



MORRIS HOMES

EAST LANCASHIRE PAPER MILL

PROJECT DESIGN ADDENDUM: ARCHAEOLOGICAL WORKS

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NOVEMBER 2024

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APPENDIX 1: DRAWINGS

DRAWINGS	TITLE	SCALE
GM13502-A-001	Figure 1: Archaeological Monitoring Location	1:500

1 INTRODUCTION

- 1.1 Wardell Armstrong LLP (WA) has been commissioned by Morris Homes on behalf of Homes England and Bury Council (hereafter referred to as 'the Client') to prepare addendum to a Written Scheme of Investigation (WSI) prepared by WYG (WYG 2019) for a scheme of archaeological evaluation at the former East Lancashire Paper Mill (ELPM), Radcliffe, Greater Manchester, hereafter referred to as 'the Site').
- 1.2 The WSI summarises the archaeological and historic background and significance of the Site and outlines a programme of archaeological evaluation to establish 'the presence or absence of any surviving archaeological remains, and to facilitate their recording ahead of construction' (WYG 2019).
- 1.3 This document is an addendum to the WSI, adding supplemental detail and/or updates to legislation, policy and guidance in line with a consultation response, dated 12th January 2024, from the Heritage Management Director at Greater Manchester Archaeological Advisory Service (GMAAS). During production of this addendum Wardell Armstrong consulted with Historic England and GMAAS in November 2024. This addendum must be read alongside the WSI which is included in Appendix 1.
- 1.4 Note that in line with updated professional guidance from the Chartered Institute for Archaeologists (CIfA) issued in December 2023, the term 'Written Scheme of Investigation' has been substituted with 'Project Design'.

2 PLANNING BACKGROUND

- 2.1 An outline planning application (Ref: 62969) was submitted to Bury Council in June 2018): *Outline application for up to 400 residential dwellings including details of vehicular access (all other matters reserved) and associated works including relocation of cricket pitch, including a pavilion, provision of open space and sports facilities and demolition of existing building and structures*, was submitted to Bury Council in June 2018.
- 2.2 GMAAS was consulted in July 2018 and recommended a condition be attached to any consent granted requiring that a programme of archaeological work be undertaken. The application was approved with conditions in December 2019, Condition 13 deals with the historic environment:

No development shall take place unless or until the applicant or their agents or their successors in title have secured the implementation of a programme of archaeological works. The programme is to be undertaken in accordance with Written Schemes of

Investigation (WSIs), which must be submitted to and approved in writing by the Local Planning Authority. The WSIs shall cover the following:

1. A phased programme of archaeological fieldwork to include:

- An updated programme of archaeological desk-based assessment which will inform:*
- A programme of archaeological evaluation trenching; and*
- Targeted open area excavation (subject to a separate WSI).*

2. A programme for post investigation assessment to include:

- Analysis of the site investigation records and finds;*
- Production of a final report.*

3. Provision for publication and dissemination of the analysis and report on the site investigation.

4. A scheme for presentation and commemoration of the site's heritage

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

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

Reason. To make a record and advance understanding of heritage assets impacted on by the development and to make the information about the heritage interest publicly accessible pursuant to Policies EN3/1 – Impact of Development on Archaeological Sites, EN3/2 – Development Affecting Archaeological Sites and EN3/3 – Ancient Monuments of the Bury Unitary Development Plan and Section 12 of the National Planning Policy Framework. 14 If the development hereby approved does not commence before 30th April 2019.

2.3 The Joint Places for Everyone (PfE) Development Plan was adopted by Bury Council in March 2024 and supersedes some of the Bury Unitary Development Plan (UDP) planning policies. The above policies remain unchanged however and remain planning policy as part of the UDP.

2.4 The National Planning Policy Framework has been revised several times since 2018, most recently in December 2023 and Section 12 Conserving and enhancing the natural environment is now included as Section 16. The relevant paragraphs are 199 and 211.

