



Dear Development Management

## Updated Planning Application 115160 BESS

Thank you for notifying us that amended plans have been received for this planning application. We believe our previous objection<sup>1</sup> dated 6<sup>th</sup> January 2025 (and all the reasons set out within it) remains valid and would like to confirm that the Friends of Carrington Moss continue to object to this planning application. The vast majority of our previous comments have not been addressed by the updated documentation and should be taken into consideration, alongside those set out below, when determining whether to approve this application.

As we mentioned in our previous objection, this development is not compliant with the New Carrington Allocation Policy, including criterion 1. Premature approval of this application could set a number of precedents which will be challenging to address. Just one example of the issues that could arise if planning applications are prematurely approved in advance of the required New Carrington masterplan being adopted relates to the policy requirement to make "*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*" central to that masterplan.

Given that this 19.9 hectare site comprises extensive deep peat (up to 250cm/8 feet in depth) and Grade 2 agricultural land (which hosts significant numbers of red listed farmland birds), and is adjacent to the Wetlands of Carrington Moss SBI, it is extremely likely that areas within the site could be identified for nature restoration within the masterplan, to ensure food, foraging and water corridors for wildlife are preserved. These may be different to those identified within the applicant's documentation due to the need to meet the requirements set out at Chapter 15 of the NPPF, the Greener Places policies within PfE and the LNRS. Furthermore, the development will impact the mitigation areas proposed for another planning application (109755) and such inconsistencies should be addressed in the masterplanning process.

Given the extensive natural capital assets on and adjacent to the site, we do not believe sufficient focus has been given to the potential for avoiding harms, rather than mitigating or compensating for them.

The PfE New Carrington policy (criterion 24) requires that "*any loss or deterioration of irreplaceable habitat, and adverse impacts on the hydrology of undeveloped areas, is minimised*". Development should not be approved if it is not (or if it is not possible to be) compliant with this policy. The peat assessment carried out to support this application should inform the masterplan and help to ensure development on restorable deep peat is avoided.

Whilst the GMEU comments themselves do not appear to be on the planning portal, the applicant's response contradicts the Natural England position suggesting that "*onsite habitats are not considered to be irreplaceable*". This is an astounding conclusion given the depths of the peat and the expert commentary from Natural England. In their response to the GMEU, the applicant seems to still be suggesting tree planting on peat which does not accord with government guidance. If BNG cannot be achieved without complying with the necessary guidelines, proposals should not be approved.

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<sup>1</sup> <https://friendsofcarringtonmoss.com/wp-content/uploads/2025/01/250106-bess-planning-application-115160-focm-response.pdf>



The applicant acknowledges that the Wetland SBI supports “*at least 79 bird species*” but suggests the impact on those species will be limited to temporary disturbances during construction. This is incorrect. The site is part of a key food, water and foraging corridor for birds and wildlife. We strongly believe that the noise assessment should be revisited to ensure it is fit for purpose in relation to the impact of the development on wildlife and birds, particularly given the site’s proximity to the Wetlands SBI. Government guidance<sup>2</sup> should be fully followed, including that related to the impact of noise if sites are next to a nature reserve. If the noise levels to be experienced are as loud as this example<sup>3</sup>, they will be significantly harmful to nature.

The applicant also suggests that the construction period will take place “*around April-September*”. This is during the nesting season and will have the highest impact on bird and wildlife species.

As we highlighted in our previous response, there are numerous red listed birds in the area of the site, including several pairs of skylarks. The applicant’s suggestion that the site is of “*lower value for farmland birds*” is incorrect. Furthermore, their assumption that red listed birds will “*only be present in low numbers*” is not evidenced. We believe bird surveys are necessary. We have commented elsewhere on the inadequacy of the Carrington Relief Road assessments. The proposed mitigation of a contribution via the S106 agreement “*on the basis of providing mitigation for 1 pair of skylark*” is pitiful and should not be accepted.

Whilst we acknowledge the BNG report has been updated to include 2 borderline ditches, we are sceptical about the assertion that ditches were dry during their visits. The applicant also talks about the effects of trying to raise the water table in a single field. There is clearly a huge lack of local knowledge, all the fields in this area are regularly under significant levels of surface water flooding for several months of each year. Please refer to the Carrington Lake<sup>4</sup> page of our website for evidence of the level of water captured and stored in the area.

It should be recognised that Natural England are the experts in relation to peat, and their advice should be fully followed. They have determined the (overall) 335-hectare peat moss to be irreplaceable and restorable. Natural England’s objection highlights that this proposal would “*hinder future restoration efforts, beyond the application site, effecting the ability for the wider peat mass to be restored due to potential connecting hydrology*”. Contrary to the applicant’s assertion, Natural England also confirm that peat can be restored “*as long as it is able to hold water and sequester carbon*”.

