



24th September 2026

Dear Development Management Team

Planning Application 119712 BESS Carrington Moss

Thank you for the opportunity to submit our objection to this planning application. This is yet another premature planning application that is coming forward in advance of the New Carrington Masterplan. As it is not compliant with development plan policy, it should be refused for this and the other reasons set out below.

Location

As we outlined in our response to the previous BESS application (115160), whilst we are generally supportive of renewable energy solutions, they must be sited in the right locations and this location is inappropriate development for several reasons, including:

- one of the most well-known risks of BESS are fires – there would be significant consequences of a fire near to existing businesses such as Saica Paper and Air Products
- BESS are also known for their noise pollution, which would have a significant impact on both human and wildlife populations (see our further concerns below)
- due to the height of the built environment and the surrounding landscape, the scheme will be highly visible and does not meet thematic or allocation policy requirements in this regard
- given the lack of visible geological surveys and the issues that have arisen in the wider New Carrington allocation, more work is needed to determine any potential contamination affecting the site.

Further reasons for refusal are provided below:

New Carrington Masterplan

The applicant appears to have disregarded the requirements of PfE policy JPA 30, particularly policy criterion 1, which, 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*” - the masterplan has not yet been published for consultation.

The Planning Inspectors’ Report¹ for the Places for Everyone Plan makes it clear (paragraph 641) that “*it is not appropriate for the policy to allow for certain parts of the site to come forward in advance of any masterplan*”.

The delay in the production of the New Carrington Masterplan, 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 are impeding consideration of the likely cumulative significant effects of development in the allocation area and, as a consequence, there is no understanding of the land needed for the mitigation and compensation for the huge level of environmental and ecological harms to be caused by the size and scale of the proposed developments.

It is, therefore, inappropriate to consider this planning application prior to an understanding of, and agreement on, the allocation-wide mitigation and compensation requirements.

¹ <https://www.greatermanchester-ca.gov.uk/media/9282/pfe-inspectors-report-01-final.pdf>



No further developments should be approved in advance of that Masterplan being adopted because there is currently no evidence that there is sufficient land available and the largest local landowner has stated (in their response to the Local Plan consultation) that they intend to develop their entire landholdings, using Grey Belt designation to do so. This will cause significant additional environmental and ecological harm that will also need to be mitigated or compensated for.

Transport Statement 1620296

The Transport Statement may have been produced for another proposal as, although the Introduction says (our bold emphasis) that it has been prepared *“to support a full planning application for the construction of a **1400MW (2800MWh)** Battery Energy Storage System (BESS) on land off Manchester Road”*, paragraph 5.1 states the following (our bold emphasis): *“The forecast traffic generation for the construction phase of the development has been based on that prepared to support a planning application for the construction of a battery storage facility adjacent to Carrington Power Station and within the Trafford Low Carbon Energy Park, Trafford. That site comprised a 7.7ha facility and a 1 GW output. On this basis, **the proposed Trafford BESS facility, being a 200MW battery energy storage facility on a site area of 7.5ha, essentially comprises an equivalent site area albeit reduced capacity**”*.

This site is 8.3ha, this BESS is significantly larger (and requires a much greater physical footprint) than 200MW, so the Transport Statement needs to be reproduced for this specific application and must be clear and accurate about the associated traffic impact.

This is important because the proposal suggests that, if approved, construction will commence prior to the Carrington Relief Road being available, meaning that all the construction traffic will travel through Carrington Village.

Environmental Impact Assessment

Given there was no preliminary ecological assessment for the whole allocation area during plan-making, a comprehensive EIA is necessary to ensure the applicant identifies and assesses all the significant environmental effects of this scheme

The Planning Statement suggests (paragraph 1.4) that the proposed development is not classified as a Schedule 2 under the EIA regulations. This is a surprise as the legislation² appears to suggest that the criteria for provision of an EIA is that the *“area of the development exceeds 0.5 hectare”*.

The applicant's assessments that are available for review conclude that there are no significant adverse impacts as a result of the proposed development. This is an implausible conclusion given the size and scale of the development. It will have significant adverse impacts.

The Bat Survey (1620291) suggests that it is designed to be read as an appendix to the Ecological Impact Assessment (EcIA) prepared by SLR (SLR Consulting Ltd (2026) 416.066296.00001 Trafford BESS Ecological Impact Assessment v1). That EcIA report does not appear to be on the portal. The Planning Statement which is dated 13th May 2026 suggests that the EcIA is “ongoing”. If that remains the case, the application is premature.

We note and welcome the confirmation in the GCN Report (1620283), which concludes that, as most ponds could not be accessed, the EcIA will assume they are present and will ensure appropriate mitigation measures are put in place during construction.

² <https://www.legislation.gov.uk/ukxi/2017/571/schedule/2>



Biodiversity Net Gain

It is our understanding that, if the proposed development site is larger than 0.2 hectares, a **10% statutory BNG** is mandatory.

The mitigation and compensation should include any harms caused to the area surrounding the site, including trees and hedgerows that may be impacted by construction vehicles or route widening.

