

Neighbourhoods Directorate
Planning and Infrastructure
Development Management
PO Box 30, Civic Centre, West Street
Oldham OL1 1UQ

Your Ref: PA/343269/19

Date: 7th June 2019

Dear Graeme Moore,

Archaeological Consultation: PA/343269/19 Hybrid Planning Application comprising of: Part A - Full Planning Application for the development of a new link road between Knowls Lane and Ashbrook Road and associated works, and Part B - Outline Planning Application for the development of up to 265 dwellings, open space and landscaping, with all matters reserved except for access. - Re-submission of Planning Application PA/340887/17. Land At Knowls Lane, Oldham

Thank you for your consultation on the above application.

National Planning Policy Framework (NPPF - 2018) paragraph 189 states,

“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected”.

And

“As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise”.

And

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**”.

The proposed development area (PDA) (Parts A & B) covers c.15.79ha. Much of the land within the PDA north of Thornley Brook will be relatively unaffected by the proposals. This part of the PDA is presently heavily wooded with public access and footpaths. The intention is for this area to remain substantively unchanged by the proposals. The main impact north of Thornley Brook will be in the west of the PDA associated with Part A of the application – the construction of a new link road between Knowls Lane and Ashbrook Road. The bulk of the PDA lies south of Thornley Brook, and it is here that Part B seeks outline application for up to 265 dwellings to be constructed.

The present application has been submitted with an archaeological desk-based assessment (DBA) prepared by Orion Heritage Ltd in 2017. GMAAS can confirm that the Historic Environment Record for this area was consulted in the preparation of the DBA. Following a brief introduction and discussion of the site's location, topography and geology (1.0) and a more extensive

account of the background in relevant planning law, policy and advice (2.0) the DBA provides a period-by-period account of what is known or recorded about the archaeological heritage of the PDA and its immediate environment. This has been informed by drawing together information from documentary, cartographic and index sources including the HER. The search of the HER included the results from a search radius around the PDA boundary of 250m. This latter point becomes important when considering the conclusions and recommendations reached by the DBA. A map regression exercise draws upon a range of maps from 1610 onwards. The first map to show the PDA in any detail is Greenwood's (1818).

Having reviewed the known evidence the DBA goes on to consider the nature of the proposed development and its impact upon any known or suspected heritage assets that may lie within the PDA (4.0) and presents a summary of the DBA's conclusions (5.0). It should be acknowledged that the DBA does meet the necessary standard for such a report. On this basis GMAAS accepts the report as meeting the basic requirements set-out in the NPPF.

The conclusions arrived at in the report do however present a problem. With respect to Part A of the application, the DBA recognises that the construction of the road will in all likelihood expose and damage the buried remains of Clough Mill, a cotton mill constructed in the latter half of the nineteenth century and which stood until the latter half of the twentieth century. The DBA, recognising a local significance to the mill and any remains that may survive, recommends that a watching brief is maintained during the construction of the proposed link road in the north of the site as a condition of consent (4.6). GMAAS has no argument with this recommendation.

For the land south of Thornley Brook within the PDA, land which will be the subject of Part B of the application, the DBA suggests that the site has a low potential for archaeological remains predating the Modern period (5.2). For example, having reviewed the available known evidence (3.0) and recognised that "There are no recorded archaeological assets of prehistoric date within the site or its surroundings" (3.2) a short, generalised discussion follows (3.3 - 3.8) that is then used to conclude "Based on the current evidence, a low potential is therefore identified for prehistoric activity on the site" (3.9). This is then translated into the statement in 5.2, with no recommendation for any work to be undertaken south of Thornley Brook. That said, the DBA does not explicitly rule out some form of conditioned mitigation south of Thornley Brook.

The problem for the DBA is two-fold. Firstly, to the best of our knowledge the land in question has never been subject to archaeological investigation. For periods where most evidence exists as an archaeology below the ground surface this means it is wholly unsurprising no prehistoric discoveries have been recorded within the PDA. The same argument can also be applied to many aspects of the archaeology of early historic periods. There is no mention in the DBA of a site walkover study, which might have been able to recognise subtle earthworks, having been undertaken. There is a reference in the bibliography to the use of open LiDAR Data, but there is no discussion of this in the text. Aerial photography also does not seem to have featured in the assessment. The 1996 'Cities Revealed' aerial photography series, for example, shows a pasture landscape criss-crossed by various earthworks, many of which undoubtedly relate to agricultural practice in the last 200 years. For the PDA it is only the evidence of the historic mapping that held out any realistic prospect of heritage assets being identified in the DBA, which is precisely what happened.

Secondly, the tight search radius of 250m meant that a series of entries on the HER lying just beyond that distance were not identified and not included for consideration. For example, HERs 478.1.2 and 8230.1.0 refers to prehistoric flint scatters at Quick Edge 1.3km to the south-east of the centre of the PDA. HER 5913.1.0 refers to a Bronze Age spearhead or rapier found 820m to the south-east of the centre of the PDA. HERs 478.1.0 and 478.1.1 also refer to prehistoric flint scatters – Brown Edge 1 and 2 – that lie 1.1km to the south south-east. HER 5915.10 refers to a flint adze found 1.4km to the south-west.