The Peat Survey acknowledges (para 5.1.1) that the “*majority of the survey area comprises deep peat (depth > 50cm)*” and (para 5.1.2) that “*80% (15.7ha) of the survey area comprises peat soils*”. The document indicates the peat depths at paragraph 4.2 and confirms that the “*peat depth across the majority of the survey area exceeds 100cm, covering an area of 15.16ha (77.4%)*”. A further “*5.59ha (28.7%) comprises peat of 101-150cm, 6.78ha (34.6%) comprises peat of 151-200cm depth and 2.57ha (13.6%) comprises peat of 201-250cm. A small area, 0.06ha (0.4%) comprises the deepest peat of 251-300cm*”. Even the lowest depth is 39”, over 3’ in depth!

The applicant insists the site is not an irreplaceable habitat and, bizarrely suggests that “*the development would be time limited to 40 years, after which point all above ground infrastructure would be removed and the land would be restored*”. We will await Natural England’s response and their comments on the Peat Management Plan but removed or piled peat cannot be reestablished, and the destruction of the wider peat moss would be irreversible.

<sup>2</sup> <https://www.gov.uk/government/publications/noise-and-vibration-management-environmental-permits/noise-and-vibration-management-environmental-permits#:~:text=Noise%20impact%20on%20other%20species,-In%20some%20cases&text=For%20example%2C%20if%20your%20site,hearing%20and%20sensitivity%20to%20sound>.

<sup>3</sup> <https://www.facebook.com/watch/?v=3734719110185701>

<sup>4</sup> <https://friendsofcarringtonmoss.com/carrington-lake-2/>



The applicant asks whether offsite compensation should be considered. If this relates to offsite to the overall allocation, we do not agree. Given the size and scale of Carrington Moss (335 hectares), off-site compensation should not be an option. We should not be allowing the destruction of this huge local natural capital asset.

Natural England's comments demonstrate the importance of the Natural Infrastructure Strategy for New Carrington, which should be urgently developed to ensure the ecological enhancement, mitigation and compensation are appropriate in relation to the harms to be caused. This crucial element of the masterplanning process would also ensure that the creation of new habitats follows national guidelines and does not, for example, suggest tree planting on deep peat! The Natural Infrastructure Strategy to support the New Carrington Masterplan should provide the principles for a suitable compensation strategy, following advice from Natural England.

We recognise that Greater Manchester is committed to achieving carbon neutrality by 2038 and that Trafford declared a Climate Emergency in 2018. Trafford has also produced a Carbon Neutral Action Plan. Whichever solution the applicant determines for dealing with the peat, it will lead to a significant carbon emissions event. This will totally eliminate the carbon benefits of this energy solution and should be very visible in both Trafford and GM's carbon calculations.

The applicant notes that the "*allocation was found sound at Examination on the basis that the public benefit of its development would in principle clearly outweigh the loss or deterioration of the habitat subject to a suitable compensation strategy being delivered*". The public benefit expected of this site was employment, yet this scheme does not provide any permanent jobs. It, therefore, does not provide the public benefit expected and, given the potential destruction of an irreplaceable habitat, should not be approved.

The Landscape and Visual Appraisal document paragraph 1.6.9 omits the New Carrington Allocation PfE policies that are relevant to the LVA, which require (criteria 28, 29 and 30 respectively) developments to retain important landscape views and features, to reflect and respond to the special qualities and sensitivities of the Mossland and Lowland Farmland landscape character type and provide appropriate landscape buffers across the site.

The applicant suggests (para 5.3.2) that "*Characteristics such as the semi-rural, relative tranquil rural backdrop to Carrington and the landscape components such as the arable field, boundary tree and scrub vegetation, and surrounding tracks/footpaths would only slightly alter as a result of the permanent loss of open arable land and a very small loss of boundary vegetation and their replacement with new built form infrastructure and new access road*".

This is an astounding assessment given the height of the built environment and the size of the loss (19.9 hectares). There is no assessment of the visual impact for Sale West residents, who, as mentioned in our previous objection, will be adversely affected by the negative visual impact of this development, which will be highly visible against the surrounding dark skies at night!

In addition, the proposed widening of Ashton Road should not be permitted until it is clear what the impacts of such a change would be on the proposed natural infrastructure requirements to be set out in the masterplan, including the deep peat deposits. The applicant's documentation suggests that the location of the widening is "*within the retained Green Belt*". The retained Green Belt was supposed to be protected by participation in the Places for Everyone, so should not be impacted by this application.

