

Land North of Ashton Road, Carrington Daines Battery Energy Storage System (BESS)

Lawful Development Certificate Application: Supporting
Statement

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Lawful Development Certificate Application: Supporting Statement

Author	Toby Roberts
Checker	Kate Coventry
Reviewer	Charlie Mayer
Approver	Kate Coventry / Charlie Mayer
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1 Introduction

1.1 Background

- 1.1.1 Arcadis Consulting (UK) Limited has been commissioned by SSE Daines BESS Limited (the Applicant) to prepare this Lawful Development Certificate (LDC) in relation to the use of Permitted Development (PD) Rights on adjoining land associated with the consented Daines BESS project (hereinafter referred to as “BESS”) (planning ref: 115160/FUL/24) on land north of Ashton Road, Carrington.
- 1.1.2 If accepted, the construction of a temporary access road (with associated temporary compound), a temporary construction compound and upgrades to surrounding roads to facilitate development of the BESS site could take place under PD rights.

1.2 Purpose of this Statement

- 1.2.1 A planning application for the BESS was submitted on the 9th December 2024 on land north of Ashton Road, Carrington on behalf of SSE Daines BESS Limited. Planning permission was granted on the 15th May 2025.
- 1.2.2 Prior to the submission of the planning application, a pre-application request was issued to Trafford Council to discuss the principle of development of the BESS facility and the ability to deliver the temporary construction compound through PD rights.
- 1.2.3 The pre-application communications with the LPA confirmed that aspects of the Proposed Development could be regarded as PD under the Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO) and therefore will not require planning permission. This now needs to be confirmed formally through the LDC. It is for this reason that SSE Daines BESS Limited are now submitting a LDC for the identified temporary works that are required to facilitate construction of the BESS.
- 1.2.4 In accordance with the Town and Country Planning Act 1990 (Section 192) Part 8, Section 192, the application for a LDC must detail the specific land to which is relevant, describe the operations in question, give reasons for determining the proposed as lawful and specify the date of the application of the certificate. This LDC is accompanied by the relevant application form, application fee, site location plan and plans indicating the full extent of the proposed works, and further information appropriate to the application.

2 Site Context

2.1 The Site

- 2.1.1 The BESS site associated with planning permission 115160/FUL/24, granted 15th May 2025, is located approximately 16 km to the southwest of Manchester city centre and within 4 km of the Carrington Spur (A6144M), which joins the Application Site at Junction 8 of the M60.
- 2.1.2 As shown in Figure 2-1, The BESS Site is located off Ashton Road and is adjacent to the former Carrington petrochemical site. The existing LyondellBasell polypropylene facility, which includes flair stacks, is immediately to the north of the Site. The BESS Site is located 0.6 km to the southwest of Daines National Grid sub-station (Post Code: M31 4BH).

