

Heritage Impact Assessment

**BESS at Ellen Road Farm, Bentgate
Street, Rochdale**





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This assessment follows Historic England’s Conservation Principles guidance; Historic Environment Good Practice Advice: 2 Managing Significance in Decision-Taking in the Historic Environment; and 3 The Setting of Heritage Assets; and Historic England Advice Note 12: Statements of Heritage Significance.

Revision Record					
Rev	Description	Date	Author	Checked	Approved
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1. Introduction

1.1 This Heritage Impact Assessment has been prepared by ELG Heritage to accompany an application for a 30 megawatt (MW) BESS at Ellen Road Farm, Bentgate Street, Newhey Rochdale.

1.2 ELG Heritage are commissioned by Root Power to advise on the significance of the heritage assets that may be affected by the development and the impact of the proposed works upon their setting. This report does not consider below ground heritage assets / archaeology.

1.3 The objective of this assessment is to demonstrate a thorough understanding of the heritage assets affected and to explain how the works impact upon their significance and setting.

1.4 The aims of this assessment are:

- To identify the assets which could be affected by the proposed development;

- To consider the significance and setting of the identified heritage assets;
- To demonstrate how the proposal has explored ways to maximise enhancement and minimise harm;
- To assess the effects of the proposed development on the significance of the identified heritage assets; and
- To consider the appropriateness and acceptability of the scheme in light of the current legislation and policy relevant for decision making.

1.5 The assessment identifies the heritage assets surrounding the application site, including Listed Buildings, Conservation Areas, non-designated heritage assets, Scheduled Monuments, Registered Parks and Gardens, and special landscape areas. The zone of interest has been established based on information gained during the site visit and professional judgement.

1.6 This assessment has included the following:

- Identification of any designated or non-designated heritage assets potentially affected by future development;

- Research to obtain information from historic maps, documents and secondary sources relating to identified heritage assets;
- Review of the Historic Environment Record (HER) for designated and non-designated heritage assets;
- Consultation of Historic England's National Heritage List;
- A walk-over survey of the Site and the surrounding area;
- Assessment of the potential impacts, both direct and indirect (due to change within an asset's setting) that development (as known) will have on the significance of the heritage assets;
- Consultation of local and national planning policy and guidance pertaining to heritage

2. Site and Surroundings

- 2.1 The application site is part of an existing agricultural field parcel lying to the north west of Ellen Road Farm, situated to the south of the M62 near the settlement of Newhey.
- 2.2 The site lies with agricultural fields to the south and west with the M62 junction directly to the north west. The northwestern and southern boundaries of the site are formed by post and rail and barbed wire fencing, while there are no physical boundaries on the southwest, northeast and southeast sides of the Site.
- 2.3 To the northeastern boundary outside of the site are three lorry carriages used as billboards. Immediately to the northwest of the Site is a bank which borders the M62 motorway; this is interspersed with scrub planting.
- 2.4 There is commercial development some distance to the east and residential properties located further to the south east at a significant distance from the site.



Figure 1 Wider application site context (site position annotated by star).

3. Development proposals

- 3.1 The application seeks planning permission for the development of a 30MW BESS system with associated infrastructure including compound fencing an access road and associated site welfare office and sub station.
- 3.2 The battery units themselves will lie parallel to the M62 which lies to the north with access to the site taken from the west of Ellenroad Farm.