- 2.5 A reserved matters planning application (Ref: 70284) was submitted to Bury Council in November 2023:

Application for reserved matters approval (appearance, landscaping, layout and scale) for the erection of 400 dwellings, relocation of cricket pitch, including a pavilion, practice nets and scoreboard and including all details required to discharge the following conditions from application 67597; 9 (Acoustic Attenuation); 11 (Surface Water Drainage Proposals); 13 (WSI for Archaeology); 14 (Bat Roost Assessment); 15 (Bat Survey for New Cricket Club Site); 16 (Otter Assessment); 18 (Bird Survey for New Cricket Club Site); 19 (RAMS for Badger Habitat); 20 (Invasive Species Report); 21 (Water Framework Directive Assessment); 22 (No Negative Impacts on River Irwell Ecology); 23 (Landscape & Habitat Creation Details); 24 (Affordable Housing Scheme); 25 (Recreation Scheme); 27 (Phasing Plan); 28 (Internal Road Pattern Details); 29 (Scheme of Levels, Drainage & Modelling to support Approved FRA); 31 (FFL's of Dwellings); 32 (River Irwell Buffer Zone Details); 37 (Replacement Cricket Club Facilities); 39 (Highway Details); 40 (Scoot at Water Street); 41 (Parking Strategy); 44 (Travel Plan).

- 2.6 The WSI prepared by WYG was submitted in support of the reserved matters application and GMAAS were consulted by Bury Council with respect to Condition 13. In a consultation response dated 12th January 2024, GMAAS stated that, for the most part, the WSI sets out an appropriate scheme of initial archaeological investigation via evaluation trenching in line with the requirements of Condition 13. Greater Manchester Archaeological Advisory Service did recommend however some updates to that document before 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, e.g. 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'.*

2.7 Greater Manchester Archaeological Advisory Service stated that, while it was mentioned in paragraph 2.23 of the WYG WSI, that a 'small excavation' is required where part of the proposed layout of the cricket pitch intrudes upon the south-west edge of the 'Radcliffe Tower and site of hall 100m south west of the parish church in Radcliffe' scheduled monument (List Entry Number: 1014721), no further information was provided.

2.8 Wardell Armstrong consulted with GMAAS in November 2024, and they recommended that all ground works associated with the new access route to the cricket ground and car park, be undertaken under controlled archaeological conditions, essentially a watching brief, by a suitably qualified archaeologist. The works are to be closely and constantly monitored.

2.9 This addendum addresses the updates to enable GMAAS to recommend partial discharge of Condition 13.

2.10 Historic England were consulted by Bury Council for both the outline and reserved matters planning applications. In their consultation response to the reserved matters application, dated 9th February 2024, they made specific reference to Condition 37:

Notwithstanding the submitted plans and reports, full details of a scheme showing details of the design, layout and specification of replacement playing field provision (of at least equivalent quantity and quality which would be lost or become unusable as a

result of the development) at East Lancs Paper Mill Cricket Club Ground shall be submitted to, and approved in writing by, the Local Planning Authority (after consultation with Sport England) at the first reserved matters stage. The scheme shall include:

- *Details of pedestrian and vehicular access including car parking within the site to the replacement playing field provision;*
- *Details of the design and construction of the clubhouse to meet England and Wales Cricket Board standards;*
- *A written specification of soils structure, cultivation and other operations associated with grass and sports turf establishment based on the results of the assessment carried out pursuant to the feasibility and agronomy report prepared by PSD Agronomy Labosport Group, dated 12th July 2018);*
- *A programme of implementation detailing when the existing playing field provision will be taken out of use, when the replacement playing field and ancillary provision will be implemented; and*
- *A scheme of playing field maintenance and management The approved details shall be implemented in accordance with the approved programme.*

Reason. To ensure there is no loss of recreation facilities pursuant to Policy RT1/1 - Protection of Recreation Provision in the Urban Area of the Bury Unitary Development Plan and Section 8 of the National Planning Policy Framework.