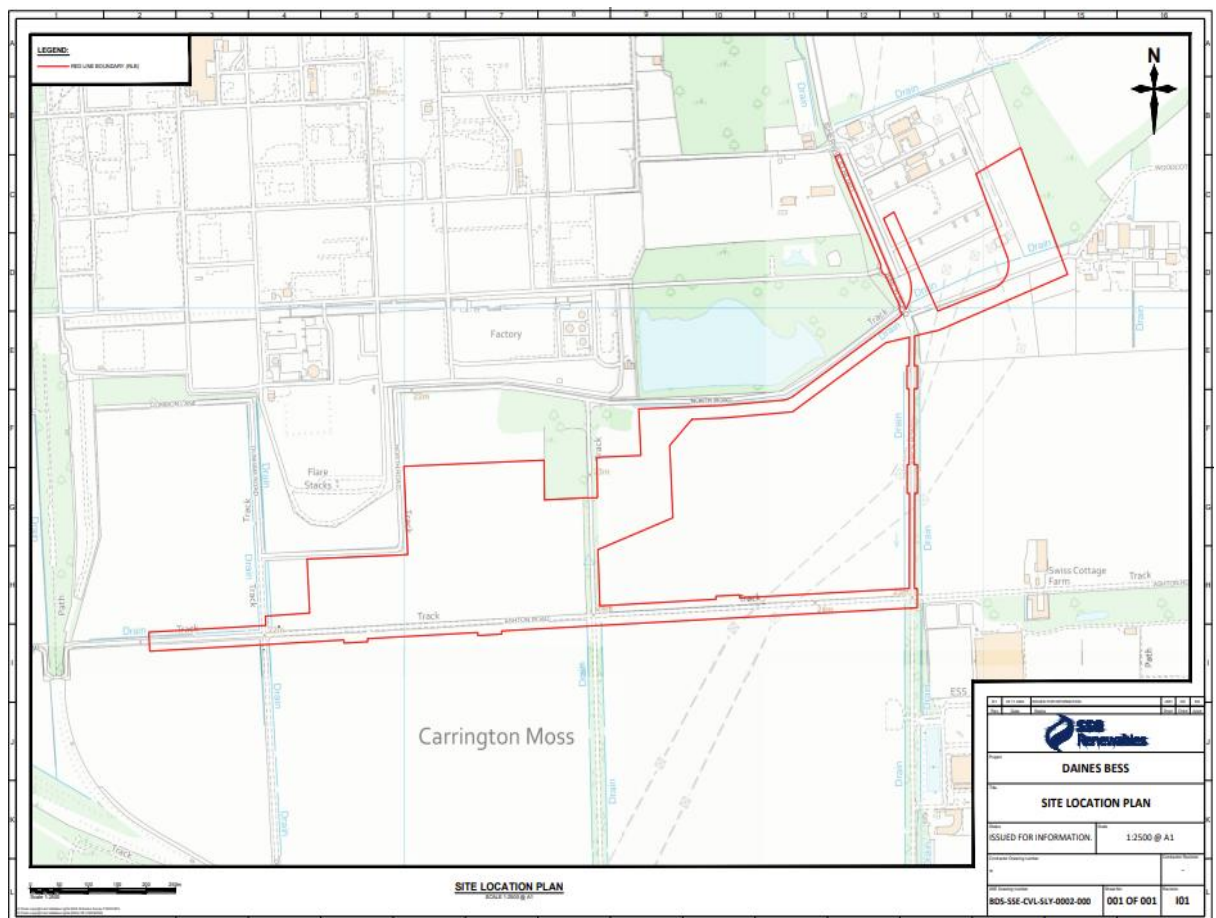


Figure 2-1 – Site Location Plan for Application 115160/FULL/24 (Ref. BDS-SSE-CVL-SLY-0002-000)

2.2 The Subject Site

- 2.2.1 As shown in Figure 2-2, the Subject Site of this LDC will be located immediately adjacent to the BESS site, on arable fields, public roads and the local private road network.
- 2.2.2 At the Subject Site, PD rights are being requested for a temporary access road (with associated temporary compound), a temporary construction compound and upgrades to roads providing access to the BESS such as North Road, Birch Road, Ashton Road, parts of Isherwood Road, and areas northeast of Birch Road. The purple areas shown on Figure 2.2 indicate the land required for these temporary elements.