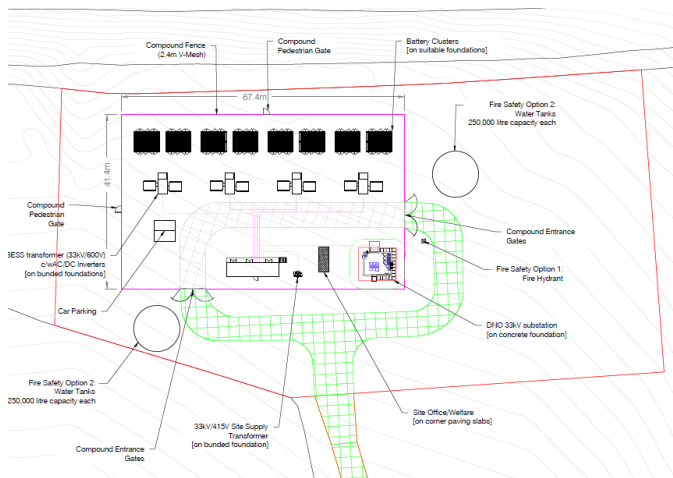


Figure 2 Proposed site layout plan

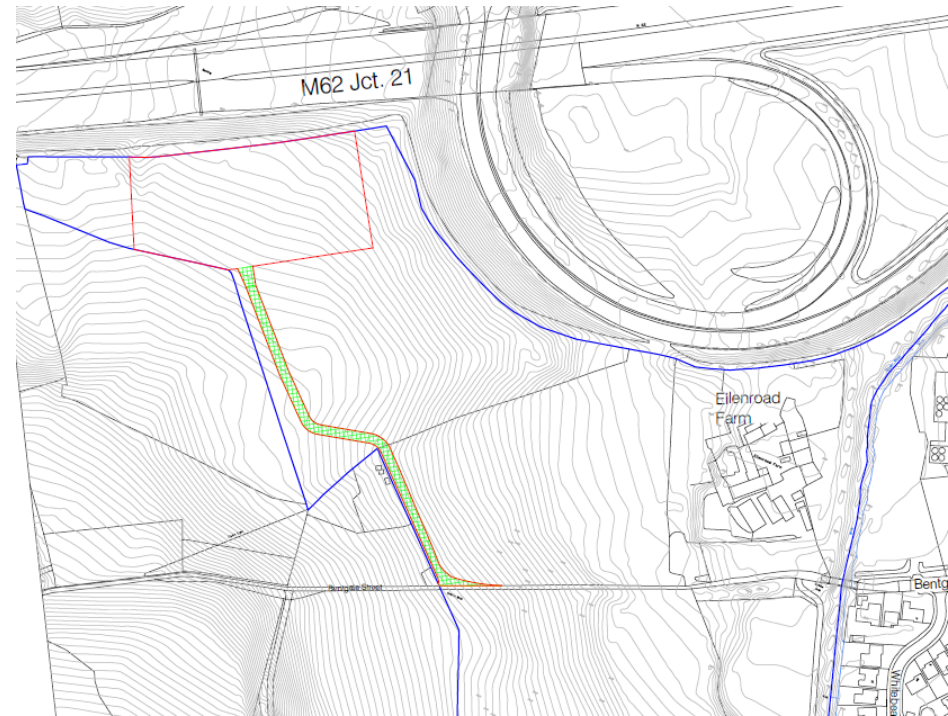
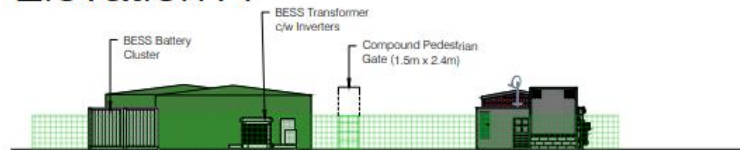


Figure 3 Wider site context

Elevation A



Elevation B



Elevation C



Elevation D

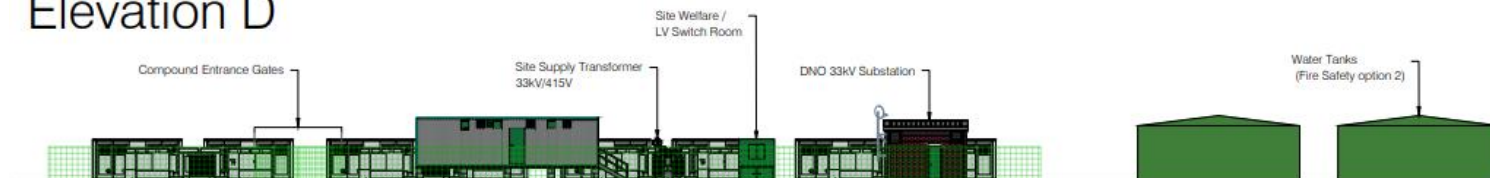


Figure 4 Proposed elevations of BESS apparatus

4. Decision Taking Framework

Planning (Listed Buildings & Conservation Areas) Act 1990

- 4.1 Listed buildings are protected under the Planning (Listed Buildings and Conservation Areas) Act 1990 and are recognised to be of special architectural or historic interest. Under the Act, planning authorities are instructed to have special regard to the desirability of preserving a Listed Building, its setting, or any features of special architectural or historic interest which it possesses.

