



Historic England

Ms Rachel Carney
Rochdale Borough Council
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Direct Dial: 0161 242 1412

Our ref: P01597323

2 October 2025

Dear Ms Carney

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**SCOUT MOOR WIND FARM, ROCHDALE
Application No. 25/00680/FUL**

Thank you for your letter of 26 August 2025 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The application is for the construction and operation of 17 wind turbines with a maximum height to the tip of the blade of 180 metres, together with associated ancillary infrastructure.

The application is supported by an Environmental Statement (ES) which contains a number of sections which deal with topics which fall within the statutory remit of Historic England. Each chapter is supported by appendices. In each case, the chapters and their supporting appendices appear to have been compiled in accordance with current best practice and to have consulted all relevant sources of information. The study areas identified in each case appear appropriate for the identification of significant impacts resulting from the construction and operation of the proposed development.

The ES identifies potential harm to landscape character and visual amenity over a wide area. It suggests that the most significant effects would be confined to the local area. It also suggests that though there would be a degree of harm to the settings of designated and undesignated heritage assets over a wide area, significant impacts would be limited to a small number of designated and undesignated heritage assets.

The application site consists of a large area of upland moorland, with extensive peat



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deposits. Whilst individual known archaeological features are largely of low significance, together they form a record of human exploitation of a major area of upland landscape over a period of thousands of years, and their cumulative significance is high. Little detailed field survey has been carried out within the application site, and the potential therefore exists for further archaeological remains, as yet unidentified, of all periods, to survive within it. There is also potential for preserved palaeoenvironmental material to survive within the application site and in the area around it.

To mitigate the impact of the proposed development upon archaeological and palaeoenvironmental remains, a range of measures is proposed. The National Planning Policy Framework (NPPF) recommends that assessment and evaluation of potential archaeological remains should be carried out in advance of the determination of an application for planning permission, to reduce the risk of damage occurring to significant sites. Given the nature and scale of the application site, it would not be practical to undertake predetermination evaluation. Historic England broadly agrees with the applicant's assessment of the known and potential significance of heritage assets within the application site, and recommends that, should planning permission be granted, a phased programme of archaeological work should be secured by condition. The details of the phased programme of archaeological work should be set out in a Written Scheme of Investigation, to be approved in writing by your authority in consultation with The Greater Manchester Archaeological Advisory Service.

The ES also commits the applicants to implementing a programme of geoarchaeological investigation in the form of a purposive borehole sampling survey around Cowpe Moss. A study of this nature, which should be undertaken under the direction of a palaeoenvironmental specialist with experience of upland moorland landscapes, could form a mitigation for the loss of peat due to the scheme. We would welcome further consultation on the design of such a programme.

The ES has identified the possibility of changes in drainage patterns to affect ground saturation levels which may result in the deterioration of peat deposits. The indirect impacts of any drainage works on the preservation of archaeological deposits needs to be acknowledged during mitigation. If the palaeoenvironmental study indicates deposits which are of such rarity that preservation in situ should be undertaken then this may need to be considered as part of a long term management plan.

The ES identifies that changes to the natural drainage and runoff rates could affect the hydrological continuity within areas of the peat. It may be necessary to monitor water levels to confirm drainage designs do not negatively impact on the archaeological resource. This could form part of the hydrological management and water table monitoring, as well as the prescription for increasing water levels set out in the final version of the Peat Management Plan. This would benefit both the preserved



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archaeological remains and the peat deposits which this project aims to protect and enhance.

While it is not possible to mitigate the landscape and visual impacts of the proposed development, the measures proposed by the applicants, together with the additional ones recommended above, would go some way towards mitigating the direct impacts of the proposed development. Historic England has concerns about the impact of the proposed development upon the historic environment, but the implementation of the recommended package of mitigation measures would go some way towards alleviating them. The proposed development would still cause harm to the historic environment, but the level of harm would be rather less than significant. It would be for your authority to decide whether the level of harm which the proposed development would cause to the historic environment would be outweighed by the public benefits which are claimed for it

Historic England Advice

The application is for the construction and operation of 17 wind turbines with a maximum height to the tip of the blade of 180 metres, 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.

Historic England is the Government's statutory advisor on the historic environment. The application is supported by an Environmental Statement (ES) which contains a number of sections which deal with topics which fall within the statutory remit of Historic England. These are 11 ('Landscape and Visual'), 12 ('Built Heritage'), 13 ('Archaeology') and 14 ('Hydrology, Hydrogeology and Peat').

Each chapter is supported by appendices. Those of particular relevance are Appendices 12.1 (Heritage Assessment), 13.1 (Archaeological Desk Based Assessment), 14.2 (Peat Survey Report) and 14.3 (Outline Peat Management Plan). In each case, the chapters and their supporting appendices appear to have been compiled in accordance with current best practice and to have consulted all relevant sources of information. The study areas identified in each case appear appropriate for the identification of significant impacts resulting from the construction and operation of the proposed development.



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The ES identifies potential harm to landscape character and visual amenity over a wide area. It suggests that the most significant effects would be confined to the local area (within a radius of 3km of the application site), with medium scale effects up to 8km, and small-scale effects up to 15km.

Chapter 12 ('Built Heritage') suggests that though there would be a degree of harm to the settings of designated and undesignated heritage assets over a wide area, significant impacts would be limited to a small number of Grade II listed buildings, three conservation areas, a Grade II registered park and garden, and some undesignated heritage assets, notably the Rooley Moor Road (also known as the 'Cotton Famine Road').