- 2.11 Historic England has no objection to the discharge of Condition 37 but recommended that the applicant be advised to check for the potential requirement for Scheduled Monument Consent (SMC) for planting at the cricket club site.
- 2.12 The Inspector of Ancient Monuments for North West Region at Historic England was consulted by Wardell Armstrong in November 2024, and they advised that SMC is required. They will recommend to the Secretary of State for Culture, Media and Sport that SMC should be granted with a minimum of conditions including notification (to Historic England as administrators of the SMC process) of the start date and photographs of the completed works. Works within the area of the scheduled monument will be monitored under the same archaeological conditions as the works recommended by GMAAS (para: 2.8).

3 ARCHAEOLOGICAL AND HISTORIC BACKGROUND

- 3.1 The WYG WSI outlines the archaeological and historical background and reference to that document should be made. The WSI references a desk-based assessment prepared by Oxford Archaeology North in 2004 (OA North 2004) and Heritage Statement prepared by WYG (WYG 2018). The Heritage Statement was updated in 2023 by RP Heritage (RP Heritage 2023). No additional information to the archaeological and historical background was revealed.

4 STANDARDS AND GUIDANCE

- 4.1 Updated standard and guidance relevant to the work are:

- *Standard and guidance for the creation, compilation, transfer and deposition of archaeological archives (ClfA 2020a);*
- *Standard and guidance for the collection, documentation, conservation and research of archaeological materials (ClfA 2020b);*
- *Standard for archaeological field evaluation (ClfA 2023a);*
- *Universal guidance for archaeological field evaluation (ClfA 2023b);*
- *Standard for archaeological excavation (ClfA 2023c);*
- *Universal guidance for archaeological excavation (ClfA 2023d);*
- *Standard for archaeological monitoring and recording (ClfA 2023e); and*
- *Universal guidance for archaeological monitoring and recording (ClfA 2023f).*

5 METHOD STATEMENT

- 5.1 The methodology for the evaluation is outlined in Section 5 of the WYG WSI and shown on Figure 6 of that document.
- 5.2 Wardell Armstrong, acting as agent for the applicant (Morris Homes), will complete and send application form AM112 for SMC to the Historic England North West Regional Office in advance of any works within the scheduled monument area (Drawing GM13502-A-001) being undertaken. For the avoidance of doubt, no works of any kind, including vegetation clearance and preparatory works, will commence within the scheduled monument area until the SMC application has been granted by The Secretary of State for Culture, Media and Sport.

5.3 Historic England provide documentation to aid the process in the form of *Notes for Applicants* (Historic England 2024) which will be followed. The SMC application will include:

- Applicant details;
- Occupier of the Monument (if not the applicant);
- Monument to which the application relates;
- Description of the proposed works;
- List of plans and drawings accompanying the application; and
- Any other information relevant to the application.

5.4 The SMC application will include a copy of this addendum.

5.5 Wardell Armstrong, acting as agent for Morris Homes, will liaise with Historic England during the application process.

5.6 Following grant of consent, all works within the scheduled monument will be carried out in accordance with any and all conditions attached to the consent and in accordance with the methodology in this addendum.

Archaeological Monitoring

5.7 All works, including within the scheduled monument area, wider car park and access road (Drawing GM13502-A-001) will be subject to close archaeological monitoring by a suitably qualified archaeologist(s).

5.8 The monitoring will cover:

- All wide area ground reduction and grading works including hand and machine excavation;
- All footpath, road and car park ground removal and reduction works;
- All service trenches and other such excavation;
- All tree and vegetation removal with the potential to cause significant ground disturbance; and
- All other below ground works not specified above with the potential to cause significant ground disturbance.

5.9 Mechanical excavation during ground reduction is permitted but **must** be undertaken using **toothless** buckets removing no more than **200mm** of material at any one time

in level spits. This must be closely monitored by an archaeologist(s). No stripped areas will be tracked over by any site machinery.