National Planning Policy Framework (NPPF)

- 4.2 The NPPF requires that *‘in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting’* (Paragraph 194). This Heritage Assessment aims to provide sufficient information for the significance of the heritage

assets in the vicinity of the site and the impact of development to be properly considered.

- 4.3 The NPPF states that *‘when considering impact upon significance, great weight should be given to the asset’s conservation, relative to its significance. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance’* (Paragraph 199).
- 4.4 *‘Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm will require clear and convincing justification’* (Paragraph 200). Any harm to the architectural or historic interest, or the setting of the asset will need to be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Historic England Conservation Principles (2008)

- 4.5 Historic England Conservation Principles (2008) recognises that each generation should shape and sustain the historic environment in ways that allow people to use, enjoy and benefit from it, without compromising the ability of future generations to do the same. To understand the significance of place, Conservation Principles requires an understanding of the archaeological, historical, architectural and aesthetic interests of the heritage assets affected by such a proposal.

Development Plan Policies

- 4.6 The adopted Development Plan for the area comprises the following:

Rochdale Adopted Core Strategy 2016

Core Strategy P2 Protecting and enhancing character, landscape and heritage

1. We will protect and enhance the borough's character, the distinctiveness of its town centres, housing areas and countryside, and the qualities of its landscapes, utilising the considerable potential of these assets in development and regeneration schemes. We will do this by:
 - a. Requiring new development to integrate successfully with the key natural features of the borough, e.g. river valleys and the Pennine landscape;
 - b. Requiring new development to take opportunities to protect and open up important views of hills and valleys which are part of the borough's unique character;
 - c. Restoring the River Roch and other water bodies to their place as key and attractive features of the borough, including opening up waterways where they have been covered, and enhancing their setting, heritage assets and biodiversity potential;
 - d. Protecting, enhancing and utilising outstanding cultural landscapes, such as the Cheesden Valley area and around Littleborough and Hollingworth Lake; and
 - e. Conserving and enhancing townscape character.
2. We will protect the borough's heritage by Conserving, enhancing and promoting key heritage assets, both statutory and non

statutory, including consideration of their wider settings. Key heritage assets of the borough include:

- i. Four outstanding conservation areas: Central Rochdale, Middleton and Littleborough town centres and Rock Nook / Summit;
 - ii. Other designated assets such as listed buildings, conservation areas, registered parks and scheduled ancient monuments;
 - iii. The heritage of the Co-operative movement, the Rochdale Pioneers and the Labour movement;
 - iv. The Edgar Wood and J. H. Sellers cultural heritage;
 - v. The heritage of the seventeenth and eighteenth century vernacular tradition; and
 - vi. The engineering heritage, including mills, canals and railways.
- b. Conserving, enhancing and utilising other non-statutory heritage assets of local interest, be they buildings, parks, gardens or archaeological sites, including promoting their sensitive restoration; c. Using heritage assets positively and intelligently to strengthen identity and image and support the visitor economy, particularly in development and regeneration schemes; and
- d. Prioritising the conservation of heritage assets at risk from decay, giving special attention to designated heritage assets in this regard.

G3 - Renewable and low carbon energy developments

The Council will promote renewable, low and zero carbon energy generating developments, including wind power, biomass, Combined Heat and Power (CHP), hydro and heat pumps in order to help meet CO2 reduction targets and contribute towards energy security for Greater Manchester and the North West.

Any proposal and associated infrastructure must avoid harm to the health and safety of the public, including through nuisance or adverse impact on highway safety by conflict with or undue distraction to road users. Any harm to the following must be minimised and appropriately mitigated:

- The visual character and quality of the landscape or townscape and the physical record of the historic and cultural evolution of the landscape;
- The setting of heritage assets including Scheduled Ancient Monuments, Conservation Areas and Listed Buildings;

5. Understanding Significance

5.1 Significance is the concept that underpins current conservation philosophy. The significance of heritage assets is defined in the National Planning Policy Framework as *‘the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.’*

5.2 Historic England states in its *‘Advice Note 12: Statements of Heritage Significance’* that the requirement set out in the NPPF for an understanding of significance must stem from the interest(s) of the heritage asset, whether archaeological, architectural, artistic or historic, or a combination of these; and that this understanding:

- must describe significance following appropriate analysis, no matter what the level of significance or the scope of the proposal;

- should be sufficient, though no more, for an understanding of the impact of the proposal on the significance, both positive and negative; and
- sufficient for the LPA to come to a judgement about the level of impact on that significance and therefore on the merits of the proposal.

