(s) of the recorder(s) and the location of any archive material
 - A contents list; a list of illustrations or figures
 - A summary statement. This will summarise the building's form, function, date and sequence of development. The names of architects, builders, patrons and owners should be given if known
 - An introduction briefly setting out the circumstances in which the record was made, its objectives, methods, scope and limitations, and any constraints.
 - A discussion of the published sources relating to the building and its setting, an account of its history as given in published sources, an analysis of historic map evidence (map regression) and a critical evaluation of the previous records of the building, where they exist
 - An account of the building's overall form (structure, materials, layout) and of its successive phases of development, together with the evidence supporting this analysis
 - Any evidence for the former existence of demolished structures or removed plant associated with the building.

- A site plan relating the building to other structures and to any related topographical and landscape features
- Measured drawings recording the form or location of significant structural detail
- Measured drawings to show the form of any architectural decoration or small-scale functional detail not easily captured by photography
- Measured and photogrammetric elevations, where these are necessary, to provide an understanding of the building's design, development or function
- Copies of historic maps, drawings, views or photographs illustrating the development of the building or its site
- Full bibliographic and other references, or a list of the sources consulted
- A complete set of building plans of all buildings marked with the position and location of each photograph cross-referenced with the photographic register
- Detailed photographic register cross-referenced with all plans
- A description of the site archive and name of the institution where it will be deposited.
- 4.25 A report on the archaeological fieldwork and archive will include a clear statement of the archaeological value of the results, and their significance. The results will be related to the relevant known archaeological information held in the Gloucestershire HER, and an HER search will be commissioned that includes a 1km study area around the cable trench area.
- 4.26 Should the watching brief encounter significant archaeological remains a summary report will be prepared for submission with a suitable local journal such as the *Transactions of the Bristol and Gloucestershire Archaeological Society*.

Archive

- 4.27 The Archaeological Contractor will consult The Wilson, Cheltenham Art Gallery and Museum to obtain an accession number for the project before commencement of the fieldwork. This number will be used on site and for all documentation and archives relating to the project.
- 4.28 An archive of all records and finds will be prepared and will be adequate to perform the function of a final archive in accordance with the Gloucestershire Archaeological Archive Standards (2018).
- 4.29 It is expected that the landowner will deposit the full site archive and transfer title to The Wilson, Cheltenham Art Gallery and Museum.
- 4.30 The Archaeological Contractor will consult with the intended archive depository before the archive is prepared regarding the specific requirements for the archive deposition and curation (including the digital archive), and regarding any specific cost implications of deposition.
- 4.31 Following approval of the report by CBC's Archaeological Advisor a single copy of the report will be presented to the Gloucestershire HER as well as a digital copy of the approved report.

- 4.32 All parts of the OASIS online form (<u>http://ads.ahds.ac.uk/project/oasis/</u>) will be completed and a copy must be included in the final report and also with the site archive. A digital copy of the report will be uploaded to the OASIS website on approval of the report.
- 4.33 The project archive will be prepared according to the recommendations in Guidelines for the Preparation of Excavation Archives for long-term storage (UKIC 1990); Standards in the Museum Care of Archaeological Collections (Museums and Galleries Commission 1992); the Archaeological Archives Forum's Guide to best practice in creation, compilation, transfer and curation for archaeological archives (Brown 2011); the Selection, retention and dispersal of archaeological collections (SMA 2015) and Gloucestershire Archaeological Archive Standards (2018).

5 TIMETABLE & PERSONNEL

- 5.1 Paul Gajos MCIfA, Director for GHC, will be in overall charge of the project. Ben Barker (Head of Archaeology at GHC) will monitor the archaeological site work on behalf of the developer.
- 5.2 The historic building recording will be undertaken by a suitably qualified and experienced professional archaeological contractor, which will adhere to the CIfA Code of Conduct (2019) and all appropriate standards and guidance. Details of the CVs of key personnel and specialists can be provided to the LPA Archaeologist in advance of the commencement of fieldwork, following appointment of the archaeological contractor.
- 5.3 The appointed archaeological contractor's Project Manager will be able to demonstrate competence and experience of managing historic building recording projects of a similar size, nature and complexity. The archaeological contractor will be responsible for the organisation and management of all health and safety on site in line with all professional guidance.

6 MONITORING

- 6.1 The aims of monitoring are to ensure that the archaeological works are undertaken within the limits set by this specification, and to the satisfaction of the Local Planning Authority's archaeological advisor.
- 6.2 Ben Barker (GHC head of Archaeology) will monitor implementation of the programme of works on behalf of the developer.
- 6.3 The development control archaeologist or conservation officer may exercise the right to monitor the implementation of the works on the behalf of the local planning authority. The purpose of any such visit is to ensure that the fieldwork element has been undertaken in compliance with this document.
- 6.4 When fieldwork is complete, the LPA Archaeological Advisor will be informed and the site archive prepared.

7 INSURANCE

7.1 The archaeological contractor will produce evidence of Public Liability Insurance to the minimum value of £5m and Professional Indemnity Insurance to the minimum of £5m.