- 5.10 Recording of features will be made using the same methodology as the WSI (WYG 2019 paras; 5.5 – 5.19).
- 5.11 The construction contractors will allow time for archaeological features to be recorded by an archaeologist in accordance with the methodology outlined in the WSI and this addendum. Once the archaeologist has confirmed that all features have been recorded or there are no features present, work will be allowed to continue. The archaeologist will make every effort to implement the monitoring without disrupting the construction timetable, however, some suspension of groundworks to allow more detailed recording in specific areas may be required. In such cases, the area will be clearly defined on site and fenced if needed.
- 5.12 Where it is demonstrated that there are no archaeological features present or ground conditions are such that the archaeological potential is negligible, the monitoring will either be suspended or reduced/alterd iteratively in scope only following agreement from Historic England and/or GMAAS.
- 5.13 Should remains of potential significance be revealed, any further mitigation will be subject to a separate project design to be agreed in consultation with either Historic England, GMAAS or both.
- 5.14 The construction contractors are responsible for the provision of all plant, welfare, fencing and health and safety during the archaeological monitoring. The archaeological contractor will, however, be responsible for their own RAMS
- 5.15 Historic England and/or GMAAS will be informed in advance with sufficient notice (at least one week) of commencement. They will be given progress reports as work continues, at least on a weekly basis or at such times where archaeological remains of interest are revealed.

6 ARCHIVING

- 6.1 The project will be registered with OASIS, the online system for reporting investigations into the historic environment and linking research outputs and archives. The digital archive of data generated through the archaeological work, including digital copies of reports, CAD files, GIS files, photographs etc. will be submitted to the Archaeological Data Service (ADS) as required.

- 6.2 Upon approval of the report, a digital .pdf copy of the report will be provided to the Greater Manchester HER within 6 months of completion of fieldwork.

7 STAFFING

- 7.1 Wardell Armstrong will be in overall charge of the management of the project on behalf of the Client. The manager in overall charge is experienced in managing projects of this nature and is a member of the Chartered Institute at full MCIfA accreditation level. Wardell Armstrong LLP is a ClfA Registered Organisation.
- 7.2 The archaeological evaluation and monitoring will undertaken by an archaeological organisation that is experienced in industrial archaeology and is a ClfA Registered Organisation. A sub-contractor is yet to be appointed but full details including CVs will be provided upon appointment.

8 BIBLIOGRAPHY

ClfA 2020a. *Standard and guidance for the collection, documentation, conservation and research of archaeological materials*

ClfA 2020b. *Standard and guidance for the creation, compilation, transfer and deposition of archaeological archives*

ClfA 2023a. *Standard for archaeological field evaluation*

ClfA 2023b. *Universal guidance for archaeological field evaluation*

ClfA 2023c. *Standard for archaeological excavation*

ClfA 2023d. *Universal guidance for archaeological excavation*

ClfA 2023e. *Standard for archaeological monitoring and recording*

ClfA 2023f. *Universal guidance for archaeological monitoring and recording*

Historic England 2024. *Scheduled Monument Consent*. Available at: <https://historicengland.org.uk/advice/planning/consents/smc/> (Accessed 11th November 2024)