5.3 It should be noted that the varied nature of heritage assets means that, in the majority of cases, they are unsuitable for assessment via a nominally ‘objective’ scoring of significance, and there will always be an element of interpretation and professional judgement within a balanced assessment.

5.4 When defining the contribution of setting to an asset, the assessment begins with identifying the significance of a heritage asset as described above.

5.5 As outlined in Historic Environment Good Practice Advice in Planning: Note 3 The Setting of Heritage Assets (Historic England 2017), setting is defined as *‘the surroundings in which an asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a*

positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral.’ A recommended staged approach to the assessment of potential effects on the setting of heritage assets is also set out in the guidance.

5.6 Assets of the highest significance (Paragraph 200 of the NPPF) include:

- Scheduled Monuments;
- World Heritage Sites; protected wreck sites and registered battlefields;
- Grade I and Grade II* listed buildings and
- Grade I and Grade II* Registered Parks and Gardens.

5.7 Assets of high significance include:

- Grade II listed buildings,
- Grade II Registered Parks and Gardens.

5.8 Designated assets also include conservation areas.

Considering Harm

5.9 The courts have held that preserving means doing no harm. They have further established that, where a proposal will cause a degree of harm, the desirability of preserving a listed building or its setting, or character of a conservation area should not simply be given careful consideration, *‘but should be given “considerable importance and weight”* in the planning balance.

5.10 Historic England define harm as *‘change for the worse, here primarily referring to the effect of inappropriate interventions on the heritage values of place’* (Conservation Principles, p71).

5.11 The National Planning Policy Framework confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be).

5.12 Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or

substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (Paragraphs 194 to 196) apply.

- 5.13 Substantial harm is not specifically defined in the NPPF, but the Planning Practice Guide sets out that, in general terms, substantial harm is '*a high test, so it may not arise in many cases.*'
- 5.14 The NPPF requires that where development will lead to less than substantial harm to a designated heritage asset, this harm should be weighed against the public benefits of a proposal.
- 5.15 The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining an application. In weighting applications that directly or indirectly affect non-designated heritage assets, Paragraph 203 of the NPPF sets out that a balanced judgement will be required having regard to the scale of any harm or loss to the significance is unknown.

6. Historic Context

- 6.1 Historically part of Lancashire, Newhey was a hamlet within the township of Butterworth. It was described in 1828 as "consisting of several ranges of cottages and two public houses". In the early 19th century, a major road was built through Newhey from Werneth to Littleborough. Newhey was incorporated into the Milnrow Urban District in 1894. There were five mills recorded in Newhey in 1920: including Ellenroad, Newhey, Coral, Haugh and Garfield.
- 6.2 The Rochdale Canal opened in 1804, providing a broad canal link across the Pennines and consequently became an important transport corridor. The canal started at the Bridgewater Canal, linked with the Ashton Canal, and passed through Ancoats, Droylsden, Moston, Middleton and Chadderton before passing to the south of Rochdale and the north of Milnrow and Newhey, towards Todmorden.
- 6.3 The tithe plan of 1853 and subsequent ordnance survey plans show the application site remaining in agricultural use despite the growth