Whilst Chapters 11 and 12 deal with impacts to the settings of designated and undesignated heritage assets, Chapters 13 and 14 address potential direct impacts to both known and unknown archaeological assets within the application site itself as well as to peat deposits containing important palaeoenvironmental material both within the application site and in the area around it.

The application site consists of a large area of upland moorland, with extensive peat deposits. Known archaeological remains include flint scatters of Mesolithic and Neolithic date, cairns of probable Bronze Age date, evidence for medieval and post-medieval agriculture, and much evidence for post-medieval coal-mining and quarrying. The most impressive surviving landscape feature is the Rooley Moor Road which crosses the application site. Whilst individual known archaeological features are largely of low significance, together they form a record of human exploitation of a major area of upland landscape over a period of thousands of years, and their cumulative significance is high. Whilst Historic Environment Records contain considerable evidence for archaeological features of all periods, it is acknowledged in Appendix 13.1 that little detailed field survey has been carried out within the application site. The potential therefore exists for further archaeological remains, as yet unidentified, of all periods, to survive within it.

There is potential for preserved palaeoenvironmental material to survive within the application site and in the area around it, with evidence from a number of locations in the vicinity of the application site for the preservation of pollen and plant macrofossils due to waterlogging. Evidence suggests that there is a broad variation in peat depth across the scheme, with depths varying from bare rock with no peat, to peat depths of over 3 metres. The borehole survey reported in Appendix 14.2 provides an extensive dataset for the entire moor, indicating that it is heavily degraded with a number of pockets of deeper peat. There is clearly potential to uncover significant palaeoenvironmental deposits during the construction phase of the proposed





development.

To mitigate the impact of the proposed development upon archaeological and palaeoenvironmental remains, a range of measures is proposed. These include retention of a number of known archaeological assets through avoidance and demarcation; localised site clearance in areas such as the temporary laydown area and construction compound, substation site access tracks and crossings, and the wind turbine locations with associated hardstandings; the employment of floating road construction techniques where new tracks are proposed across areas of deep peat; avoidance of areas where the peat depth exceeds 1m for the siting of wind turbines and infrastructure; and the limitation of vehicle crossings of the Rooley Moor Road. Areas where the deepest peat is known to survive would be avoided, and an Outline Peat Management Plan prepared.

The National Planning Policy Framework (NPPF) recommends that assessment and evaluation of potential archaeological remains should be carried out in advance of the determination of an application for planning permission, to reduce the risk of damage occurring to significant sites. Given the nature and scale of the application site, it would not be practical to undertake predetermination evaluation. Historic England broadly agrees with the applicant's assessment of the known and potential significance of heritage assets within the application site, and recommends that, should planning permission be granted, a phased programme of archaeological work should be secured by condition. The details of the phased programme of archaeological work, which could potentially include topographic and earthwork survey, plus trial trenching in advance of the commencement of works, and archaeological monitoring and recording during the construction phase of the proposed development should be set out by the applicants in a Written Scheme of Investigation, to be approved in writing by your authority in consultation with The Greater Manchester Archaeological Advisory Service.

The ES also commits the applicants to implementing a programme of geoarchaeological investigation in the form of a purposive borehole sampling survey around Cowpe Moss. A study of this nature, which should be undertaken under the direction of a palaeoenvironmental specialist with experience of upland moorland landscapes, could form a mitigation for the loss of peat due to the scheme and would widen our knowledge of the evolution of the moor through time. We would welcome further consultation on the design of such a programme.

The ES has identified the possibility of changes in drainage patterns to affect ground saturation levels which may result in the deterioration of peat deposits. The indirect impacts of any drainage works on the preservation of archaeological deposits needs to be acknowledged during mitigation. If the palaeoenvironmental study indicates



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deposits which are of such rarity that preservation in situ should be undertaken then this may need to be considered as part of a long term management plan. Please see our guidance on water monitoring and preserving archaeological remains: <https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>.

Chapter 14 of the ES identifies that changes to the natural drainage and runoff rates could affect the hydrological continuity within areas of the peat, and if unmanaged can lead to desiccation or oxidation of peat soils. As no hydrological modelling has yet been undertaken for this assessment and if surveys identify significant archaeological deposits, it may be necessary to monitor water levels to confirm drainage designs do not negatively impact on the archaeological resource. This could form part of the hydrological management and water table monitoring, as well as the prescription for increasing water levels set out in the final version of the Peat Management Plan. This would benefit both the preserved archaeological remains and the peat deposits which this project aims to protect and enhance.

While it is not possible to mitigate the landscape and visual impacts of the proposed development, including those on the settings of designated and undesignated heritage assets, the measures proposed by the applicants, together with the additional ones recommended above, would go some way towards mitigating the direct impacts of the proposed development upon archaeological remains and palaeoenvironmental deposits. Historic England has concerns about the impact of the proposed development upon the historic environment, but the implementation of the recommended package of mitigation measures would go some way towards alleviating them. The proposed development would still cause harm to the historic environment, but the level of harm would be rather less than significant. It would be for your authority to decide whether the level of harm which the proposed development would cause to the historic environment would be outweighed by the public benefits which are claimed for it.

Recommendation

Historic England has concerns regarding the application on heritage grounds. These could, to an extent, be alleviated by the adoption of the mitigation measures recommended above, particularly the implementation of a phased programme of archaeological works in advance of, and during the construction of the proposed development.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely



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