

6th January 2025

Dear Development Management Team

Planning Application 115160 BESS Carrington Moss

Thank you for the opportunity to submit our objection to this planning application. We have summarised our concerns and have provided more detailed information in the paragraphs which follow.

Whilst we recognise that councils have no control over when a planning application is submitted, this one is premature, is not compliant with development plan policy, and should be refused for the reasons set out below.

We are surprised by what appears to be a very selective consideration of policies in the recently adopted development plan, Places for Everyone/PfE, including those that relate to the New Carrington allocation itself. Whilst PfE is mentioned in various documents, there are very limited references to compliance with specific policies (including in Appendix C of the Planning Statement). We do not consider this development complies with a wide range of NPPF or PfE thematic or allocation policies, including those mentioned in this objection.

The New Carrington allocation policy criterion 1, for example, requires that any development on this site must be *"in accordance with a masterplan that has been developed in consultation with the local community and approved by the local planning authority"* - no masterplan has yet been published for consultation. The application is, therefore, not compliant with PfE.

As yet, no discussions have even taken place in the stakeholder workshops about the Natural Infrastructure Strategy for the allocation area or the locations for compensation/mitigation. PfE requires that the *"consideration of opportunities to restore habitats, strengthen ecological networks, and manage the carbon and hydrological implications of development, having regard to the presence of peat on parts of the site"* are central to the masterplan. This policy criterion is, therefore, also not met. In addition, the location of this scheme has previously been identified as part of the mitigation area for the destruction of a woodland SBI (109755/OUT/22).

Furthermore, whilst we are generally supportive of renewable energy solutions, they must be sited in the right locations and this is inappropriate development for several reasons, which are outlined further below (examples of non-compliance with policy provided), including:

- one of the most well-known risks of BESS are fires – there would be significant consequences of a fire burning underground, through the peat, impacting other local businesses (including those with hazard controls) if this risk is materialised and there appears to be no consideration of PfE policy JP-P1, criterion 8
- development on peat will require piling or removal of the peat, causing a huge carbon emissions event and impacting the wider peat moss, which is restorable according to Natural England, eradicating any climate mitigation or carbon neutrality benefits of the scheme
- another well-known concern about BESS is the noise pollution, which would have a significant impact on both human and wildlife populations (as mentioned below, the noise assessment does not appear to consider the vast majority of those impacted) – contrary to NPPF policies, including 180(e) and 191(a)/(b)
- given there was no preliminary ecological assessment for the whole allocation area during plan-making, it is astounding that the need for an EIA was dismissed, as discussed in the Screening Opinion section below – the significant environmental effects of this scheme have **NOT** been identified or assessed



- overall the Preliminary Ecological Assessment (PEA) seems focused on supporting the development rather than independently assessing the harmful impact of the proposed scheme – clearly the disturbance to nesting peregrine has been discussed already with Trafford as it “*will be managed as a Planning Condition*” – this and other “*mitigation and enhancement measures*” should be managed in accordance with the Natural Infrastructure Strategy for the allocation (in accordance with PfE policy JPA30, criterion 1 and criterion 24, criterion 25 also needs careful consideration)
- the applicant appears to have omitted reference to the compensation for damage to the peat moss in their BNG metric document and it is not referenced in the Planning Statement, despite Government guidance requiring developers to minimise the adverse effects on the irreplaceable habitat, to agree a compensation strategy with LPAs and to record the irreplaceable habitat in the metric tool
- mitigation and compensation need to include any harms caused to the area surrounding the site, including trees and hedgerows that may be impacted by construction vehicles or route widening
- the site has been subject to substantial surface water flooding over the past week, this is something that recurs each year
- the proposed development appears to be contrary to the NPPF policies to conserve and enhance the natural environment, including, for example, paragraphs 187, 192, 193 and 195
- due to the height of the built environment and the lowland mossland landscape, the scheme will be highly visible and does not meet thematic or allocation policy requirements (policies JP-G1, JPA30 – particularly criteria 28, 29 and 30)
- this area of the masterplan is identified for employment purposes but, whilst there will be some temporary construction jobs, this development will not result in a single FTE in permanent employment (confirmed in paragraph 8.2.4 of the Planning Statement) and there is no guarantee that any of the part time or construction roles mentioned in the documentation will be filled by local people
- there are over 1,000 horses stabled on and around Carrington Moss and the site is well-used by horse riders, their needs do not appear to have been considered at all (any route resurfacing materials must be safe for horse riders, the visual effects will be higher for horse riders, construction traffic must be required to give way to all active travel users, including horse riders)
- given issues in the wider New Carrington allocation, more work is needed to determine any potential contamination affecting the site.

