



GMAAS
Greater Manchester Archaeological Advisory Service

Greater Manchester Archaeological Advisory Service
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Mr N. Brookman
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Date: 9th September 2026

Dear Nick

RE: Application PL/2026/0380 - Section 73 application to vary conditions 3 (Crimble Hall Works Methodology), 4 (Proposed Materials), 5 (Contamination), 6 (CEMP), 7 (WSI), 8 (Condition Survey), 9 (Foul Water), 10 (Surface Water), 11 (Tree Protection), 12 (Soft Landscaping), 13 (Bat Survey), 16 (EV Charging), and 17 (Parking Areas) of planning permission 21/00092/FUL (Partial demolition of former restaurant and bar and conversion and change of use to residential dwelling (C3), and the erection of 5 dwellings (C3), along with access, service routes, hard and soft landscaping and associated works) of planning permission 21/00092/FUL - The Crimble Restaurant, Crimble Lane, Heywood, Rochdale.

Thank you for consulting GMAAS on the above application to vary Condition 7 attached to planning consent 21/00092/FUL. This condition was attached in line with advice provided by GMAAS in response to the original planning application in 2022 and states:

'No demolition (excluding a 'soft strip') or development works shall take place until a Written Scheme of Investigation [WSI] has been submitted to and approved by the Local Planning Authority. The WSI shall cover the following:

1. A phased programme and methodology to include:
 - a) a historic building survey (Historic England Level 2/3);
 - b) an archaeological evaluation through trial trenching;
 - c) pending results of the above, targeted open-area excavation and recording.
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 investigations 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 WSI.'

The current application is supported by numerous documents, including a Heritage Assessment prepared by Garry Miller in July 2026 and a report on the Phase 2 Site Investigation that is dated March 2026. Disappointingly, these documents indicate that development works have commenced without a Written Scheme of Investigation (WSI) for appropriate archaeological works having been agreed, or even drafted, as required by Condition 7.



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The Heritage Assessment has been prepared primarily to make a case for removing Condition 7 and dispensing with the requirement for any further archaeological recording and investigation. The report contends that 'the existence of a detailed 2022 Heritage Statement and successive phases of late 20th century ground disturbance on the site which would have affected its archaeological (*sic*) potential' render the imposition of Condition 7 'unnecessary, disproportionate and unreasonable'. It is argued that sufficient understanding of the significance of Crimble Hall has already been presented and that further work would not materially add to an understanding of the property. It is emphasised that the Heritage Statement dated January 2021 and submitted in support of the original application provided a detailed written, drawn and photographic record of the building, broadly commensurate with a Level 2/3 historic building survey.

GMAAS agrees that the Heritage Statement prepared in 2021 is indeed a robust document that provides a reasonably thorough record of the building as of October 2020, but also notes that paragraph 1.5 in the report stresses 'this statement is not intended to be a full or complete record of the site'. It is evident from the content of the Heritage Statement, moreover, that a few details pertaining to the building's development remained uncertain and required clarification via further examination following a 'soft strip' / removal of modern wall finishes in order to elevate the report to a Level 2/3 historic building survey, which would represent an appropriate record of the non-designated heritage asset.

The Heritage Assessment submitted with the current application provides some useful new evidence for the development of Crimble Hall, including 20th-century architects' drawings, details of the roof trusses, and images of the interior walls following the recent full 'soft strip' that appear to confirm minimal survival of historic fabric of interest. GMAAS accepts that these additional details coupled with the information provided in the original Heritage Statement constitute an adequate record of Crimble Hall, broadly commensurate with a Level 2/3 historic building survey, and whilst the approach taken is contra to the pre-commencement requirements of Condition 7, acknowledges that Part 1a of the condition is not now entirely necessary.

Part 1b of Condition 7 requires some intrusive archaeological investigation in advance of development construction work. This is required in the first instance to establish the presence, extent, date and significance of any remains of archaeological interest that may survive below ground and the potential impact of development on these remains. At present, there is insufficient information available to make an informed decision as to whether an archaeological mitigation strategy (Part 1c of Condition 7) warrants implementation. This is highlighted in the archaeological desk-based assessment that the applicant submitted in support of planning application 21/00092/FUL, which recommended that archaeological evaluation trenching was warranted. GMAAS agreed with that conclusion in 2022 and is still of the same opinion.

The Heritage Assessment submitted with the current application implies that the conclusions drawn from original archaeological assessment were flawed and rather glibly argues that the site was subject to several phases of development in the later 20th century that will have removed any archaeological interest. No supporting details or evidence is provided, which may reflect a lack of understanding of archaeological matters. Conversely, the images of the excavated trial pits included in the Phase 2 Site Investigation report show undisturbed soil horizons and what appear to be historic structural remains, reinforcing the need for formal archaeological evaluation. As such, GMAAS cannot accept the argument set out in the Heritage Assessment and recommends that further archaeological investigation of the site is carried out at the earliest opportunity, in line with Part 1b of Condition 7. In the first instance, however, a WSI setting out the methodology for the work will need to be prepared and submitted for approval prior to any further groundworks.

In summary, GMAAS would be content to dispense with Part 1a of Condition 7, but advises that all other parts are appropriate, proportionate and entirely reasonable. The wording of the condition could be amended to:

'No further 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 Written Scheme of Investigation (WSI) which has been submitted to and approved in writing by the local planning authority. The WSI shall cover the following:

1. A phased programme and methodology to include:

- a) an archaeological evaluation;***
- b) pending results of the above, targeted open-area excavation and recording.***

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 investigations 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 WSI.

The submission of a WSI for the archaeological works should be progressed at the earliest opportunity. Once that document has been approved, GMAAS will be pleased to monitor the progress of the archaeological works on behalf of Rochdale Borough Council.

Yours sincerely



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Heritage Management Director

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