



GMAAS
Greater Manchester Archaeological Advisory Service

Greater Manchester Archaeological Advisory Service
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Rachel Carney
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Number One Riverside
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Date: 24th September 2025

Dear Rachel

Application 25/00680/FUL - Construction and operation of 17 wind turbines with a maximum height to the tip of the blade of 180 metres (above ordnance datum), together with associated ancillary infrastructure comprising crane pads and hardstandings; new access tracks; improvement and widening works to Scout Road; onsite substation; underground electrical infrastructure and cabling; fencing and boundary treatments; external lighting; drainage infrastructure; habitat and moorland restoration works; public right of way works; landscaping; temporary construction compound and staging area; underground electrical grid connection to the Rossendale Bulk Supply Point; and associated engineering works; alongside the retention of and improvements to existing access tracks associated with the existing Scout Moor Wind Farm - Scout Moor Wind Farm, Rochdale

Thank you for consulting GMAAS on the above planning application.

The application site comprises a large area of moorland that forms the north-western part of Rochdale Borough. Much of the area has not benefitted from any extensive archaeological investigation to date, although numerous sites of archaeological interest have been identified and are recorded on the county Historic Environment Record. These include finds spots of Mesolithic, Neolithic and / or Bronze Age flint tools, at least two cairns on Bagden Hillocks of probable Bronze Age date, evidence for late medieval / post-medieval agriculture and the extensive remains of 19th-century quarrying and coal mining. The application site is also traversed by the historic Rooley Moor Road, a cross-moor road with well-preserved stone sett surfaces in several sections along its length, forming a major landscape feature varying in width from 4.5m to 5.5m and raised on an agger up to 1m high. In addition, there is potential for the application area to retain deposits of peat with a potential to yield important palaeo-environmental data.

The application is supported by an archaeological desk-based assessment prepared by AOC Archaeology in June 2025, which utilises the Lancashire and Greater Manchester Historic Environment Records, the National Monument Record, historic mapping, aerial photography, LIDAR survey imagery and grey literature reports to produce a detailed baseline assessment and provide a useful discussion of the site's archaeological background, its potential significance and the harm of development to that significance. A walkover survey was carried out as part of the assessment to verify the results of the desk-based study and identify any additional archaeological features. Whilst this contributed some useful information to the baseline dataset, it was not possible to access all parts of the site / proposed turbine locations.



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The assessment report concludes that the known archaeological interest in the application site warrants further investigation in advance of development. The report also notes that the application site has a high potential for the survival of as yet undiscovered archaeological remains dating to the prehistoric periods, which could include lithic implements or buried features. As noted in the report, 'the importance of any such remains would require further assessment on discovery, but it should be recognised that they have the potential to be of medium or high importance'. This quite rightly raises a potential for uncovering archaeological remains that could prove to be of national significance and worthy of physical preservation, thereby introducing an element of 'archaeological risk' to the proposed construction works. Whilst the NPPF advises the excavation of evaluation test pits or trenches prior to determination in order to reduce such risk, GMAAS accepts that the practical implications of seeking predetermination evaluation for an archaeology of flint scatters and small, ephemeral cut features in the context of the present project would be very difficult.

GMAAS agrees with the report's assessment of known and potential heritage asset significance, and recommends that a staged programme of archaeological work is conditioned upon planning consent, should it be granted, that involves: topographic and earthworks survey and initial intrusive investigation prior to development commencement, and; archaeological monitoring and recording during development ground works. In addition, the archaeology chapter of the Environmental Statement submitted with the application makes a welcome commitment to implementing 'a programme of geoarchaeological investigation in the form of a purposive borehole sampling survey...around Cowpe Moss [in the Lancashire borough of Rossendale] where peat depths are modelled to be in excess of 2m', although it seems that the surviving peat identified within the Rochdale borough only survives to a shallow depth.

The topographic and earthworks survey should aim to build upon the results obtained from the initial walkover survey completed as part of the archaeological assessment, provide a more detailed record of the historic landscape features and mining / quarrying remains. The initial intrusive investigation should include hand-excavated test-pitting specifically targeting the footprints of the proposed wind turbine foundations, associated hardstanding and access roads, together with the mechanical excavation of some larger trenches / 'strip, map and record' areas'. This intrusive investigation would assist in providing an alert to the presence of complex archaeology, allowing decisions to be taken in good time on the need for a mitigation strategy to be formulated. GMAAS advises that provisions are implemented that would allow for the timely recognition of significant archaeological remains and the capacity to allow them to remain *in situ* by making micro-siting adjustments in turbine locations.

Following on from the completion of the initial survey and evaluation, and an assessment of the results, all subsequent groundworks should be subject to close archaeological monitoring and recording with machining levels remaining at or just above the peat / mineral soil interface, with the mineral soils being exposed and cleaned archaeologically by hand.

There is also an opportunity to devise proposals for public outreach benefits relating to the archaeological / historic heritage. GMAAS feels this particularly appropriate regarding the extensive industrial remains that exist in the northern part of the proposed development area and through which the development will pass. The extensive industrial remains in the area are a visible and historically interesting heritage asset. Public interpretation of this asset would contribute towards promoting a legacy of public engagement whilst benefitting heritage, tourism, local education and health agendas. Such interpretation could take the form of history trails, guided tours, information booklets and boards, and local museum displays. Furthermore, should any of the archaeological works result in an open-area excavation there would be an opportunity to involve members of local societies.

Whilst predetermination archaeological investigation represents best practice where a site has potential to contain remains of high significance, GMAAS would be content in this instance to see the archaeological investigation secured through a condition worded as follows:

'No development works shall take place until the applicant or their agents or their successors in title has secured the implementation of a programme of archaeological works in accordance with a Project Design that has been submitted to and approved in writing by the local planning authority. The Project Design shall cover the following:

1. A phased programme and methodology to include:

- a) a topographic and earthwork survey;***
- b) an archaeological evaluation through a combination of hand-excavated test pits and mechanically excavated trenches;***
- c) pending the results obtained from the above, an open-area excavation;***
- d) geoarchaeological assessment of any peat core samples;***
- e) archaeological monitoring and recording during development groundworks.***

2. A programme for post-investigation assessment to include:

- a) analysis of the site investigation records and finds;***
- b) production of a final report on the significance of the heritage interest recorded.***

3. Deposition of the final report with the Greater Manchester Historic Environment Record.

4. Dissemination of the results of the site investigation commensurate with their significance.

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 works set out within the approved Project Design.

Reason: To protect the significance of any archaeological remains on the site in accordance with Policy P2 of the adopted Rochdale Core Strategy, and Policy 218 of the National Planning Policy Framework: 'To record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence (and any archive generated) publicly accessible.'

The work should be carried out by an appropriately qualified contractor, funded by the applicant. GMAAS will be pleased to monitor the implementation and progress of the archaeological works on behalf of Rochdale Borough Council.

Yours sincerely



Ian Miller BA FSA

Heritage Management Director

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