The first stage of the mitigation hierarchy is avoidance and there are alternatives to causing the environmental harms that will be caused by this development, including those particularly due to development on peat and the impact to sites of biological importance in the immediate vicinity of the site.

National, regional and local guidance promotes a ‘brownfield first’ approach (including via policy in the NPPF and PfE). This proposal is not location-dependent, and we note that the applicant has plans for similar sites in other parts of the country. It would be more appropriately situated on brownfield, away from residential properties, hazardous businesses, active travel users and natural capital assets (particularly those that accommodate significant numbers of red listed birds and endangered wildlife). Trafford has already approved a larger BESS at the Carrington Powerstation site, a much more appropriate location for this type of development. There are numerous alternative brownfield sites in Greater Manchester, and beyond. The applicant could also consider increasing the size of their other sites, particularly those that are in brownfield locations.



With all of the above in mind, it is, therefore, wholly inappropriate to sacrifice greenfield (bmv agricultural) land for the very minimal benefits and significant adverse impacts that will be the consequence of this scheme.

Screening Opinion

The Screening Opinion set out at Appendix A of the Planning Statement asserts that *"The Council have consulted on this screening request with numerous statutory and nonstatutory consultees, none of which have concluded that the proposal would be EIA development"*. Residents did not get an opportunity to give their views (contrary to Trafford's Statement of Community Involvement) because this Screening Opinion was not included in the Weekly Plans List.

The Screening Opinion states that *"The proposed development is not considered to result in the use of natural resources that are in short supply"*, but it is located on an irreplaceable habitat (according to [Natural England](#)¹).

Natural England initially suggested an EIA should be required. It seems they have been persuaded that an EIA is not needed. Why is so much effort put into avoiding an EIA? If the development is not going to cause significant harm, this would be disclosed in an EIA. If it is, that harm would need to be mitigated or compensated for so the development can go ahead. Either way, the EIA does not prevent development but, given the lack of an allocation-wide ecological appraisal during the plan-making stage, it should have been an important approach to understanding the significant environmental effects of this scheme.

Pollution and nuisance do not seem to have been considered in relation to the natural environment, the disturbance and harm to birds and wildlife will be significant! Noise pollution is a known concern in relation to BESS developments. At a time when active travel is being encouraged, this site will impact users of several recorded and unrecorded public rights of way, making them less attractive. Furthermore, the scheme is expected to remove existing habitats to widen access routes for construction purposes.

Whilst the Screening Opinion references the potential for impacts to the major hazard site and major accident hazard pipeline, there is no mention of the potential ricochet effect should there be a fire on the site. Much has been reported about the tendency for BESS sites to ignite, including [this article](#) from CPRE², which highlights the potential risks of fire and thermal runaway. Planning applications, [such as this one](#)³, and [this one](#)⁴, have been refused in other areas due to the perceived fire risk. This [Significant Incident Report](#)⁵ highlights the risks to fire service staff and covers a fire in Liverpool (2020) that burned for 59 hours. We do not believe the planning application incorporates sufficient information about the risks associated with this development, which is contrary to the [Gunning Principles](#)⁶ (principle 2 requires that there is sufficient information to give 'intelligent consideration' to an issue).

Given the peatland base, containment will be a challenge, fire could travel underground and cause various threats to both humans and wildlife and to surrounding businesses and could, indeed, be catastrophic.