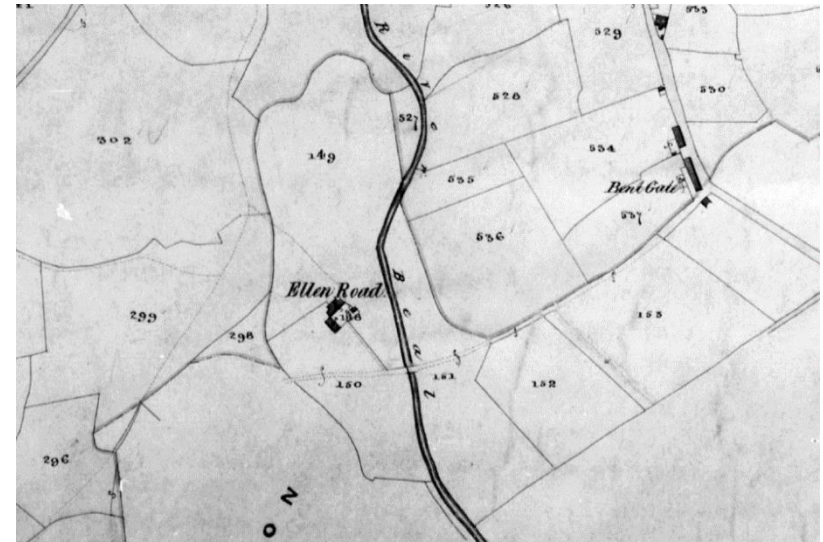


Figure 5 Tithe Plan of 1853

associated with mill and railway development, which arrives to the east in the late 1800's.

- 6.4 The canal carried coal and cotton to the mills, and the completed yarn to the weaving sheds and it provided an axis for the development of the cotton industry. Newhey was 3 km from the canal and was late in building cotton mills. More significantly the Lancashire and Yorkshire Railway built the Oldham Loop Line through Milnrow and Newhey in 1863.

- 6.5 Rochdale was a prime site for cotton spinning in 1890. It was conveniently located for the coal fields and the railways and canal made the importation of cotton easy.
- 6.6 Ordnance survey plans from the 1893 show the site of two large Mill complex Ellenroad Mill and Garfield Mill located to the east, Ellen Road farm remains visible to the south of the site.



Figure 6 Ordnance Survey Plan of 1893

7. Heritage Assets

- 7.1 There are no built structures within the site or heritage assets within the site itself which is part of a field, sitting within a wider agricultural context.
- 7.2 A search of the Manchester Historic Environment Record undertaken by Pre Construct Archaeology as part of the accompanying archaeological desk based assessment (August 2024), identifies that there are two Conservation Areas, one Scheduled Monument and seven Grade II Listed buildings and monuments within the 1km study radius, though these are located some distance from the Site. There are a number of archaeological finds within the study area and these are considered in detail within the associated DBA. This report does not consider the potential impacts on any underground assets.
- 7.3 In respect of built heritage asset identified, those within the study area with the potential to be impacted by the development are identified and discussed in turn, following the stepped process set out in Historic England's GPA 3 The Setting of Heritage Assets.
- 7.4 There is a Grade II Listed Farmhouse to the south and a scheduled monument to the east of the site. The impact on these built heritage assets is considered further in turn.
- ### Ellenroad Ring Mill
- Scheduled Monument List entry number 1001958**
- 7.5 Ellenroad Mill was a cotton spinning mill in Newhey, a village in the Milnrow area of Rochdale. The mill was constructed as a mule spinning mill in 1890 by Stott and Sons and extended in 1899.
- 7.6 The design was for a conservative five-storey 40-bay mule spinning mill, with detached engine and boiler houses, driving the line shafts by means of a rope drive. For the steam engine they went to the local firm of J & W McNaught and chose a single triple-expansion horizontal engine, which in 1890 produced the greatest efficiency in terms of power per ton of coal. The steam was raised by five Lancashire boilers and these required a 220 ft chimney to provide the draught. The chimney remains a landmark feature and is visible from the application site.



Figure 7 View of the scheduled mill site from the application site

- 7.7 The mill was destroyed by fire on 19 January 1916 and when rebuilt it was designed and equipped as a ring spinning mill. The industry peaked in 1912 when it produced 8 billion yards of cloth; The First World War of 1914–18 halted the supply of raw cotton; and the British government encouraged its overseas colonies to build mills to spin and weave cotton. The war over, Lancashire would never regain its markets.

- 7.8 The mill continued to spin cotton into the 1980s. The mill was electrified in 1975, and the engines fell silent but remained intact. Most of the Ellenroad Mill building was demolished after closure in 1982, but the engine house and large steam engine and boiler house chimney were retained. The mill is now operated as a museum by the Ellenroad Trust with the steam engines being brought into use for public demonstrations to showcase the industrial heritage.