There is no BNG report, and the BNG metric file appears to be either corrupt or incomplete. As things stand, this development does not meet the requirements of BNG regulations.

The planning application should, therefore, be refused.

Landscape and Visual Impact

The Landscape and Visual Appraisal and the Landscape Strategy mentioned in the Planning Statement are not on the planning portal, making commentary a challenge.

Given the flat landscape surrounding the development site, however, and the size and scale of this development, it will be widely visible.

Whilst the applicant may be relying on the industrial landscape to the north and west of the site, there are residential and other properties (such as St George's Church and the Vicarage) to the south and east. The security aspects of the scheme (lighting, fencing, etc) will significantly impact the birds and wildlife that use the area for foraging and water supplies and will light up the current dark skies in the area, contrary to NPPF policy.

Noise Assessment

The Noise Assessment mentioned in the planning statement (5.8) is not included in the planning application documentation. The document suggests that the highest operational noise levels have been predicted at Sycamore Cottage, but makes no mention of the Vicarage, even though it is shown on the Residential Receptors Map and noise from the BESS will be a key issue, present 24 hours a day, every single day. The cumulative impact of noise and other pollutants (including, for example, air, dust and vibrations) for this receptor will require significant mitigation or compensation.

Employment Opportunities

The Planning Statement suggests that the development will contribute to the regeneration of Carrington and support *"high quality local employment opportunities during both construction and operation"*.

There is no guarantee set out in the documentation that any of the temporary construction roles will be filled by local people.

This area of the masterplan is identified for employment purposes, but it is our understanding that BESS do not generate any permanent local employment.

This is not the regeneration local communities were led to believe would be the compensation for the huge levels of harm to be caused to their environment, to the ecology and to the bird and wildlife species in the area.

As it is our understanding that the BESS will bring ZERO permanent jobs, the applicant should be asked to clarify how many permanent local jobs will be created and that they will prioritise local applicants for the temporary construction roles (to be underpinned by a planning obligation for a Local Labour Agreement to be put in place).



Flood Risk Assessment

The Flood Risk Assessment records an internal inconsistency between its summary table (4.1), which flags groundwater as a potential significant flood risk at the site, and its narrative conclusion (paragraph 7.1), which assesses the risk as not significant. This should be reviewed by the Council's LLFA to ensure any issues (including in relation to any underground grid connection cable routes) are resolved.

Archaeology

The Historic Environment Desk-Based Assessment identifies (paragraph 3.4) potential low-to-medium significance archaeological remains but does not recommend a programme of archaeological investigation to be secured by a planning condition, which we understand would be the typical remedy.

Missing, Inaccurate or Incomplete Documentation

Given this is a huge (not just large, but massive) Battery Energy Storage System (BESS) and it is a Full Planning Application, one would anticipate that the documentation would be comprehensive and complete. This is not the case. Appendix C of the NPPF sets out the information requirements to be expected. We cannot find, for example, a Ground Conditions Report to demonstrate that the requirements of NPPF policy P2 have been met, nor the required reports to demonstrate that the requirements of NPPF policy P3 have been met. Given the proposed security measures, this would include lighting (dark skies) but because of the size and scale of the development, access to light should also be considered.

We, therefore, do not consider this development complies with the NPPF or PfE policies.

The Planning Design and Access Statement (paragraph 1.5) suggests several documents should be available that are not on the portal, these include:

- the Cover Letter
- the Ecological Impact Assessment (EclA)
- the Noise Assessment
- Landscape and Visual Appraisal (there is a graphic but no report)
- Landscape Strategy (there is a graphic but no report).

It is inappropriate to expect communities to comment on a planning application when so much of the documentation is not available.

In addition, as mentioned above, there is also no Ground Conditions Report nor a Geological Survey Report. There is also no report which sets out the various impacts of light for nearby receptors.

The BNG Metric spreadsheet is incomplete and there is no BNG Report.

The Transport Assessment is based on another, smaller development and a relevant update should be requested from the applicant.

Decommissioning

The Planning Statement highlights (paragraph 3.3.11) 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.



Cumulative Impact

The Planning Statement suggests (paragraph 2.4) that the proposed development would cause no cumulative impacts with any of the other developments listed in the appendix, that the assessments included to support this application have considered the cumulative effects with those developments listed in Table 2-1 and has concluded that *“it is not anticipated that there would be any no [sic] cumulate impacts as a result of this proposed development”*.

This is an astounding conclusion, given the size and scale of this and other developments in the area. The cumulative traffic impact alone is certainly substantial and the cumulative impact of air, noise, light, vibration, dust and water pollution during construction will be significant, for both human and wildlife populations.

Risk (including Cumulative Risk) of Fire and Toxic Fumes

We highlighted the risks of BESS in our previous planning application response (115160), including reference to [expert evidence](#)³, which 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”*.

Trafford has already approved several BESS planning applications in Carrington, including another large BESS at the Carrington Powerstation site, which was doubled in capacity through a so-called ‘non-material’ amendment to the original planning application.