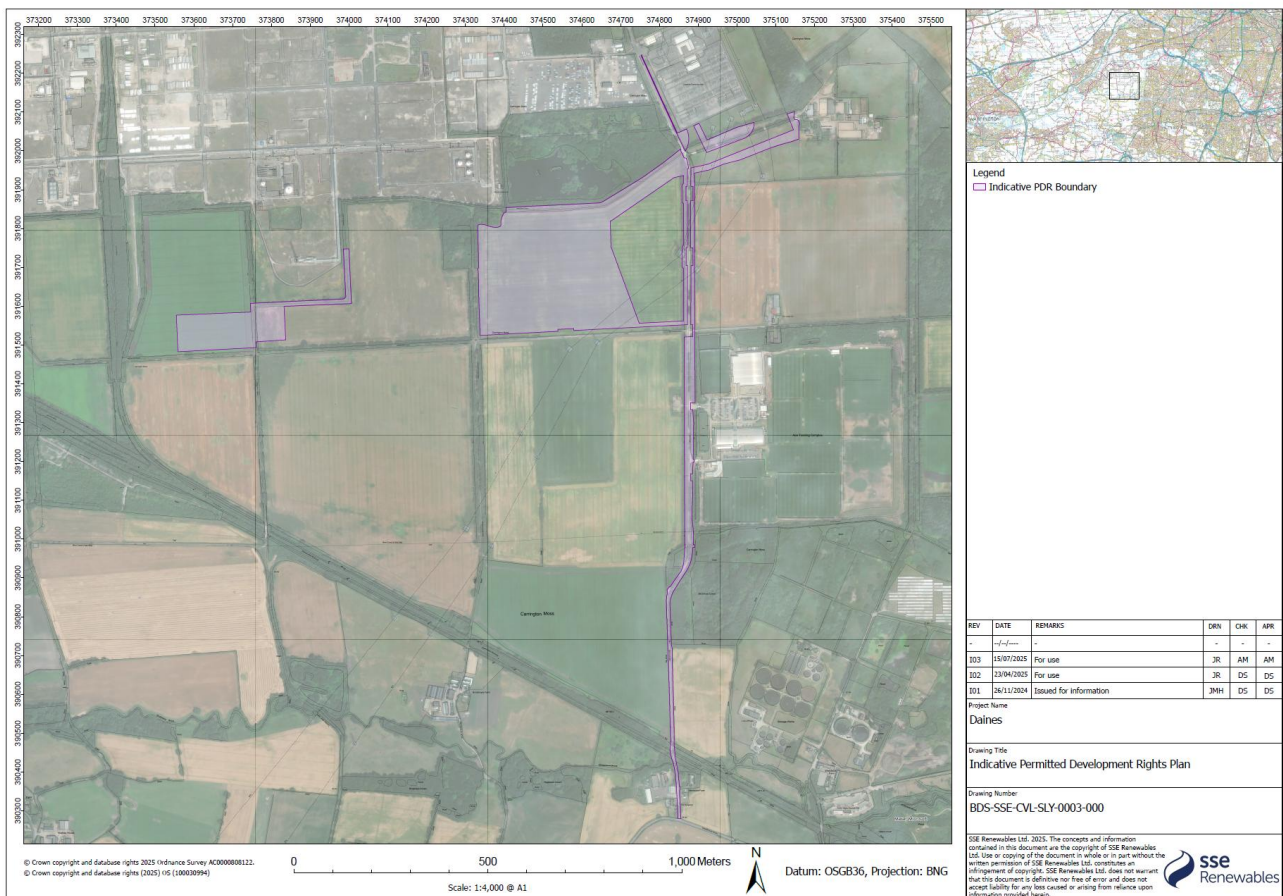


Figure 2-2 – Indicative Permitted Development Rights Plan (Ref. BDS-SSE-CVL-SLY-0003-000)

3 The Need for Development

- 3.1.1 SSE Renewables (SSER) is committed to developing and operating onshore and offshore wind farms across the United Kingdom. In addition to wind energy, the company actively pursues the development of solar farms and other renewable energy infrastructure, including battery storage facilities, which play a crucial role in facilitating the transition to a zero-carbon energy sector. The BESS is intended to enhance the UK's electrical infrastructure by improving its adaptability, reliability, and capacity to address the challenges of climate change, while supporting government objectives to achieve net zero carbon emissions by 2050.
- 3.1.2 To facilitate the construction of the BESS, a temporary access road (with associated temporary compound) and the temporary construction compound is required on land adjacent to the site, as there is no available land during construction within the site's red line boundary.
- 3.1.3 The temporary access road is necessary to support access and operations during the construction phase and limit traffic on the local road network surrounding the BESS such as Ashton Road and Birch Road. The temporary access road will be located along the cable route and will be used both for construction of the BESS infrastructure and the laying of the cable.
- 3.1.4 The temporary construction compound and temporary compound required to facilitate construction of the temporary access road are essential for serving as a centralised base to organise construction activities, materials, tools, and equipment, ensuring efficient coordination of project tasks.
- 3.1.5 These compounds also provide facilities that comply with health and safety regulations, offering a safe and comfortable environment for personnel working on-site. Additionally, temporary compounds contribute to minimising the environmental impact of construction activities by providing designated areas for waste management and recycling. They ensure materials are stored and handled responsibly, reducing the risk of pollution to the surrounding environment. Temporary compounds also establish a secure and controlled space for project operations, preventing unauthorised access and serving as the primary point of entry for deliveries, personnel, and vehicles, thereby enhancing site safety and accessibility.
- 3.1.6 As part of these works, it is proposed that PD rights be extended to the surrounding road network to facilitate the rapid and efficient construction of temporary infrastructure without requiring full planning permission. Granting PD rights for these roads will help prevent delays and ensure streamlined project logistics. In remote or rural areas, such rights are vital for accessing sites lacking permanent infrastructure, supporting the smooth transport of machinery, materials, and personnel. Additionally, the provision of PD rights ensures that the roads are designed and maintained to be safe during construction, operation, and post-construction, ultimately providing safer roads for builders, contractors, and the public.