We are unclear about why there is a need for the part of Ashton Road in the retained Green Belt to be widened. In addition, the applicant suggests that the LPA regard this route as a target for "*improvements as part of the connectivity for the wider allocation of New Carrington*". As these aspirations have not been shared with the community, we would welcome more information about this assertion.



We highlighted the risks of BESS in our previous response and the applicant sets out the potential for fire in their Outline Battery Safety Management Plan (paragraph 1.6.2).

Expert evidence<sup>5</sup> suggests that “*batteries are large and unstable concentrations of energy and thus their presence near human habitation brings major risks, particularly from fire*” and “*A large capacity BESS needs to be handled carefully – so much energy in a confined space is, in effect, an unexploded bomb. A recent working paper by Fordham et al. – a group of eminent physicists – observes that a fully charged 1-MWh BESS has an explosive potential equivalent to 0.86 metric tons of TNT. A 1600-MWh BESS is thus equivalent to nearly 1400 tonnes of TNT, with potential for huge explosions, fires and clouds of toxic gas*”.

Several BESS sites have been approved in and around Trafford, with 2 sites already having planning permission in Carrington. Given their proclivity to uncontrollable fires which are hard to extinguish and the release toxic fumes, three sites in one residential and employment area marks a significant increase in the probability of that risk materialising, with residents (including future residents at the New Carrington location), school children, employees and users of the future Carrington Relief Road all being exposed, along with the fire service, who will need several access points to ensure they are not downwind of any toxic fumes if a fire occurs. Such fires can also result in ground contamination, which could prevent the site from returning to its current use and could contaminate a much wider area of New Carrington.

This BESS would be a 600-MegaWatt (MW) facility (the equivalent of over 500 tonnes of TNT) and, as we highlighted in our previous response, we are concerned that there are no procedures that confirm what actions should be taken in the event of an emergency or a disaster (a requirement of PfE policy JP-P1, criterion 8).

There is also no substantiation of need for this additional BESS in Carrington. The BESS pipeline is robust, with current evidence<sup>6</sup> suggesting that there are 1659 active battery storage projects in the UK and that the BESS connection queue is double the Grid's Requirement for 2030<sup>7</sup>. In relation to the target capacity in the Government's Clean Power 2030 Action Plan<sup>8</sup>, “*the connections queue for BESS out to 2030 is 61GW, more than double the respective target capacity range, while the queue out to 2035 is 129GW, more than quadruple what is sought by then*”.

Indeed, the recent appeal decision for the BESS at land off Golf Road (APP/Q4245/W/24/3343250) stated “*projects trying to connect to Daines substation in Carrington are now only being offered connections by 2037*”.

The suggests that damage will be caused to the peat and other natural capital assets immediately but there will be no connection for to the Grid for over 10 years!

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

The destruction of peat at depths of between 51cm to 250cm (that is between 1' 8" and 8' 2"), which could lead to damage to, or the complete destruction of, the rest of the 335 hectare peat moss, should not be considered acceptable to anyone (developer, Council, or Planning Inspectorate).

<sup>5</sup> <https://static1.squarespace.com/static/656f411497ae14084ad8d03a/t/66fd2383b56dbc6906390297/1727865736681/Fannon-Batteries.pdf>

<sup>6</sup> <https://www.renewableuk.com/energypulse/blog/battery-storage-capacity-in-the-uk-the-state-of-the-pipeline/>

<sup>7</sup> [https://www.cornwall-insight.com/press-and-media/press-release/battery-storage-connection-queue-double-the-grids-requirement-for-2030/?fbclid=IwY2xjawJg2PxleHRuA2FlbQlxMQABHpicbzqArdl6bnAcaXKI\\_Skb5aTjcy0rF97YdzlWa9FbmQEfyiktsxG8Hybaem\\_jS32vgf1Yu1aIOR3Hib5w](https://www.cornwall-insight.com/press-and-media/press-release/battery-storage-connection-queue-double-the-grids-requirement-for-2030/?fbclid=IwY2xjawJg2PxleHRuA2FlbQlxMQABHpicbzqArdl6bnAcaXKI_Skb5aTjcy0rF97YdzlWa9FbmQEfyiktsxG8Hybaem_jS32vgf1Yu1aIOR3Hib5w)

<sup>8</sup> <https://assets.publishing.service.gov.uk/media/677bc80399c93b7286a396d6/clean-power-2030-action-plan-main-report.pdf>

## FOCM Second Response Planning Application 115160 BESS



We believe the points we raised in our original objection and those set out above should result in a determination that the planning application is premature and should not be approved.

Kind regards

Marj Pownert (Chair)

Friends of Carrington Moss