Significance and Setting

- 7.9 Most of the Ellenroad Mill building was demolished after closure in 1982. The significance of the monument is considered to lie in its testament to historic industrial practices, with his adaptation and change in internal machinery reflective of changing industrial processes.
- 7.10 The retained buildings have a degree of both architectural and historic interest and help to understand the scale and form of the previous mill complex.

- 7.11 The scheduling also reflects the increasing rarity of the building typology both locally and in a wider national context.

Contribution of the site to setting/significance

- 7.12 The site is considered to form a small part of the wider incidental rural landscape to the hinterland lying to the west of the settlement and situated some distance from the scheduled site. The heritage asset forms a landmark structure in the wider surrounding landscape due to its height, scale and form. Due to its visual prominence and tall chimney structure it is visible in many vantage points throughout the immediate surroundings and from further afield. The stack serving as an important visual reminder in the landscape of historic industrial use within the area.
- 7.13 Whilst the monument is visible from the application site, this is not the case in reverse, due to distance, topography, screening and intervening modern building development. The site is therefore not considered to have an identifiable relationship with the scheduled site.

GARSDALE FARMHOUSE, BENTGATE STREET

Grade II Listed List entry number 1068487

- 7.14 The listing description describes the building as : II House. "WMG : 1697" (William and Mary Greaves) on porch lintel but with considerable C20 alterations. Rendered stone with C20 tile roof. A long 2-storey building retaining a good single-storey porch. The porch is castellated and has large corner ball finials, an unusual gargoyle, a cornice band and a moulded door surround with segmental-arched dated lintel. Porch seats internally are equipped with circular squints. A 4-light double-chamfered mullion window to the left (with 2 mullions removed) has a hoodmould, otherwise the house has adopted the character of C20 materials and alterations. Hewn beams internally. H. Fishwick, History of Rochdale, 1889.

Significance and Setting

- 7.15 The farmhouse has historic interest with surviving historic fabric although the building itself is significantly altered. Historic farmsteads and their buildings make a fundamental contribution to the richly varied character of the English countryside and to its

economies and communities, making a contribution to the local character and distinctiveness of rural areas.

- 7.16 It is illustrative of traditional farm practices in the immediate area.

Contribution of the site to setting/significance

- 7.17 The site forms part of the agricultural hinterland to the west of the site. There are modern farm buildings located to the east which screen the farm house. Whilst the significance of the building is understood in part due to its wider landscape setting, its setting provides a modest contribution to its overall significance allowing it to be understood as an agrarian building. The use of the immediate site context which has adapted and changed as a result of changing farming practice. Its significance is considered to principally be derived from its surviving historic built fabric.
- 7.18 Due to the distance from the site, intervening topography it is not considered that the site contributes to the wider setting or significance of the listed farmhouse.

Other heritage assets

- 7.19 All other identified heritage assets are considered as a result of their siting, distance, intervening built development and the nature of the development proposed, considered to be unaffected by the development and are not considered further.
- 7.20 It is not considered that there are any non-designated heritage assets in the vicinity of the site that may be considered have local heritage interest, and considered non designated heritage assets as a result that would be affected by the development proposed.

8. Impact of Development

- 8.1 The Historic England Advice Note 12 ‘*Statements of Heritage Significance*’ (2019) recommends a staged approach to decision making which includes an assessment of impact on significance. The NPPF stresses that impacts on heritage assets should be avoided.
- 8.2 Therefore, this assessment considers how adverse impacts have been avoided and / or minimised through their design and mitigation measures proposed where appropriate. The Conservation Principles Consultation Draft (2018) states that ‘*as well as being potentially harmful, change can be neutral or beneficial in its effect on heritage assets; it is only harmful if (and to the extent that) the asset’s significance is reduced.*’
- 8.3 It goes on to state that ‘*if changes to an asset respect its significance, then in most cases they are likely to serve both the public interest of its conservation and the private interests of those who use it. Owners and managers of heritage assets ought not to be discouraged from adding further layers that are judged to be of*

*a **quality** that could add future interest, provided that the current significance is not **materially** reduced in the process.*’ It is also the case that alterations to heritage assets can better reveal or enhance the significance of heritage assets and these beneficial impacts will also be set out in this section.