Given their proclivity to uncontrollable fires, which are hard to extinguish, and the release toxic fumes, the number of BESS in the area significantly increases the probability of that risk materialising, with residents (including future residents), 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.

We do not believe the planning application incorporates sufficient information about the risks associated with this development, which is contrary to the [Gunning Principles](#)⁴ (principle 2 requires that there is sufficient information to give ‘intelligent consideration’ to an issue). In fact, the risks are minimised in the Planning Statement (paragraph 3.3.5), which states that there is *“a very low risk of battery cell failure and an even lower risk that any failure would present a risk of fire”*.

We urge the council and the applicant to be honest and transparent with residents about this risk and 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.

³ <https://static1.squarespace.com/static/656f411497ae14084ad8d03a/t/66fd2383b56dbc6906390297/1727865736681/Fannon-Batteries.pdf>

⁴ <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>



There is also 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*”.

Furthermore, 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 CPRE⁵, which highlights the potential risks of fire and thermal runaway. Planning applications, [such as this one](#)⁶, and [this one](#)⁷, have been refused in other areas due to the perceived fire risk. This [Significant Incident Report](#)⁸ highlights the risks to fire service staff and covers a fire in Liverpool (2020) that burned for 59 hours.

Planning Balance

Lack of Compliance with Policy

As set out above, this planning application is premature as it is coming forward in advance of the New Carrington Masterplan. It also does not comply with NPPF policy requirements. This should be given substantial negative weight when considering the planning balance.

Climate Mitigation

When considering the Planning Balance for planning application 115160, the Officer stated that “*Substantial weight is afforded to the proposal’s significant benefit with respect to the contribution the BESS would make to mitigate climate change and help regulate electricity flows within the wider supply network*”.

It should be noted that Ofgem⁹ is currently running a consultation to secure an Oversubscribed Technologies Commitment Fee due to the battery queue having grown far beyond what is needed to deliver Clean Power 2030, “*with around 90GW of battery capacity currently either operational or in the reformed connections queue, compared with a projected requirement of around 29GW by 2035*”. This step follows a warning from DESNZ and Ofgem in April 2026¹⁰ that the battery pipeline remained heavily oversupplied, with projects in the queue far exceeding the capacity expected to be needed to deliver a clean power system.

We raised this issue in our response to planning application 115160 and were ignored, despite the destruction to be caused to an irreplaceable habitat. This issue should be taken into consideration for this planning application given the harms to be caused, the lack of compliance with JPA30 (criterion 1) and the lack of ability for this scheme to deliver what is expected by NPPF planning policy (including sustainable development, carbon reductions and renewable energy supply). Substantial weight should not be afforded to something that cannot support climate mitigation if it is not connected to the Grid for a decade or more (the technology will have advanced during that period).

⁵ <https://www.cpreherts.org.uk/news/are-battery-energy-storage-systems-bess-safe/>

⁶ <https://www.bbc.co.uk/news/articles/c2kxxzkz335o>

⁷ <https://www.lincolshirelive.co.uk/news/lincoln-news/battery-storage-system-refused-over-9769626>

⁸

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

⁹ <https://www.ofgem.gov.uk/press-release/ofgem-moves-free-grid-capacity-tackling-excess-battery-projects>

¹⁰ <https://www.gov.uk/government/publications/connections-reform-delivery-update-and-battery-capacity/open-letter-from-densz-and-ofgem-on-connections-reform-delivery>



Financial Contribution

The Officer's report for planning application 115160 also highlighted that *"The application makes its full IPS financial contribution and moderate weight is afforded to this"*. We can find no reference to developer contributions in the documentation, other than an acknowledgement that they are a requirement of PfE.

Any lack of commitment to the same contribution requirements as the previous BESS (115160) should be awarded substantial negative weight in the planning balance.

Connection to the Grid

Given the oversupply of BESS (mentioned above), NESO has put in place a methodology¹¹ to manage potential future proposals. The document suggests (footnote 6) that standalone BESS sites will be automatically moved the back of the queue, behind the 83GW of developments that already have Gate 2 status. Currently NESO is predicting delays of possibly more than 10 years for connection dates.

The applicant should, therefore, be required to provide evidence of the potential connection date for their site.

Previous Non-Material Considerations

The applicant points out in the Planning Statement that previous BESS and other applications have benefited from post approval 'non-material' amendments to significantly increase what has been proposed and consulted upon (in the case of the Power Station BESS doubling the capacity from 1040MW to 2080MW). Doubling capacity can hardly be considered 'non-material'.

Trafford's repeated approval of such changes as 'non-material' leaves residents with no confidence that what is being proposed is what will be delivered and we would request that residents are fully consulted on all such future material changes (even if they are described as 'non-material').

Decision

For the reasons set out above, the Planning Application should be refused.

Kind regards

Marj Powner (Chair), Friends of Carrington Moss

¹¹ <https://www.neso.energy/document/382776/download>