¹ <https://www.hwa.uk.com/site/wp-content/uploads/2023/02/Annex-A-PfE-NE-letter-to-Inspector-30.06.23.pdf>

² <https://www.cpreherts.org.uk/news/are-battery-energy-storage-systems-bess-safe/>

³ <https://www.bbc.co.uk/news/articles/c2kxxzkz3350>

⁴ <https://www.lincolnshirelive.co.uk/news/lincoln-news/battery-storage-system-refused-over-9769626>

⁵

https://www.whatdotheyknow.com/request/a_copy_of_the_fire_incident_repo/response/2075510/attach/html/5/Significant%20Incident%20Report%20Final%20redacted.pdf.html

⁶ <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>



There is no reference in the documentation to the applicant making “*appropriate provision for response and evacuation in the case of an emergency or disaster*” (PfE policy JP-P1, criterion 8) and, whilst the Planning Inspectors’ report relating to New Carrington stated that the COMAH zones should not have any prejudicial effect on the delivery of development, it also highlighted that these zones “*may affect the scale and nature of development in certain areas*” and that they “*may affect development in certain parts of the site*”.

We are keen to understand the plan for communicating the risks associated with this development to current and future residents and employees and the plan for protecting birds and wildlife from the effects of any fire related incident. Neither are covered within the proposal documentation.

There appears to have been no consideration of the cumulative impacts of this development alongside others that are planned in the area, including the cumulative impact of the proposed loss of bmv agricultural land.

Given that this scheme will be sited on deep peat (of more than 2.4m in thickness according to the geological information in the planning application and that provided to the PfE examination), the proximity of two sites of biological importance, the presence of red listed birds and endangered wildlife and several recorded and unrecorded public rights of way, we are astounded that the Council concluded that “*it is not anticipated that these developments would generate significant adverse cumulative effects with the proposed scheme that would result in it constituting EIA development*”. This is clearly contrary to the legislation and the PPG, which suggests that a Schedule 2 scheme (Energy Industry) where the area of the development exceeds 0.5 hectare, that will have a significant impact on the environment, should be required to produce an Environmental Impact Assessment.

Preliminary Ecological Appraisal (PEA)

The PEA itself recognises that Natural England are unlikely to issue the necessary licence to disturb a Schedule 1 breeding bird “*for a development of this nature*” – which suggests that a better use for this site is for the compensation and mitigation of harms caused in other parts of the New Carrington allocation area – this should be taken into consideration when developing the New Carrington Natural Infrastructure Strategy

It also seems that, despite the presence of an abundance of red listed birds in the area, the PEA does not believe dedicated surveys are required because this is a small part of the overall New Carrington allocation area and planning applications have not yet been submitted for the surrounding sites (“*it is not considered proportionate to undertake dedicated ground nesting breeding bird surveys on site (e.g. targeting skylark), due to the relatively small footprint, in relation to the wider area of Carrington, comprising similar arable habitats. The habitat immediately adjacent to the east, south and west of the site provide much of the same type of habitat, and at the time of writing did not have any proposals for development*”).

This is an inappropriate approach given the lack of previous ecological surveys for the whole allocation area and the potential that this precedent could be used by other developers, who could all claim to be making a small impact on the overall extensive harms to be caused by development in this allocation area! It should be noted that these birds are red listed for a reason and development, however “*small*” the footprint, will reduce their already depleted populations further.

Given previous sightings of water vole in the vicinity of the site, we are very concerned that the construction and operation of this scheme will create disturbances that significantly impact future populations of this very endangered creature (despite the PEA comments).

We are aware that there are several badger setts in the area, construction traffic and other disturbances could be extremely dangerous for these protected wildlife populations.



The PEA also highlighted (paragraph 3.7.37) that the site “*is assessed as moderate suitability for nesting birds, including ground-nesting species*” – this is a surprising assessment, given the number of skylarks alone that are seen frequently when walking on the adjacent routes.

The proximity of the site to the Wetland at Carrington Moss SBI in particular but also to the Birch Moss Covert SBI makes it part of an important foraging and water corridor for the birds and wildlife living in and using the area, given this, it is very concerning that the “*majority of habitats within the main site will be lost post-development*” and that it “*is not possible to mitigate for the loss of habitat for ground nesting birds*”

Development in this location will significantly impact the red listed birds and endangered wildlife that inhabit the area, disrupting their breeding and feeding activities due to noise and light pollution and the restrictions caused to wildlife foraging and movement corridors due to security measures and the height of the built environment, contrary to NPPF policies, including 191(c)

Planning Statement

Paragraph 1.4.1 states that “*During the pre-application engagement the LPA confirmed that it supported the principle of development in this location*”. There is no mention of the New Carrington Masterplan nor the need to await the outcome of the consultation. Whilst paragraph 2.2.13, for example, mentions that development on best and most versatile agricultural land is satisfied because the site is part of a plan allocation, there is no mention the first criterion in the JPA 30 policy. Even Appendix C (which is supposedly a list of relevant PfE policies) restricts reference to only two of the thematic policies and only a very limited summary of the JPA30 criteria!

