



University of
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MANCHESTER

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Helen Leach
Bury Council
Town Hall
Knowsley Street
Bury
Lancashire
BL9 0SW

Your Ref: 70222
Date: 28th November 2023

Dear Helen,

Archaeological Consultation: 70222 – Erection of 57 no. dwellings, the retention of a chimney and the demolition of 3 existing buildings, together with engineering operations to create a development platform, public car park, substation, public open space, landscaping, drainage, the layout of internal estate roads and footways and other associated works – Former Mondi/Holcombe Mill, Bridge Street, Ramsbottom, Bury, BL0 0BS

Thank you for consulting GMAAS on this application.

In accordance with NPPF 194 the application is supported by an archaeological Desk Based Assessment (DBA) produced by Archaeological Research Services (ARS Ltd) in August 2019, and a Heritage Impact Assessment produced by Lichfields in October 2023, providing a baseline understanding of the above and below ground heritage environment and the potential impacts of development upon it.

The DBA was produced following comments provided by the former Senior Planning Archaeologist at GMAAS in response to a pre-application consultation in 2018 (02214/E), and made specific recommendations for further work, including: a Historic England Level 1 survey of all three standing structures, and once the safety exclusion zone around the chimney had been lifted a phase of targeted trial trenching to be carried out across the site to assess the survival of remains below ground associated with the former Holcombe Mill complex, in particular those areas relating to the footprint of the original paper mill.

A Written Scheme of Investigation (WSI) for this work was then produced by ARS Ltd (February 2020) and approved by GMAAS. The same WSI has been submitted alongside the current application, however the parameters of the development proposals have changed somewhat, in that they now call for demolition of all three standing structures rather than just one, leaving just the chimney and elements associated with the historic goyt (water management system) to be incorporated into the new site plan.

Given that there is now more detail regarding the layout of the proposed development, and a number of years have passed since the WSI was approved - in which time the North West Historic Environment Research Framework has been updated, the NPPF has been revised, and there have been staffing changes at GMAAS - **there should be an opportunity for the WSI to be revisited, updated and revised so that the scheme of works is more appropriate.**



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GMAAS will be happy to review and provide comment on an updated/revised WSI, which should include appropriate methodologies for fieldwork and post-excavation analysis, reporting, dissemination, and archiving. The fieldwork coverage should include the following:

- Historic building recording set at Historic England Level 1-2, to ensure that as much information as is reasonably and safely practicable is recorded prior to the demolition and full loss of the three buildings identified for survey. There is particular interest in the northern side of building C, where the building recording could inform on an area for post-demolition evaluation of two square structures (possible earlier chimneys) as depicted on the 1892 OS plan (Figure 3 of the WSI). All demolition should cease at slab level in case below-ground evaluation or watching brief is needed here to understand the building's development.
- A low-level photographic survey of the surviving chimney and goyt should be undertaken prior to their refurbishment.
- The archaeological evaluation trenching plan needs some slight revisions to target the most appropriate parts of the site, including:
 - an L-shaped Trench 1 in the former boiler house (No.7 on the 1983 plan shown in Figure 6 of the DBA)
 - instead of Trench 3 a targeted strip-map-sample area over the footprint of the 'Old Engine House' (No.14A on the 1983 plan shown in Figure 6 of the DBA)
 - removal of Trench 2 and replacement with a targeted strip-map-sample area over the turntable at the south-east corner of the boiler house/south-west corner of the main mill structure depicted on the 1892 OS plan (Figure 3 of the WSI)
- Depending upon the results of the building recording and archaeological evaluation/strip-map works there may be a need to undertake targeted archaeological area excavation and/or development watching brief(s) to record any further significant surviving remains.

GMAAS recommend that this programme of archaeological works is secured by a condition of planning consent and should be undertaken prior to the commencement of any demolition or development-related groundworks. The condition should be worded as follows:

No demolition or development shall take place until the applicant or their agents or successors in title has secured 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:

- 1. Informed by the North West Historic Environment Research Framework, a phased programme and methodology of investigation and recording to include:***
 - i - archaeological building survey (HE Level 1-2)***
 - ii – targeted archaeological trenching and strip-map-sample evaluation***
 - iii - informed by the above, more detailed targeted excavation and/or development watching brief(s) (subject of a new WSI).***
- 2. A programme for post investigation assessment to include:***
 - i - analysis of the site investigations records and finds***
 - ii - production of a final report on the investigation results.***
- 3. Deposition of the final report with the Greater Manchester Historic Environment Record.***
- 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 Section 16, Paragraph 205 - To record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.

The work should be undertaken by a suitably experienced and qualified archaeological contractor, funded by the applicant, and in accordance with guidance provided by GMAAS who would also monitor the implementation of the works on behalf of Bury Council.

Yours sincerely,



Ben Dyson BA MLitt

Senior Planning Archaeologist

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