8 HEALTH & SAFETY

- 8.1 All works will be undertaken in compliance with the Health and Safety at Work Act (1974) and all applicable regulations and Codes of Practice. All archaeological staff will undertake their operations in accordance with safe working practices and will be CSCS certified. At least one First Aider will be present on site at all times.
- 8.2 A site-specific risk assessment will be produced by the appointed archaeological contractor, prior to the commencement of work on site, which will be subject to regular review.
- 8.3 All fieldwork staff will be required to wear suitable Personal Protective Equipment (PPE), including hi-visibility coats/vests, hard hats, safety boots and gloves, as well as safety glasses if required. Suitable PPE and welfare facilities will be provided by the archaeological contractor.
- 8.4 All staff will receive a health and safety induction prior to starting work on site to be provided by the archaeological contractor, and visitors to the site will receive an induction as required. The archaeological contractor will provide all staff on site with copies of all health and safety documentation.
- 8.5 Regular audits of health and safety practices will be carried out during the course of the project by GHC and the archaeological contractor in consultation with the site workforce. Toolbox talks on health and safety issues will be conducted at minimum weekly intervals and/or after changes in working practices or identification of new threats/risks. The risk assessment will be reviewed and updated as necessary. Control measures will be implemented as required in response to specific hazards.
- 8.6 Safe working will take priority over the desire to record the buildings, and where it is considered that recording is dangerous, any such features will be recorded by photography at a safe distance.
- 8.7 No building recording will be undertaken in buildings deemed by the surveyor on site to be structurally unsafe, or to contain other safety hazards (e.g., suspected asbestos, chemicals etc.). Suitable arrangements will be made with the client for decontamination/making safe as necessary and appropriate. Where survey work is carried out at the same time as the work of other contractors, regard will be taken of any reasonable additional constraints that these contractors may impose.

9 COPYRIGHT AND PUBLICITY

- 9.1 Copyright of the documentation prepared by the archaeological contractor and specialist subcontractors should be the subject of additional licences in favour of County to County, GHC Archaeology & Heritage and the Gloucestershire/CBC Archaeological service to use such documentation for their statutory and educational functions, and to provide copies to third parties as required.
- 9.2 Under the Environmental Information Regulations (EIR 2005), information submitted to the HER becomes publicly accessible, except where disclosure might lead to environmental damage, and reports cannot be embargoed as 'confidential' or 'commercially sensitive'.
- 9.3 It is recognised that the project may identify remains which are of interest to the public and these may be publicised through appropriate media. Any publicity for the project proposed by the archaeological contractor should be approved by GHC and Bellway.
- 9.4 The appointed contractor will not issue any information on the work through media, internet or social media without prior agreement with GHC.
- 9.5 Care will be taken to ensure that any publicity does not compromise the security of archaeological remains that may have been identified or recovered. Any approaches by the press to the archaeological contractor should be referred to GHC in the first instance.

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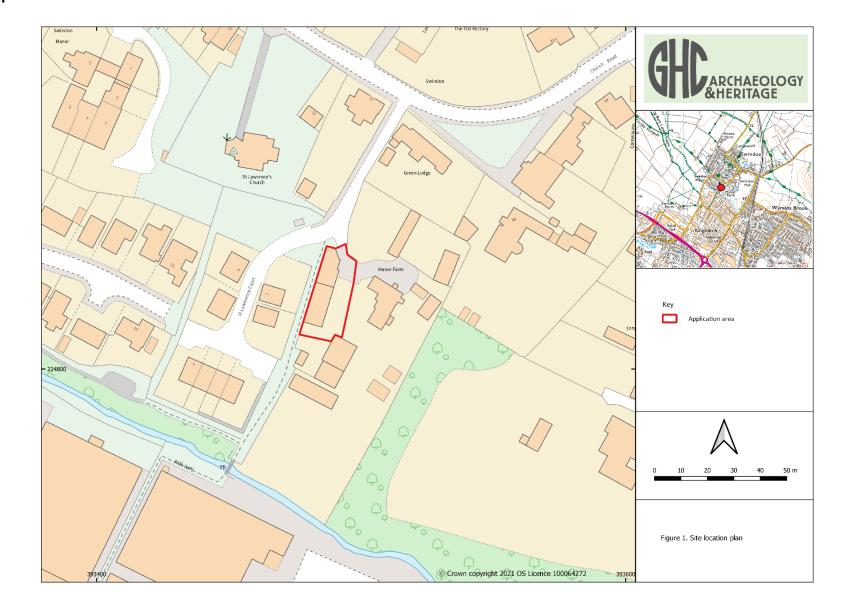
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FIGURES:



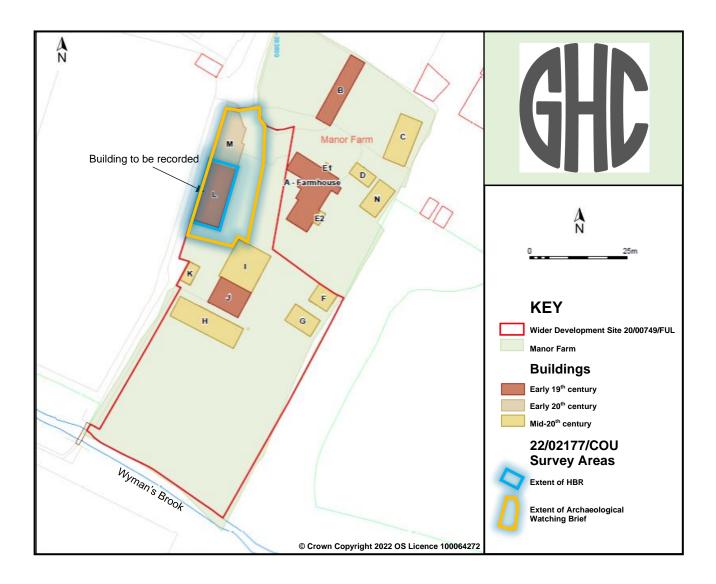


Figure 2: Building locations and survey area extents

(after Cotswold Archaeology 2021 Figure 1b)