Paragraph 1.6.6 quotes the NPPF paragraph 157 but fails to highlight that the paragraph requires that development should help to “*shape places in ways that contribute to radical reductions in greenhouse gas emissions*”. The huge carbon emissions event that would be the consequence of either piling or removing the peat on the site cannot be considered to meet that policy criteria!

Paragraph 3.2.6 discusses Access Road Widening. This will result in loss of existing habitat and will also include resurfacing, also confirmed in paragraph 5.9.2. Any resurfacing must take into consideration the use of the routes by horse riders. Surfaces must be suitable and safe for all users. The needs of horse riders do not seem to have been considered in any of the documentation.

Paragraph 4.3.1 suggests that the “*height of the proposed building and location of the built form is informed by an appreciation of the existing site levels and the proposed landscaping opportunities*”. This is a misleading statement. Paragraph 4.5.3 confirms the height of the various structures which, given the flat mossland landscape surrounding the development site, will be widely visible. This is confirmed in the landscape and visual appraisal figures, which demonstrate that the zone of theoretical visibility will have extensive reach into surrounding communities. This built environment will be incongruent with the surrounding area, standing out across the Carrington Moss landscape. As mentioned in the summary above, this is not compliant with PfE thematic or allocation policies.

Furthermore, the security aspects of the scheme (lighting, fencing, etc) will significantly impact the birds and wildlife that use the area the foraging and water supplies and will light up the current dark skies in the area, contrary to NPPF policy 198(c).

Paragraph 4.65 states that there will be “*a total of 22 spaces*” for car parking, which seems unnecessary given the lack of traffic (see section 5.9), the number of anticipated visits/visitors and the complete absence of permanent employee numbers to be generated by the site.



Section 5.3, which covers Ecology and BNG appears to completely ignore the requirement to compensate for damage to the peatmoss. Government [guidance](#)⁷ suggests that, whilst the 10% BNG requirement does not apply when there is loss of irreplaceable habitat (because it would be impossible to achieve), developers are required to agree a compensation strategy with LPAs. Given the wider implications of the cumulative damage to the 335-hectare peatmoss, this compensation should be in line with what is set out in the Natural Infrastructure Strategy for the allocation area, when it is published. We note that the guidance requires developers to minimise adverse impacts, and it also confirms that developers "*must record all irreplaceable habitat on your site in the metric calculation tool, regardless of whether they will be affected by the proposed development*". We can find no reference to the peat in the Planning Statement or the Metric Calculations.

In relation to Flood Risk (section 5.5), very topical after the recent flooding incidents in the area, given it is recognised that extreme weather events will increase in the future, we are concerned that there is a huge lack of understanding about the amount of surface water captured by Carrington Moss (see our recent blog [here](#)⁸) and the amount to be drained into existing ditches (which often overflow, including onto footpaths and bridleways). The change of land use in the whole allocation area will significantly increase the risk of surface water flooding across the site of the scheme and the surrounding area, including downstream of the River Mersey. Development will require the draining of additional water into ditches that already overflow, resulting in issues for wildlife, users of Carrington Moss, business owners and those farming the remaining agricultural land. Draining additional water into the Mersey or Sinderland Brook will result in downstream flooding which could impact other communities, contrary to NPPF policy 170.

The Noise Impact Assessment makes it clear that noise from the BESS is a key issue, present 24 hours a day. Paragraph 5.72 discusses potential adverse impacts at Heath Farm Lane and the Carrington Riding Centre but does not make any reference to nearer receptors, such as the Wetland at Carrington Moss SBI (Shell Pool Reserve), Birch Moss Covert SBI or the recorded/unrecorded public rights of way surrounding the site. Similarly, paragraph 4.3.1 also suggests that the scheme will be located to the east of the site to offset potential noise receptors to the west. This appears to ignore the birds and wildlife, particularly those using the foraging and movement corridors to and from the Shell Pool Reserve, the current and future users of the recorded and unrecorded public rights of way and any future residents or employees who will be impacted, given the intended future developments in the allocation area. This is contrary to NPPF policy 187(e).