- 8.4 Historic England define harm as ‘*change for the worse, here primarily referring to the effect of inappropriate interventions on the heritage values of place*’ (Conservation Principles, p71).
- 8.5 Development does not necessarily mean harm. As stated above, it is only development which reduces the significance (special interest / value) of the asset in a material way which is harmful. The scale of harm can be measured using the ‘Scale of Harm’ table. Harm within the red section; minor adverse; moderate adverse; or substantial adverse may require public benefit to outweigh that harm if it has not been balanced through beneficial effects. If harm is identified then this should be weighed against

Scale of Harm 
Substantial beneficial
Moderate beneficial
Minor beneficial
Negligible beneficial
Neutral or nil
Negligible adverse
Minor adverse
Moderate adverse
Substantial adverse

the benefits of the proposal, including securing its optimum viable use.

- 8.6 Palmer v Herefordshire Council & Anor (Court of Appeal – Civil Division, November 04, 2016,[2016] EWCA Civ 1061 (Case No: C1/2015/3383) found *‘that where proposed development would affect a Listed Building or its settings in different ways some positive and some negative, the decision maker may legitimately conclude that although each of the effects has an impact, taken together there is no overall adverse effect on the Listed Building or its setting.’*
- 8.7 The following methodology has been used as a guide to quantify the magnitude of impact, combined with professional assessment (Table 2).

Level of Impact	Factors in the Assessment of the Magnitude of Impact
Substantial	Change to key historic building elements, such that the resource is totally altered. Comprehensive changes to the setting.

Level of Impact	Factors in the Assessment of the Magnitude of Impact
Moderate	Change to many key historic building elements / setting, such that the resource is significantly modified.
Minor	Change to key historic building elements, such that the asset is slightly different. Change to setting of an historic building, such that it is noticeably changed.
Negligible	Slight changes to historic buildings elements or setting that hardly affect it / not readily evident.
Neutral	No change to fabric or setting

Table 2: Factors in the Assessment of the Magnitude of Impact (Source: Design Manual for Roads and Bridges - Volume 11, Part 2 Cultural Heritage)

- 8.8 The NPPF requires proposals to avoid or minimise conflict between conservation of the asset and the proposal. The Historic England Good Practice Advice in Planning: 2 ‘Managing Significance in Decision-Taking in the Historic Environment’ advises that:
- the significance of the asset is understood;

- the impact of development on significance is understood;
- ways to avoid, minimise and mitigate impact are explored;
- harmful impacts be justified through and balanced; and
- that negative impacts on aspects of significance are offset by enhancing other aspects of significance

8.10 The proposals will have not have direct impact on any heritage assets but may result in impacts on wider settings.

8.9 Following steps 1-3 set out above the following table considers the resulting impacts on the heritage assets identified and the resulting impacts on their significance as well as any potential mitigation.

Table 3 Impacts of Development on Assets Identified

Asset	Impact of Development	Design and Mitigation	Impacts
Ellenroad Ring Mill Scheduled Monument	Potential impact on the setting of designated heritage asset of the highest significance (Scheduled monument)	Due to the significant distances involved between the application site, the monument and intervening built development and screening provided by mature tree planting. It is not considered that development in the manner proposed would have an appreciable impact on the setting of the scheduled ring mill, with the application site not considered to contribute to the setting or significance of the monument.	Neutral

Asset	Impact of Development	Design and Mitigation	Impacts
Garside Farmhouse, Bentgate Street	Potential impact on the setting of designated heritage asset of the highest significance (grade II listed building)	Due to the distances involved between the application site, intervening built development in the wider farm setting and topography. It is not considered that development in the manner proposed would have an appreciable impact on the setting of the listed farm house, with the application site not considered to contribute to the setting or significance of the monument forming only part of a much wider agrarian setting to the farm complex.	Neutral

9. Conclusions

- 9.1 The proposed works seek to achieve a battery storage site that needs to be located in this location to achieve suitable grid connectivity.
- 9.2 The works as outlined are considered to result in neutral effects to the setting of the identified designated heritage assets. The proposal is therefore considered to comply with both local and national planning policy in respect of heritage assets.
- 9.3 Whilst no harm to heritage assets are identified (Para 128 of the NPPF) the scheme additionally is considered to bring public benefits including local job creation across a number of sectors both during manufacturer, construction and management stage. As well as contributions to carbon reduction and sustainable energy production/storage which is considered to weigh positively in favour of the development.