

Memorandum

From	Doug Moir	To	Jonathan Haine
Extension	01772 533361		
Our Ref	LCC_2022_0048-LCC.DM	Your Ref	LCC/2022/0048/JMH
Date	13 th October 2022		

APPLICATION: LCC/2022/0048

**PROPOSED CRICKET FACILITY COMPRISING 2NO. CRICKET OVALS AND ASSOCIATED PAVILION BUILDING AND SPECTATOR SEATING, COVERED CRICKET NETS, ACCESS, PARKING, LANDSCAPING AND ASSOCIATED WORKS (INCLUDING TEMPORARY EVENT OVERLAY FACILITIES ON TICKETED MATCH DAYS), REALIGNMENT OF PUBLIC RIGHT OF WAY REF 9-12-FP 1, 7-4-FP 6 AND PUBLIC RIGHT OF WAY REF 9-12-FP 2, 7-4-FP5
LAND AT WOODCOCK ESTATE, STANIFIELD LANE, FARINGTON
GR: 354744 424731**

The planning application is accompanied by Salford Archaeology's Archaeological Desk-Based Assessment (2022). In the first instance I need to deal with some deficiencies in the DBA.

Salford Archaeology is a Chartered Institute for Archaeology (CIfA) Registered Organisation (RO). CIfA's *Standard and guidance for historic environment desk-based assessment states:*

"3.2.1 Desk-based assessment should be carried out according to a written specification or to a project design agreed by all relevant parties, so that performance and fitness for purpose can be measured."

"3.2.4 The brief/project outline or a specification may be prepared by the commissioning body or their agents, but should be agreed in advance with the planning archaeologist."

"3.3.9 Unless access is restricted, the archaeologist undertaking desk-based assessment should visit the study area in order to assess its character, identify visible historic features and assess possible factors that may affect the survival or condition of known or potential assets. All assessments should include an explicit statement as to whether or not a visit has taken place and, if so, a description of the procedures used and any constraints to observation encountered."

In this instance no such brief was prepared nor were there any discussions with the HET over its content and provisions 3.2.1 & 3.2.4 have therefore not been followed, This has resulted in the DBA being submitted without the results of a site walkover, something that the HET insists accompanied all DBAs, on the basis that the HET (nor its predecessor organisations) have ever had the means to carry out such research, and it is therefore unlikely for the application site to have ever been assessed in the field before.

There is no statement explaining why a site visit was not possible (as required in 3.3.9 of the standard) included within the DBA and the HET therefore remains none the wiser as to why this has occurred. Consequently, whilst the HET is still able to comment on the below-ground archaeological potential of the site, it cannot provide advice concerning the

presence or not, of surviving earthworks or other features such as veteran trees, which may have an archaeological significance.

The Lancashire Historic Environment Record (HER) is listed as one of the sources consulted, it would however normally be expected that all of the information obtained from the HER, not just the 5 sites mentioned in Section 5. Gazetteer of Sites would be included.

There is a general statement concerning the use of "Published and unpublished cartographic, documentary and photographic sources" but those that were consulted are not identified, although it is apparent that the Lancashire Historic Landscape Characterisation Project, in which the application site is identified as being Ancient Enclosure, wasn't such a source. Similarly there is no mention of LIDAR data being used, or the aerial photography collections held by Historic England or Cambridge University being consulted.

Although the application site contains only the following non-designated heritage asset recorded on the Lancashire Historic Environment Record (HER);

PRN1557 – A cropmark at Sherdley's Cottages on a undated (1990s?) Lancaster University Archaeology Unit aerial photograph of the site. The HER record does not include any information as to whether this might relate to the more modern buildings or is indicative of something of much greater age,

a number of areas of archaeological interest dating to the prehistoric, Romano-British (PRNs 26143 & 42290) and medieval periods (PRNs 19296 & 19297), were encountered on the Cuerden Strategic Site, immediately to the east, on the eastern side of the A6. They have been referred to in the DBA, but more recent work at Brookhouse Farm, which in the process of being reported by Salford Archaeology, also encountered evidence for medieval settlement in the form of a series of pits and ditches and pottery. The presence of these previously unknown archaeological sites immediately adjacent to the proposed development is considered to raise its archaeological potential.

It would be safe to say that well-preserved or extensive evidence of activity from the prehistoric and Romano-British periods would be considered to be of regional significance, and would require the need for preservation in situ to then be considered, which might have an impact on the design of the proposals. Where detailed open-area archaeological excavation was considered to be an appropriate mitigation strategy, the results of the evaluation would enable a more informed decision to be reached as to the nature, extent and location of these works, and enable a better assessment of the time and cost for such works to be undertaken on-site and in the post-excavation analysis and reporting stages.

Despite the shortcomings of the Desk-Based Assessment, it does conclude on pp.31-33 that the proposed development site has the potential to address a number of Regional Research Agenda questions for the prehistoric, early and late medieval, Post-medieval and Industrial Periods, which the HET is in agreement with. Paragraph 195 of National Planning Policy Framework is clear that:

"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."

In this instance given the potential for deposits of a high archaeological significance to be encountered, the HET would advise that the County Council currently lacks the necessary information to make a reasoned and informed decision on the archaeological significance of the site, and hence the nature of the impact of the proposed development on the archaeological resource, and that such information, in the form of a suitably updated Desk Based Assessment, along with the results of a field evaluation (a combination of geophysical survey and trial trenching), be required before the application can be determined.

Thank you for your consultation

Doug Moir

For the Head of Service for Planning and Environment