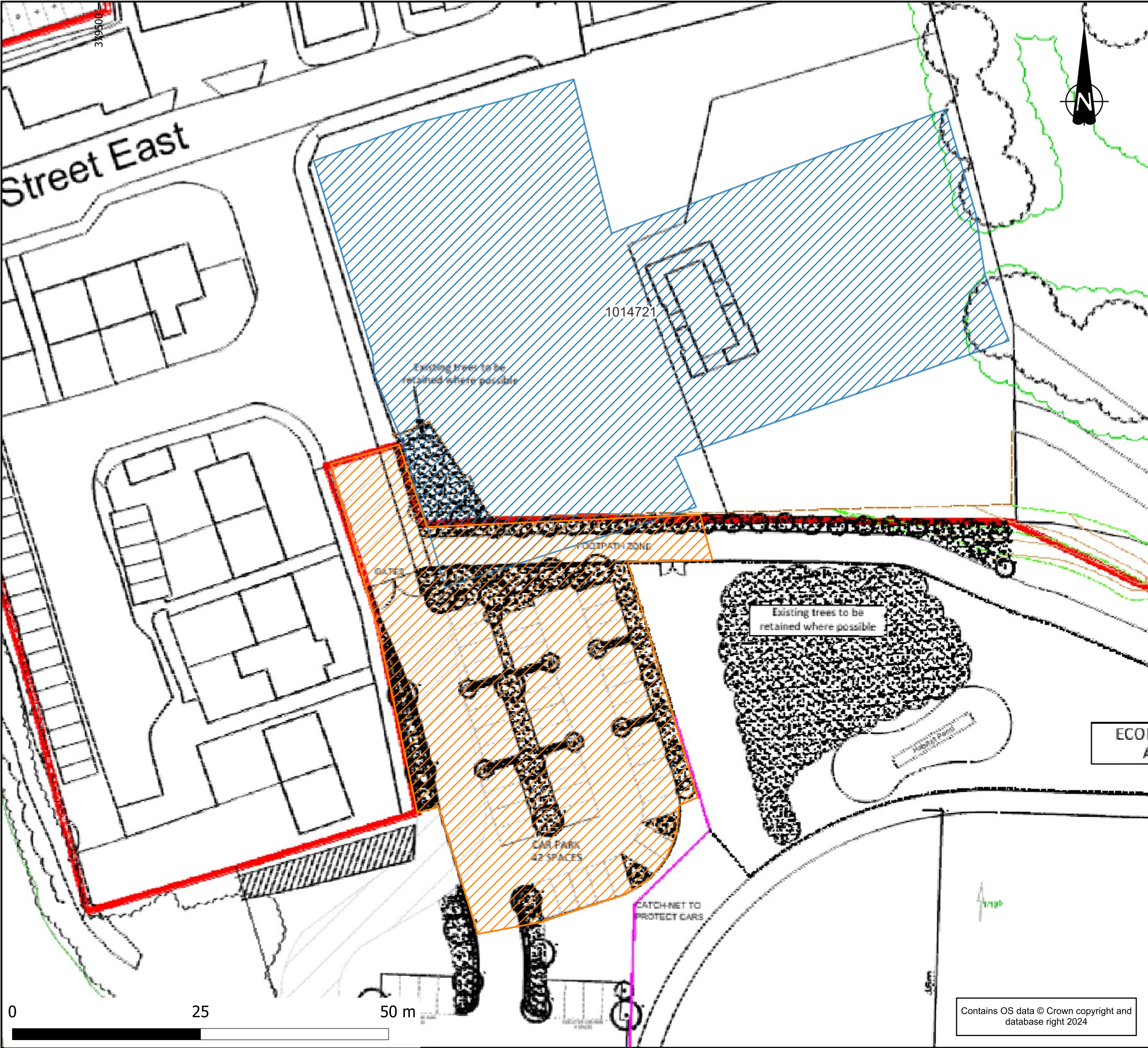
RP Heritage 2023. *Addendum to Heritage Statement: Land at the Former East Lancashire Paper Mill, South of Cross lane, Radcliffe*

WYG 2018. *Former East Lancashire Paper Mill: Heritage Statement*

WYG 2019. *Former East Lancashire Paper Mill, Radcliffe: Archaeological Evaluation Written Scheme of Investigation*

APPENDICES

APPENDIX 1: DRAWINGS



DO NOT SCALE FROM THIS DRAWING

- Key
- Scheduled Monument
 - Archaeological Monitoring Area

REVISION	DETAILS			DATE	DRN	CHKD	APP'D
CLIENT							
Client: Morris Homes							
PROJECT							
East Lancashire Paper Mill							
DRAWING TITLE							
Archaeological Monitoring Area							
DRG No. GM13502-A-001				REV A	SUIT. -		
DRG SIZE A3		1:500		DATE November 2024			
DRAWN MB		CHECKED BY		APPROVED BY			



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