It will be recognised that, given the lack of traffic, the absence of human residences and the very limited proximity to industry, the current noise levels at the development site are minimal. The peaceful location makes the area very attractive for both humans and wildlife and provides significant mental and physical health benefits. The adverse impact of the development on protected wildlife and birds and on the many who use the moss recreationally should be taken into consideration when considering whether this is an appropriate location for this development.

Section 5.8 considers the landscape and visual effects of the scheme. We disagree with the assessment of the impact of the visual effect on users of the moss and surrounding communities. This development will change the nature of the area, making cycling, walking or horse riding through the area less attractive for all active travel users.

It seems the applicant is relying on the approval of an industrial estate to the north, south and west of the site to reduce the impact of the visual effects of this development on the local area.

⁷ <https://www.gov.uk/guidance/irreplaceable-habitats#what-irreplaceable-habitat-is>

⁸ <https://friendsofcarringtonmoss.com/2025/01/05/what-exactly-is-the-vision-for-new-carrington/>



Even in this scenario, the residents of Sale West will still be adversely affected by the negative visual impact of this development. Given the security measures for the site, it will be even more visible against the surrounding dark skies at night!

Mitigation for visual effects appears to be tree planting, which is inappropriate on land which comprises 2m thickness of peat. Furthermore, the benefits of tree planting are not expected to materialise until year 15, almost half-way through the operational life of the scheme! Again, this highlights the importance of the Natural Infrastructure Strategy that will underpin the New Carrington Masterplan, as it is not only the mitigation and compensation that needs to be understood, but where, in the allocation area, such features will be located and when their benefits will accrue.

Whilst section 5.10 highlights the lack of impact to the Built Heritage and Archaeology, there is no consideration of the Carrington Rides, which are an important historical feature (protected by PfE policy JPA30, criterion 28) that will be impacted by the proposed work to the routes surrounding the site. Paragraph 8.6.3 states that Trafford "*has indicated that in light of the wider PfE PJA30 New Carrington designation, an Archaeological Survey will not be required*". Yet, it is widely recognised that historical artefacts could be preserved in the peatland soils!

Whilst section 5.11 suggests that there are no designated Ancient Woodlands within the Application Site and no veteran trees within the study area, there is a historical orchard shown on the [DEFRA Traditional Orchards site](#)⁹. This must be taken into consideration.

Finally, the Planning Statement repeatedly mentions that the proposed development is temporary and that a planning condition will be in place in relation to the decommissioning of the site. We assume this requirement will be secured via an explicit formal legal agreement, which will be transferrable to any future owners of the site.

New Carrington Natural Infrastructure Strategy

It is inappropriate to consider this planning application prior to an understanding of, and agreement on, the allocation-wide mitigation and compensation requirements. The lack of an allocation-wide Preliminary Ecological Assessment during the planning phase of PfE and the continuing lack of a Natural Infrastructure Strategy to underpin the New Carrington masterplan is impeding consideration of the likely significant effects of development in the allocation area. As a priority, there is a need for locations to be identified to facilitate mitigation of, and compensation for, the harms to be caused by the loss of Green Belt, the damage to, or destruction of, an irreplaceable habitat and the loss of, or damage to, ecologically/environmentally-rich land in the New Carrington allocation (including the thousands of trees that will be felled as a consequence of the proposed developments, the impact on 15 SBIs and an SSSI, the impact on the foraging and movement corridors and the breeding and feeding grounds of red listed birds and endangered wildlife). There will also be an impact on the mental and physical health of users of the moss, because transforming the allocation area from a peaceful, healthy and safe environment to housing estates, industrial/warehousing and roads, resulting in huge increases to air, noise, light, vibration and water pollution (when there are alternative brownfield sites available), will not be beneficial to humans or wildlife.

Kind regards

Marj Powner (Chair), Friends of Carrington Moss

⁹ <https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::traditional-orchards-hap-england/explore?location=53.422444%2C-2.388490%2C16.00>