- 3.1.7 Overall, the granting of PD rights for the temporary elements outlined are crucial for maintaining efficiency, safety and organisation throughout the construction process, ensuring smooth and effective project execution from start to finish.

4 Proposed Development

4.1 Planning Application (Ref. 115160/FUL/24)

4.1.1 Planning permission was granted on the 15th May for the following scheme:

“Proposed development of a containerised Battery Energy Storage System comprising battery units with transformer units and inverter cabinets, switchgear buildings, internal access tracks, electrical substation compound including transformers, switchgear, and associated equipment, CCTV and emergency / security lighting, perimeter fencing, underground surface water drainage infrastructure, vehicular parking area, site welfare facilities, underground cable connection, widening of Ashton Road and other associated infrastructure”

4.1.2 Details of the Proposed Scheme are set out in the following approved drawings:

- Site Location Plan (Ref. BDS-SSE-CVL-SLY-0002-000).
- Proposed Site Layout (Ref. BDS-SSE-CVL-SLY-0001-000).

4.1.3 The BESS would be connected via underground cabling to the Daines National Grid Substation in the northeast of the Application Site.

4.1.4 The approved Proposed Development therefore consists of the following:

- Battery Storage Compound.
- Switchgear buildings.
- Internal access tracks.
- Electrical substation compound including transformers, switchgear, and associated equipment.
- CCTV.
- Emergency / security lighting.
- Perimeter fencing.
- Underground surface water drainage infrastructure.
- Vehicular parking area.
- Site welfare facilities.
- Underground cable connection.
- Other associated infrastructure.
- Indicative Permitted Development Rights Plan (Ref. BDS-SSE-CVL-SLY-0003-000).