The impact of choosing so tight a search radius has been to limit the perspective available to the assessment. As the search was confined to the digitised record and conducted remotely, with no visit to the HER involved, the DBA was unable to benefit from curatorial understanding of the

limitations of the digitised HER and the variable history of archaeological endeavour in the area.

The PDA for Part B of the application slopes gently down to the north towards Thornley Brook. It is bisected by a stream and small valley that flows south to north into Thornley Brook along with 3 separate drains rising from springheads within the PDA. Whilst much of the land is presently grassland pasture it is clear that some areas are dominated by a rougher vegetation more akin to gritstone upland environments. It is GMAAS' view that this large block of largely undeveloped landscape with all of its topographical, fluviological and vegetational variability may well preserve evidence for pre-modern archaeology. GMAAS is concerned that the proposed development (PART B) would destroy any such evidence. Without the evidence of archaeological evaluation it is simply not possible to assure the applicant that the site does not contain, for example, prehistoric archaeology that might prove to be of national significance.

In accordance with NPPF paragraph 189 GMAAS advises Oldham Local Planning Authority that the application should not be determined until the results of an archaeological evaluation of the land south of Thornley Brook has been completed and reported.

The evaluation should combine fieldwork with a detailed review and analysis of aerial photographic coverage. There should be a detailed archaeological walkover survey to ground-truth and record any earthworks indicated on the aerial photography. The evaluation should see a programme of geophysical survey undertaken to identify possible sub-surface anomalies that may be of archaeological interest. Targets from all of this work should then be subject to evaluation trenching, with a background of standard-array trenching to provide general coverage amounting to a total of 5% coverage. The evaluation trenching should be undertaken with a concern both for the archaeology of features and artefacts. The topsoil being machined should be sample sieved on-site for artefacts. Where artefacts are found a decision will need to be made whether to continue with machine stripping of the trenches or proceeding by hand excavation.

Should Oldham Local Planning Authority be minded to ignore GMAAS' advice and grant planning consent without the results of an archaeological evaluation being made available then GMAAS' reserve position would be advise that a negative planning condition be attached to the planning consent. This would potentially expose the developer to the hidden costs and risks of dealing with complex or significant archaeological remains. This would also run the risk of nationally significant archaeology being destroyed by the development and run counter to government advice in NPPF paragraph 189. Should Oldham Local Planning Authority be so minded, the condition must require an archaeological watching brief be undertaken in connection with Part A of the application, and a programme of archaeological work in connection with Part B of the application commencing with detailed aerial photographic review and analysis. A detailed archaeological walkover survey to ground-truth and record any earthworks indicated on the aerial photography would follow. The evaluation should see a programme of geophysical survey undertaken to identify possible sub-surface anomalies that may be of archaeological interest. Targets from this work should then be subject to targeted evaluation trenching, with a background of standard-array trenching to provide general coverage amounting to a total of 5% coverage. The evaluation trenching should be undertaken with a concern both for the archaeology of features and artefacts. The topsoil being machined should be sample sieved on-site for artefacts. Where artefacts are found a decision will need to be made whether to continue with machine stripping of the trenches or proceeding by hand excavation. The evaluation results would then inform the need or otherwise for a further phase of targeted open area archaeological excavation.

To secure the work GMAAS recommends that the following form of words is used in the condition:



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AUTHORITIES

Prior to the commencement of any development related groundworks the applicant or their agents or successors in title will secure the implementation of a programme of archaeological works. The works are to be undertaken in accordance with a Written Scheme of Investigation (WSI) submitted to and approved in writing by the local planning authority. The WSI shall cover the following:

Regarding Part A of the Application:

- 1) An archaeological watching brief.*

Regarding Part B of the Application:

1 A phased programme and methodology of investigation and recording, to include:

- i) Aerial photography assessment*
- ii) Topographic/ walk-over survey and recording*
- iii) Geophysical survey*
- iv) Targeted archaeological evaluation trenching (with sample sieving)*
- v) Targeted open area archaeological excavation*

Regarding Parts A and B of the Application:

2. A programme for post investigation assessment to include:

- i) detailed analysis of site survey records, materials and observations*
- ii) production of a final report on the heritage interest represented.*

3. Deposition of the final report with the Greater Manchester Historic Environment Record and Oldham Local Studies Library

4. Dissemination of the results commensurate with their significance.

5. Provision for archive deposition of the report and records of the site investigation.

6. Nomination of a competent person or persons/organisation to undertake the works set out within the approved WSI.

Reason: In accordance with NPPF Paragraph 199 - To record and advance understanding of heritage assets impacted on by the development and to make information about the heritage interest publicly accessible.

GMAAS will monitor the implementation of the archaeological works on behalf of Oldham Local Planning Authority.

Yours sincerely



A. M. Myers BA MSc PhD MCIFA FSA
Senior Planning Archaeologist
Tel: 0161 295 6917