

From: Ian Miller
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Cc:
Bcc:
Date: Fri, 12 Jan 2024 13:51:49 +0000
Subject: Application 70284 - Application for Reserved Matters Approval Condition 13 (WSI for Archaeology)
- Former East Lancs Paper Mill & Tower Farm

Good afternoon Helen

RE: Application 70284 - Application for Reserved Matters Approval Condition 13 (WSI for Archaeology) - Former East Lancs Paper Mill & Tower Farm, Church Street East, Cross Lane, Street & Brook Street, Radcliffe

Thank you very much for consulting GMAAS on the above application to approve the detail submitted with respect to the archaeological requirements secured via Condition 13.

The application is supported by a Written Scheme of Investigation (WSI) prepared in July 2019 by the WYG Group. For the most part, this sets out an appropriate scheme of initial archaeological investigation via evaluation trenching, in line with the requirements of Condition 13. There are, however, a couple of minor details in the document that really should be updated before I would be entirely comfortable recommending its approval:

- Part 6 of Condition 13 requires 'nomination of a competent person or persons/organisation to undertake the programme set-out within the approved WSIs.' The WSI has been prepared by the WYG Group although, to the best of my knowledge, this company no longer exists *per se*, having recently amalgamated with Tetra Tech. This should really be reflected in WSI, together with details of the team that will actually be undertaking the archaeological investigation. The document makes numerous references to 'the archaeological contractor' and whilst I appreciate that a contractor has yet to be appointed, GMAAS will need to be confident that the team undertaking the fieldwork has the appropriate experience, *eg* demonstrable experience of industrial archaeology and/or a ClfA Registered Organisation.
- The scheme includes the creation of an access route to the new cricket ground adjacent to Radcliffe Tower, in an area of archaeological sensitivity. This is acknowledged in the WSI that, in paragraph 2.23, commits to implementing 'a small excavation' in advance of construction work but no further information is provided. Details of the scope, extent and methodology for this element of the investigation should be provided in the WSI.
- Paragraph 6.9 commits to supplying GMAAS with all the digital data generated from the fieldwork, including CAD files, GIS files, etc, as part of the archiving process. This data should actually be submitted to the Archaeological Data Service, as GMAAS only requires a digital copy of the final report for inclusion in the Historic Environment Record.
- As an aside, a recent revision of professional guidelines by the Chartered Institute for Archaeologists has substituted the term 'Written Scheme of Investigation (WSI)' for 'Project Design'.

In all other respects, the WSI / Project Design is fine and if the minor details above could be addressed then I will be pleased to recommend a **partial discharge** of the condition in that the pre-commencement element has been addressed. Full discharge of the condition can be recommended in due course once all the required elements of fieldwork have been completed, together with post-excavation analysis and reporting, the deposition of a project archive and an appropriate level of dissemination.

I hope that this is okay.

With kindest regards

Ian