4.1.5 Figure 4-1 depicts the proposed site layout:

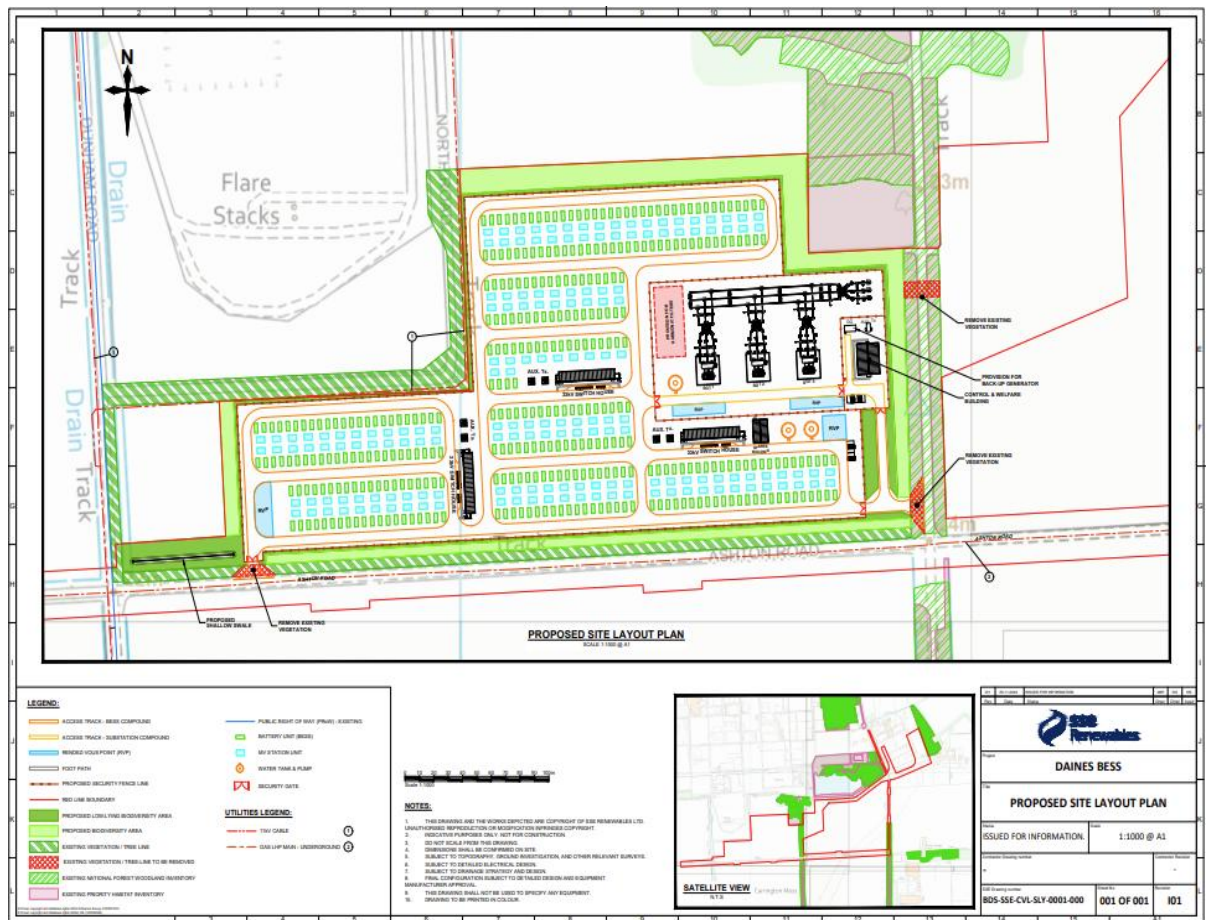


Figure 4-1 – Proposed Site Layout (Ref. BDS-SSE-CVL-SLY-0001-000)

4.1.6 Figure 4-2 depicts the proposed temporary works, further described below:



Figure 2-2 - Proposed Temporary Works (Ref. DNS-CVL-SK-0038)

4.2 Temporary Access Road

- 4.2.1 The delivery of the temporary access road will help to reduce the overall project construction programme for this critical energy infrastructure, alongside providing the necessary direct access to the cable route area for that element of the construction. The construction period of the development will shorten, and it will improve ability to control access to the site and support the project's grid connection date in 2028.
- 4.2.2 Due to the presence of peat and the associated objective to minimise peat removal, we have looked to utilise knowledge from the construction of onshore wind farms which are typically built in similar ground conditions. It is suggested that a 'floating track', of temporary nature, could be constructed to provide access to the main BESS site. This track would be approximately 650m in length and 6m wide to accommodate two-way traffic. The estimated construction duration for the track is 4-6 weeks, subject to stone delivery logistics and weather constraints.

- 4.2.3 Figure 2-2, above shows the proposed routing of the temporary access road, which is drawn along the proposed cable route. The temporary access road will require a small compound on the northeast end (Detail 1 of Figure 4-2) to act as a laydown area for welfare, parking etc. during the early stages of construction, and to provide for implementation of a security barrier at the junction with Birch Road, also visible in Detail 1. The temporary construction compound will be constructed in a similar method to the temporary access road.
- 4.2.4 An example of a typical floating track construction method, used in a recent SSE project, is shown in Figure 4-3 below. The eventual track construction will be informed by ground investigation results and associated detailed design.

4.3 Temporary Construction Compound

- 4.3.1 The temporary construction compound, shown in in the south-west of Figure 4-2, above, will cover an area of approximately 2.8 ha and will feature parking facilities, welfare provisions, office spaces, fencing, drainage and areas for equipment and plant storage. The temporary buildings are anticipated to have a maximum height of up to seven meters, including two-story office structures.
- 4.3.2 The temporary construction compound will host vehicles including Heavy Goods Vehicles (HGV), cranes, and other plant vehicles as required and will store the appropriate materials, equipment, and plant machinery required for the construction and installation of the proposed development.
- 4.3.3 The location of the temporary construction compound has been carefully considered, with the decision made to situate it on the land nearest to the BESS Site and the temporary access road, ensuring it does not interfere with the high-pressure gas pipeline on Ashton Road or future developments within the allocation.
- 4.3.4 Post construction of those matters deeming approval under planning application 115160/FUL/24, the temporary construction compound will be deconstructed, and the site will be returned to its current use.
- 4.3.5 The temporary construction compound is expected to be required for two years during the construction phase.

4.4 Road Works

- 4.4.1 Through the approval of the planning application the widening of Birch Road and Ashton Road have been formally secured. However, PD rights continue to be sought during the construction phase as road improvements may be necessary to accommodate the movement of construction vehicles including Abnormal Indivisible Loads deliveries.
- 4.4.2 As illustrated in Figure 2-2, PD rights are being requested for the surrounding roads that provide access to the temporary construction compound. This includes North Road, Birch Road, Ashton Road, sections of Isherwood Road and areas to the northeast of Birch Road.
- 4.4.3 These roads will be utilised for access to both the temporary construction compound and the wider BESS site, as well as to enable temporary construction activities required for the installation of the cable route associated with planning application 115160/FUL/24. Such activities may include, but are not limited to, temporary laydown areas, plant storage and operations, fencing and screening.
- 4.4.4 PD rights are being sought for any necessary pothole repairs, temporary verge widening, street furniture removal (in agreement with the local roads authority) and any other

maintenance relating to surface maintenance to ensure construction traffic can safely access the compound.

5 Permitted Development Assessment

- 5.1.1 As aforementioned in Section 3.2.1 within the Planning Design and Access Statement submitted for the BESS planning application (Ref. 30217049-ARC-PLA-REP-00001):

“Communication with the LPA has confirmed that aspects of the Proposed Development could be regarded as Permitted Development (PD) under the Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO) and therefore will not require planning permission.

This will be confirmed formally through a Lawful Development Certificate (LDC). Those aspects constituting PD are shown on the Permitted Development Plan (drawing number BDS-SSE-CVL-SLY-0003-000) which forms part of the application package

The PD aspects of the Proposed Development include the creation of a temporary construction and welfare compound for the storage of materials, plant, and machinery along with welfare facilities. The temporary compound is sited directly adjacent to the west of the BESS, as shown on the submitted Permitted Development Plan.”

- 5.1.2 Class A, Part 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO) allows for:

“the provision on land of buildings, moveable structures, works, plant or machinery required temporarily in connection with and for the duration of operations being or to be carried out on, in, under or over that land or on adjoining land.”

- 5.1.3 Paragraph A.1b of the GPDO explains that such development is not permitted where there is an unfulfilled requirement for planning permission for the relevant (adjacent) operations. This means that the PD elements of the Proposed Development are interdependent on the granting of the full planning permission for the BESS facility.

- 5.1.4 On the basis that the temporary access road (with associated temporary access compound) and temporary construction compound is to be built prior to the construction of the approved BESS Development, it is considered that both elements would benefit from PD rights under the GPDO and therefore excluded from the red line boundary for the submitted planning application (as illustrated on the Site Location Plan)

- 5.1.5 Paragraph A2 confirms that on completion of construction of the primary application, the permitted development that is granted by Class A Part 4 is removed and the adjoining land on which the temporary access road and temporary construction compound that was permitted development will be, as soon as reasonably practicable, reinstated to its condition before that development was carried out. For the location of the temporary access road and temporary construction compound pertaining to this LDC, this will be arable fields.

It is worth noting that the indicative plans submitted as part of the BESS planning application (Figure 4-1) have evolved over time and now have the proposed temporary construction compound location to the east of the BESS site, as shown on

5.1.6 Figure 2-2. The original location to the west has been preserved to ensure access and construction remain unrestricted in the event that the eastern temporary construction compound's capacity is exceeded or not accessible, the applicant would like the option to revert to the western area.

5.1.7 Other areas covered by PD in Figure 2-2, include temporary areas to facilitate the construction works to be undertaken, temporary pedestrian segregation, and any minor repairs needed to the access roads as required.

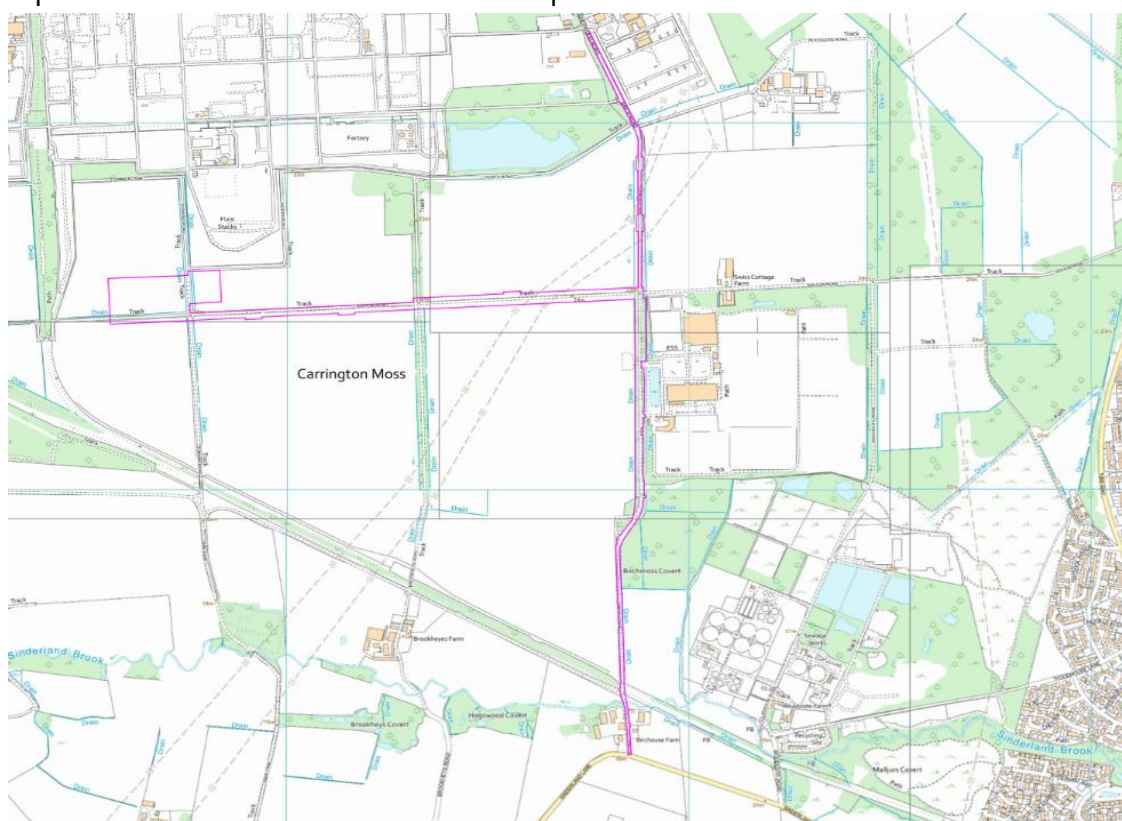


Figure 5-1 – Previous Permitted Development Plan (drawing number BDS-SSE-CVL-SLY-0003-000)

5.1.8 The works set out in this LDC appropriately meet the conditions of Class A, Part 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO), and not only support but aid in early delivery, of the approved project which delivers critical energy infrastructure.

6 Conclusion

- 6.1.1 Arcadis has submitted, on behalf of the Applicant, an application for a Certificate of Lawful Development to Trafford Council to carry out works at Land North of Ashton Road, Carrington Daines Battery Energy Storage System, using Permitted Development Rights under Schedule Class A, Part 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015
- 6.1.2 This Supporting Statement describes the BESS Site and the proposed works and explains why SSE Daines BESS Limited considers that they constitute Permitted Development under Class A, Part 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015.
- 6.1.3 Class A, Part 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 states that Permitted Development may be granted for temporary routes and compounds when associated with an approved application so long as the proposed PD is consisted with, *“the provision on land of buildings, moveable structures, works, plant or machinery required temporarily in connection with and for the duration of operations being or to be carried out on, in, under or over that land or on adjoining land.”*
- 6.1.4 The Site for the temporary construction compound and temporary access road (with associated temporary compound) will be returned to arable field as soon as reasonably practicable, post BESS construction as to comply with Paragraph A2, Class A Part 4.
- 6.1.5 SSE Daines BESS Limited, as the Applicant, respectfully requests that a Lawful Development Certificate is issued to confirm that the proposed Compound associated with approved planning application ‘115160/FUL/24’, does not require planning permission and formally constitute lawful development.

Arcadis Consulting (UK) Limited

80 Fenchurch Street
London EC3M 4BY
United Kingdom

T: +44 (0)20 7812 2000

[arcadis.com](https://www.arcadis.com)